

Municipal ID Program
LANGUAGE ACCESS PLAN & PROTOCOL
2019

PURPOSE AND AUTHORITY

- In cooperation with the Mayor's Office, the Municipal ID Program is committed to compliance with the Title VI of the Civil Rights Act of 1964 (Prohibits discrimination on the basics of race, color or national origin), 2 C.S. § 561et 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 Municipal ID 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 to "ensure all Philadelphians have access to a valid governmental issues photo ID."

GENERAL POLICY

- A. Municipal ID Program recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of Municipal ID Program to ensure meaningful access to LEP individuals. Municipal ID Program adopts the following policy to ensure that LEP individuals can gain equal access to Municipal ID Program services and communicate effectively. This Plan applies to all Municipal ID Program office location and mobile sites.
- B. 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 Municipal ID Program intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Municipal ID Program seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.
- C. **Responsibility Statements**
 - The department, rather than the LEP customer, bears the responsibility for providing language appropriate services. Staffs 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 will be allowed. **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
- D. **Preferred Method of Service**

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 telephone 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.
5. Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the LEP person.

LANGUAGE ACCESS COORDINATOR OR COMMITTEE

Language Access Coordinator

Pedro J Melecio
Municipal ID Program City Hall, Room 167
215-686-3002
Pedro.melecio@Phila.gov

Program Director

Amy Eusebio
Municipal ID Program Director
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A. Role

- Act as liaison between the program and the Office of Immigrant Affairs
- Advise the Commissioner or head of the office, board, or commission on Language Access policy, protocol, plan implementation, and related Language Access issues.
- Act as lead of the Language Access Committee, if Municipal Program choose to create one.
- Act as key point person for implementation and accountability of the program's Language Access Plan.

B. Policy Planning and Implementation

- Work with their program to develop a comprehensive language plan, which include protocols to carry out the plan. This plan shall be in accordance with all Executive Orders and the Managing Director's Office (MDO) directives.
- Consult with stakeholders in devising the department Language Access Plan, policies and protocols. This may include and is not limited to language service providers, staff in various units, community advocates and community organizations.

C. Annual Report

- Write and file the program's annual report as required by the Philadelphia Home Rule Charter, 8-600.

- Provide periodic updates of monitoring information and analysis to the Office of Immigrant Affairs.

D. Training

- Establish a training schedule and organize regular, ongoing training of program staff to ensure they are aware of the program Language Access Plan, protocols and that newly hired staff are provided Language Access training.
- Review Language Access training materials on an annual basis and work with appropriate resources to update as needed.

E. Outreach

- Work with the program to develop means of notifying the public of the availability of Language Access service with the program and how to access them. This may include: public advertising, community outreach, posted notices in public services areas, tag lines on program's documents, the program's content on the City's website, and other media systems.
- Residents who prefer to use their own translator and decline City's translation services will be allowed.
- Develop a method to periodically report to and gather input from stakeholders.

F. Provision of Services

- Become familiar with the Language Access service contracts available through the Office of Immigrant Affairs and serve as central point of contact to vendors in the request and provision of these services within the program.
- Serve as resource and troubleshooter for staff on using Language Access service.
- Handle complaints and receive other feedback about the use of Language Access service.
- Serve as the point person for correspondence with the Office of Immigrant Affairs regarding billing and invoicing.

G. Monitoring

- Collect, track and report language specific data of person served, the use of Language Access service, and the need for changes in the policy and protocols.
- Develop system to ensure the contractors or grantees of the program comply with the program's Language Access policy.
- Develop procedure for the program to receive and respond to complaint regarding Language Access.
- Attend meetings with other Language Access Coordinators to discuss issues related to Language Access services within the departments and programs.

DIRECT CONTACT WITH LEP INDIVIDUALS

Municipal ID Program will offer several points of contact with the public:

- (1) **Office based:** The Municipal ID program interacts with members of the public when they visit City Hall Room 167 to apply and obtain their PHL City ID. The Municipal ID Program currently employs four bilingual Spanish Speakers and one Spanish, French, Boule, Dioula and Italian (basic) speaker. All public facing offices have access to a bilingual Spanish French, Boule, Dioula and Italian (basic) interpreter. In the event that an in-person interpreter is not available staff may contact one of our five staff interpreters by telephone. If the interpretation is needed in a language other than Spanish, French, Boule, Dioula and Italian (basic), staff utilizes telephonic interpretation services.
- (2) **Public events and Community Engagement Activities:** The Municipal ID Program the Municipal ID Program staff attends community engagement activities and public events. If language needs are anticipated, staff will seek interpretive assistance from event organizers or component bilingual staff member for in-person interpretive assistance in the appropriate language or utilize telephonic interpretation.

LANGUAGE ACCESS SERVICES AND PROTOCOLS

A. Current Plan

The Municipal ID Program provide Language Access assistance at no cost to limited English proficient (LEP) customers who utilize the walk-in center and mobile site.

LEP persons can use the poster to identify their language to an employee. In addition, the posters alert LEP persons about the availability of language in a quick and easy manner.

“Interpretation Service Available” stand-up posters are positioned on all counters with twenty languages to identify the language of an LEP.

Walk-In center

- Telephonic interpreter services are provided using the Language Line service.
- Use available bilingual staff within the program (Spanish)

Community Events and mobile sites

- Telephonic interpreter services are provided using the Language Line service.
- Use available bilingual staff within the program (Spanish)
- Use materials that are translated in top five languages spoken in Philadelphia after English

Presentations

- Use available bilingual staff within the program (Spanish)

- Use materials that are translated in top five languages spoken in Philadelphia after English
- For all presentations that need an interpreter in a language other than English, Spanish, or French we will request an in-person interpreter a least two weeks before the presentation.

B. Future Plans

- Identify and train bilingual staff in standards for providing language translation assistance.
- Enhance language translation assistance training
- Feedback on our use of telephonic interpretation service will be gathered.
- Translate most frequently asked questions in Spanish, and top five languages spoken Philadelphia after English.

Interpretation

1.) Services Provided

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our program will continue to provide an interpreter, at no cost to the resident, for LEP individuals. Services offered include telephonic interpretation and in person interpretation. In person interpretation services are provided when possible based on availability of available competent bilingual staff.

2.) Protocols

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our Municipal ID Program 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 “Interpretation Services Available” poster, the employee shall determine whether bi-lingual staff in the office is available who speaks the language being requested.

3.) Procedures

- 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:

Telephonic Interpretation – The Municipal ID program can get an over-the-phone interpreter by calling the following vendor: GLOBO. This service is available 24/7.

To submit a request, call 267-318-492 and provide the following information when greeted by a coordinator: program code and language needed.

- 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

You can request an in-person interpreter by contacting the following vendor: GLOBO. 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 an interpreter, the Language Access coordinator will contact the Office of Immigrant Affairs and include date, time, location and language needed.

Cancelation of In- Person Interpreter

If a request in-person interpreter will not be needed, contact the Office of Immigrant Affairs at least a full business day in advance of the scheduled time (if possible).

4.) Future Plans

- Use telephonic interpretation and ensure that the public knows about the availability of these services.
- Grow in-person interpretation services.
- Develop performance measures to evaluate quality of assistance provided to LEP customers.

Translation

1.) 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 translations, at no cost, for LEP individuals. This includes translations of vital documents, signage and portions of our website.

2.) Protocols for Document Translation

The following Municipal ID program related documents are translated from English to Spanish.

- a) Promotional materials, application, process.
- b) One pager, and ways to connect with Municipal ID program.

3.) Procedure for Submitting a document for translation:

- a) Email the editable document to Language Access Program coordinator at pedro.melecio@Phila.gov
- b) Municipal ID Program Language Access Coordinator will submit the translation request to OIA, in order to obtain a quote from a translator vendor.

- c) OIA will email the coordinator a quote with a time estimate for delivery of the translation.
- d) Quote must be authorized by person with authority
- e) Quote is then signed and emailed back to the Office of Immigrant Affairs
- f) OIA will email you the translated documents.

4.) Signage

The Municipal ID Program does not have any directional signage within its office. All visitors arrive immediately at the 311-walk-in office, at which point the need for language assistance will be determined by the Engagement and Outreach workers and the steps towards providing the assistance initiated.

5.) Website:

The Municipal ID Program will work in conjunction with the Office of Immigrant Affairs (OIA) and the Office of Information Technology (OIT) to translate the following on the PHL City ID website/page:

- Google translate
- Frequently asked questions
- Add taglines to advise customers to call PHL City ID Language Coordinator for translation services.
- Social Media Toolkit

Future Goals

1.) Goals

- a. The Municipal ID Program will continue to develop and edit public materials for LEP customers at no cost to the customer. The interpretation services will continue to be used for telephonic and walk-in center translations, program will work with the Office of Immigrant Affairs to identify additional resources to ensure translations are clear and consistent.
- b. Validation of language competency and training will be provided to bilingual employees to ensure quality consistency. These employees may assist when available with social media, mobile sites, telephonic, walk-in center interactions.

2.) Bilingual Staff

This list identifies the languages spoken by **Municipal ID Program** staff that is linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.

Staff name	Language
Anny	Spanish
Anjanette	Spanish
Pedro	Spanish
Joseph	Spanish
Adelaide	Spanish, French, Baoule, Dioula, basic Italian

3.) Future plans

- Hiring: hiring decisions are based on City department's business needs as interpreted by department heads, including language service needs. Bi- or multi-language needs will be addressed if they are bona fide occupational qualifications.
- Train bilingual staff on criteria and protocols for assisting and/or interacting with LEP customers.
- Develop performance measurements to evaluate quality of assistance provided to LEP customers.

TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS

This section lays out what the department's training policy and schedule will be to ensure that all staff is familiar and aware with the Department's Language Access policy, plan, and the protocols for language services. When completing this section, please keep the following in mind:

1.) Training Protocol

- Municipal ID Program Language Access Plan & Protocol is part of the staff handbook, to all Municipal ID Program staff members at hiring.
- Municipal ID Program 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 in-bound calls will receive annual LEP training, or training upon employment, and then annually.
- Municipal ID Program will circulate this Language Access policy and related protocols to all staff within 10 days after adoption. Every two years, Municipal ID Program will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, Municipal ID 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 six months of the beginning of their employment with Municipal ID Program 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 Municipal ID 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 Municipal ID Program with the Language Access coordinator, Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

2.) Future Plans

The Municipal ID Program will update its list of staff who speaks languages other than English and who are willing to assist with interpretation.

NOTICE OF THE RIGHT TO LANGUAGE ACCESS

1.) Current

Posters notifying Limited Proficiency (LEP) customers of the availability of free telephonic language translation services and how to access are available in the Room 167 walk in center and mobile sites. The message will be available in the top five languages spoken in Philadelphia after English.

2.) Future

Obtain Language Access information cards translated in the most popular languages spoken in Philadelphia to be used at community events and in the walk-in center (Room 167).

DATA COLLECTION AND ANNUAL REPORT

The following information will be required to be monitored and collected by departments and will be collected via reports by the Municipal ID Program:

- (1) Number of LEP Encounters (By Language)
- (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 staffs
- (2) Number of staff trained in Language Access/Cultural Competency

LANGUAGE ACCESS COMPLAINT PROCEDURE

You may file a formal Language Access grievance with the Municipal ID program 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:

Language Access Coordinator
 Pedro J Melecio
 Municipal ID Program City Hall, Room 167
 215-686-3002
Pedro.melecio@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:

Philadelphia Commission on Human Relations
 The Curtis Center
 601 Walnut Street
 Suite 300 South
 Philadelphia, PA 19106

For more information, please visit www.phila.gov/humanrelations

TIMELINE FOR IMPLEMENTATION

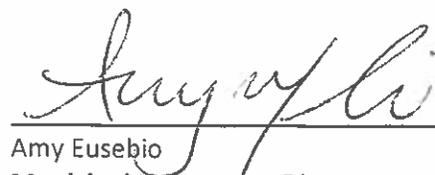
Major milestones in our plan will include:

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| • Train frontline responders | January 2019 |
| • Implement Plan | Spring 2019 |
| • Translating public documents | Winter-Spring 2019 |
| • Continuing to broadly translate and interpret | Ongoing |
| • Updating agency Language Access tools and resources | Ongoing |
| • Exploring additional training opportunities | Spring 2020 |
| • Collect First year data | Spring 2020 |

SIGNATURE PAGE



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 Director

