

2016

LANGUAGE ACCESS PLAN



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Department Of Public Property

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DEPARTMENT OF PUBLIC PROPERTY
LANGUAGE ACCESS PLAN & PROTOCOL

2016

1. PURPOSE AND AUTHORITY

“In Cooperation with the Mayor’s Office, the Department of Public Property 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 Department of Public Property (DPP) 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 vision, which is to “ensure that all DPP controlled facilities are operated in a safe and habitable condition in support of government operations and public access

2. GENERAL POLICY

- A. The Department of Public Property recognizes that the population eligible for services includes individuals who are limited English Proficiency (LEP). It is the policy of the DPP to ensure meaningful access to LEP individuals. The DPP adopts the following policy to ensure that LEP individuals can gain equal access to public buildings under DPP jurisdiction and the Department’s services and communications effectively. This plan applies to all the Department of Public Property offices and satellite offices.
- 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 Department of Public Property intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Department of Public Property seeks to reduce barriers by guiding LEP persons directly where they can get the best service in their primary language.

C. Responsibility Statements:

The department, rather than the LEP customer, bears the responsibility for providing language appropriate services. Staff at the initial point of contact has 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.

D. Preferred Method of Service:

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

Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.

The preferred method of serving LEP customers is by using competent bilingual staff able to provide services directly to the customer in his/her primary language without the need for an interpreter.

Staff should seek assistance from professional in-person or telephone interpreters when staff cannot meet language needs. DPP recognizes that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities is available.

3. LANGUAGE ACCESS COORDINATOR OR STEERING COMMITTEE

Language Access Coordinator

Azia L. Harris
City of Philadelphia Department of Public Property
Language Access Philly
City Hall, Room 788
Direct: (215)686-4441
Azia.Harris@phila.gov

Director

Lori Davey
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Language Access Philly
City Hall, Room 780
Direct: (215)686-4482
Lori.Davey@phila.

4. DIRECT CONTACT WITH LEP INDIVIDUALS

The Department of Public Property has very few points of contact with the public:

Tourist/visitors/inquiries about vacant lots (walk-ins) - During the week there are very few LEP individuals who come in looking for services. However, telephonic interpretation will be available if an LEP individual is seeking access to services in City Hall and the Security staff cannot assist the individual; the LEP person will then be escorted to Philly 311, Room 167, City Hall, so they can use the telephonic interpretation service.

Meetings/information (update) sessions- DPP will hold a brief quarterly meeting (1/2 hour). This meeting/ information session will review information regarding encounters with LEP individuals. Discussion will include what has developed over the past quarter (if anything) regarding services, what needs to be added to or taken away from the current services that are currently available

5. LANGUAGE ACCESS SERVICES AND PROTOCOLS

A. INTERPRETATION

Interpretation is the immediate oral rendering of the source language into the target language.

DPP offers interpretation services for LEP persons visiting City Hall through Philly 3-1-1 in Room 167, City Hall (telephonic interpretation) and bilingual staff.

1) Services Provided

To ensure that LEP persons are not deprived and have the same rights/privileges of using the City's resources as a resident or a visitor. DPP will continue to provide an interpreter at no cost to the LEP individual. The services DPP offers are as follows: the telephonic interpreter and in person interpretation.

2) Protocols

To ensure that LEP person are not deprived and have the same rights/privileges of using the City's resources as a resident or a visitor. DPP will continue to provide an interpreter at no cost for LEP persons pursuant to the following procedures:

- a) An individual approaches an employee and appears to be asking for services but has difficulty communicating what they need
- b) When a request for an interpreter is made orally, in writing, or providing a language card; the staff member should then determine whether a bilingual employee in the office is available who speaks in the language being requested.
- c) If a bilingual staff member is unavailable the employee will then escort the LEP individual to the Philly 311 Room, so they can use the telephonic interpretation.

3) Procedures:

When bilingual staff is not available, the employee shall escort the LEP person to the nearest available telephone interpreter services, the process on how to do so is as follows:

Telephonic Interpretation-

DPP can get over-the-phone service by escorting the LEP person to the designated area where telephonic interpretation services are available. This service is available 24/7.

4) Future Plans:

The plan for improving awareness of Language Access Services would be for multi-language posters (the top five languages) to be visible on the Northeast quadrant of City Hall along with posting information about the services provided by way of social media. DPP will work closely with Philly311 to get information on the top three (3) languages that are most encountered.

The other buildings under DPP jurisdiction are One Parkway Building and Municipal Services Building which will have telephonic interpretations and posters to guide LEP individuals to the appropriate area for interpretation services. However, the Criminal Justice Center will not have a telephonic service.

B. TRANSLATION

Translation is the rendering of a written text from the source language into the target language.

What documents are currently translated and in what languages?

No documents are currently translated in any languages.

What vital documents are translated and in what languages?

No vital documents to translate.

What material on the website is currently translated?

Everything except for visitors page (some pages have a link that takes the viewer directly to the OIA page)

What signs in your offices are displayed in other languages?

No signs. Signs in the office are not really needed because the public does not come into DPP offices. There should be signs on the Northeast corner of City Hall (that is the only area accessible to the public).

1) **Services Provided**

To ensure that the inability to communicate in English does not deny the LEP public of services offered within the City, our department will continue to provide translations, at no cost, for LEP individuals. This includes translations of portions of websites, DPP does not have vital records because we do not deal with the public; we deal with workers within the city.

C. **BILINGUAL STAFF**

This list identifies the languages spoken by the **Department of Public Property** staff whom are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.

NAME	LANGUAGE SPOKEN	CONTACT NUMBER	EMAIL ADDRESS
[REDACTED]	Italian		
[REDACTED]	1.Spanish 2.Italian	[REDACTED]	
[REDACTED]	1.Spanish-Castilian, 2.Portuguese-Brazilian, 3.French 4.Italian	[REDACTED]	[REDACTED]
[REDACTED]	Japanese	[REDACTED]	[REDACTED]
[REDACTED]	Swedish	[REDACTED]	[REDACTED]
[REDACTED]	1.Cantonese 2. Mandarine	[REDACTED]	[REDACTED]
[REDACTED]	German	[REDACTED]	[REDACTED]
[REDACTED]	Spanish	[REDACTED]	[REDACTED]
[REDACTED]	1.Arabic 2.French		
[REDACTED]	1.Ukrainian 2. Russian		
[REDACTED]	1.Portuguese 2.Spanish	[REDACTED]	[REDACTED]
[REDACTED]	Spanish		

[REDACTED]	Spanish	[REDACTED]	[REDACTED]
[REDACTED]	1.Hindi 2.Malayalam	[REDACTED]	[REDACTED]
[REDACTED]	Spanish	[REDACTED]	[REDACTED]
[REDACTED]	Spanish	[REDACTED]	[REDACTED]
[REDACTED]	Spanish	[REDACTED]	[REDACTED]

D. TRAINING STAFF ON POLICY, PLAN AND PROTOCOLS

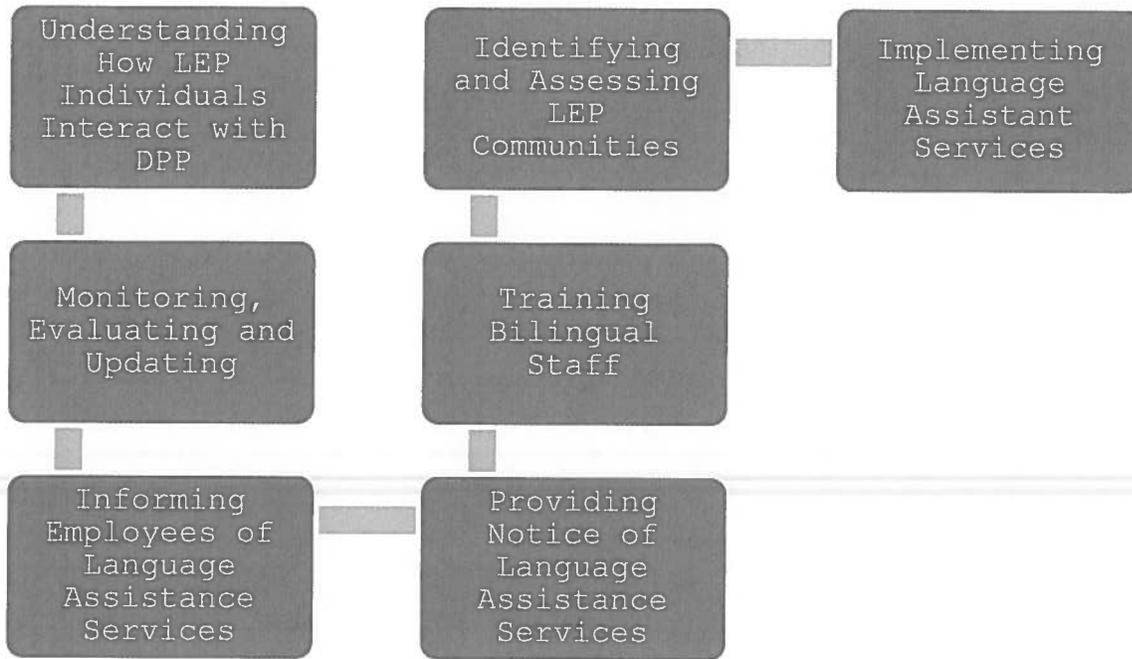
1) Protocol

- A. Department of Public Property’s will distribute the LEP plan to all staff and will have a current electronic copy available so all staff will be aware and knowledgeable of the LEP policies and procedures.
- B. All staff providing technical assistance, training or receiving in-bound calls will receive an annual LEP training, or training upon employment, and then annually.
- C. LEP training will include information on the following topics:
 - Legal obligation to provide language assistance;
 - LEP plans and protocols;
 - Identifying and responding appropriately to LEP individuals;
 - Documenting LEP individuals’ 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.
- D. Department of Public Property will circulate this language access policy and related protocols to all staff within 5 days after adoption. Every year DPP will reissue the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, DPP 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 trainings within six months of the beginning of their employment with DPP. After their initial training, all staff members will receive refresher training in cultural competency and language access annually.
- E. In order to establish meaningful access to information and services LEP individuals, staff that regularly interact with the public and those who will serve as in-house interpreters will be

trained on DPP'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.

- F. Orientations- New Staff training will be provided on the DPP Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents. New Staff members who are bilingual will have to attend training so they can fully know and understand protocols and procedures and how to properly interact with LEP persons.

TIMELINE FOR LANGUAGE ACCESS POLICY



Understanding how LEP Individuals interact with DPP:

DPP does not deal with LEP persons directly; however it can be instances where such interaction can take place. When this does occur we would want to have the staff able and ready to direct the person in the right direction so they can be better assisted in their primary language.

Monitoring, Evaluating and Updating:

DPP has never really implemented the Language Access Policy because there is little to no interaction with LEP persons. However, DPP is currently doing research on some services we could provide for LEP persons to correlate with what we already have (i.e. signs, bilingual staff on call etc.). DPP will monitor

the development of the Language Assistance Services to see what services are beneficial and what services are not as beneficial and ways we could provide a better service(if needed). Ways DPP could keep records of what is beneficial/not beneficial is by giving staff and LEP persons a survey or questionnaire to complete.

Informing employees of Language Assistance Service:

All employees will receive an electronic language access policy booklet. This is to make the employee aware of the policy and the regulations that correlate with the policy. Also, employees who are bilingual will know that they will have training in the near future as well.

Identifying and Assessing LEP Community:

DPP does not have much interaction with the public because most LEP person interaction are handled by other Departments. So DPP job is to figure out where exactly some interactions take place. We have discovered that on the first floor of City Hall; tourists and visitors that are LEP may have questions or inquiries about a specific service. Posters should be on the first floor of City Hall guiding LEP persons on where to go to get services. Also, we have staff members who could be fully trained to assist LEP persons. Lastly, staffs who work on the first floor could (security guards in particular) direct LEP persons to get better service.

Training Bilingual Staff:

Bilingual Staff will be trained once a year depending on how much interaction between LEP persons and staff occurs. Training objectives will be for staff members to know the procedures when interacting with LEP persons as well as ways to direct LEP persons for better assistance when staff can no longer assist. Staff will not be able to provide services if they do not receive training for policies and procedures, including how to access language assistance services. This training should be mandatory for staff members who are bilingual and staff members who interact and have potential to interact with LEP persons.

Providing Notice of Language Assistance Service:

Ways in which DPP will provide notice about the Language Assistance Service is by putting posters up in the top (3) three languages(DPP will work Philly311 to determine the top five languages); on the first floor of the building. Another way to let LEP persons know about the services provided for them is by way of the DPP website. Lastly would be DPP posting it on social media (i.e. facebook, twitter, instagram etc.).

Implementing the Language Access Service:

Implementing the service may take a few months (2-3) for staff members to get fully comfortable. There is not as much interaction with LEP persons in DPP, so the process has to be implemented consistently for staff members to become familiarized with the protocol.

2) Future Plan:

DPP has already established which staff members are bilingual and multilingual. There will be an email as going out to those particular staff members asking for volunteers to become part of the volunteer language database. The staff members will just review translated materials and/or assist with interpretation emergencies.

6. NOTICE OF THE RIGHT TO LANGUAGE ACCESS

DPP will have posters and signs notifying LEP persons of the language services provided for them in the corner of City Hall. The posters will inform LEP individuals of where you can get assistance, which it is free of charge and the types of services provided.

Staff members on the first floor of the City Hall building will have access to the Language Access Cards. These cards are wallet-sized cards, that will have English and the second (LEP person's primary language) language; also stating that they need assistance in their "primary language".

In all areas which are accessible to the public (i.e. on DPP's website and areas of public contact); there will be a postage of clear and multi-language signs in the top 3 most encountered languages within MSB, OPB, CJC and City Hall building notifying the LEP individuals that translation is free of charge and interpretation services are available to them.

7. DATA COLLECTION AND ANNUAL REPORT

DPP will maintain records for individual's specific needs; this is to be utilized by staff members who have constant interaction with LEP persons. Staff members will keep a record of the primary languages encountered and put it on an excel sheet and formulate files for the specific language so they have the resources to assist with appropriate services in the near future.

This excel spreadsheet should consist of the number of encounters per language, which services were used for the LEP persons and if it was effective. Also, the needs for the policy and protocols (if they need to be updated or edited) to be in excel so that it is understood as to why some services are needed or not.

Questionnaires or just informal questions will be asked of the staff members who have the most interactions with LEP persons. This will determine if new services need to be implemented or if the current services would be eliminated. This method is the most effective for DPP because DPP does not need to do a lot of research for the data collection.

8. LANGUAGE ACCESS COMPLAINT PROCESS

You may file a formal Language Access grievance with the City of Philadelphia Office of Immigrant Affairs if you believe you have been wrongly denied language assistance services. 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, Suite 1430
Philadelphia, PA
orlando.almonte@phila.gov

The grievance form is also available online at:

<https://www.phila.gov/programs/language-access-philly/language-access-grievance-form/>

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

2016

The language Access Group will update the Language Access Policy and send it to the OIA Department for approval. The Language Access policy will be sent out to the staff members electronically and new staff members will receive it in their employee handbook.

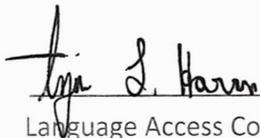
The Language Access Group will update the bilingual and multilingual staff members list and will ask about staff members volunteering to help assist LAG with updating the volunteer language database, review translations and provide interpretation services.

2017

The Language Access Group will train the bilingual and multilingual staff and upon completion of the program the staff members will receive a certification of completion.

The Language Access Group will then monitor and communicate with the Frontline Staff on changes that need to be made (i.e. add/take away from policy and protocols).

10. Signature Page



Language Access Coordinator
Human Resources Professional
(Department Of Public Property)

4/3/2019

Date



Commissioner
(Department Of Public Property)

4-3-19

Date