

LANGUAGE ACCESS PLAN 2019

Purpose and Authority

In cooperation with the Mayor's Office, the City Treasurer Office ("CTO") is committed to compliance with Title VI of the Civil Rights Act of 1964, 2 C.S. 651 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")

General Policy

It is the City's policy to grant access to services or programs to every person even when the person has limited ability to speak, understand, read or write English. CTO intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. CTO seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

Language Access Coordinator

Christian S. Dunbar

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Direct Contract with LEP

Office Walk-ins: Walk-ins are rare and when they do happen it is typically current or former city employees. In the event a LEP person walks into CTO, front staff is aware of the use of telephonic interpretation services in the absence of a staff member that speaks the same language.

Phone: CTO phone calls are also generally in relations to current or former city employees. Check replacement are the main reason for the call's CTO receives. All calls are routing though the front desk and all staff that covers the CTO general line is aware of telephonic interpretation services in the absence of a staff member that speaks the same language.

Language Access Services and Protocols

Interpretation

Services Provided: CTO has several staff member fluent in a language other than English and will make that person available when appropriate. In the event we do not have a staff member that speak the same language our front desk personnel is aware of telephonic interpretation service.

Protocols

 An individual approach an employee and appears to be asking for help but has difficulty communicating what he or she needs, and

Procedures

- Telephonic Interpretation: When bilingual staff is not available, the front desk staff shall contact a telephone interpreter service to provided interpreter services.
 - a. CTO staff will call for a phone interpreter
 - b. In the event CTO staff cannot get an interpreter on the phone CTO will reach out to OIA for further guidance
- In-Person Interpretation: CTO staff will reach out to an in-person interpreter service for a potential meeting with a LEP person

Translation

CTO does not currently provide vital documents to the public and therefore does not have a policy to translate vital documents.

Bilingual Staff

- Current Staff Language capacity
 - Hindi
 - Gujarati
 - Urdu
 - French (conversational)
- Future Plans: Multi-language needs are not bona fide occupational qualifications due to the highly technical requirements and limited interaction with the public for CTO staff. Language will only be considered a plus and not a major factor in the decision-making process.

Notice of the Right to Language Access

Posters notifying LEP individuals of their right to language services will be displayed in areas of public contact. These posters will contain a simple message and will be available in English and Spanish

Data Collection and Annual Report

CTO will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness and identify goals or strategies for servicing LEP individuals. The evaluation will include the following:

- Assessment of the use of telephonic interpretation, in personal interpretation by CTO staff, and translation services.
- Assessment of the number and type of languages requested.
- Assessment of whether the staff understands the Language Access Plan and procedures.
- Assessment of any complaint information

Evaluation of results and recommendation of changes will be shared by OAI's Language Access Coordinator and incorporated into the annual report which is required to be filed under Philadelphia Home Rule Charter 8-600.

Language Access Complaint Process

Anyone who believes they have been wrongly denied the benefits of this Language Access Plan, may file a formal language Access grievance with the Office of Immigrant Affairs. The complaint must be filed within 6 months of alleged breach and must be submitted via a Language Access Grievance Form

(https://www.phila.gov/departments/office-of-immigrant-affairs/) and submitted in person, by mail, or email to:

Office of Immigrant Affairs

Orlando Almonte

Language Access Program Manager Municipal Service Building 1401 JFK BLVD., 14th floor, Suite 1430

Philadelphia, PA 19102

Email: 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 Accommodation Discrimination Intake Form (see www.phila.gov/humanrelations) and submit it in person or by mail to:

Philadelphia Commission on Human Relations

The Curtis Center

601 Walnut street., Suite 300 South

Philadelphia, PA 19106



Signature Page

Language Access Coordinator

Christian S. Dunbar

Philadelphia City Treasurer

Rasheia Johnson