



## CITY OF PHILADELPHIA

BOARD OF ETHICS  
One Parkway Building  
1515 Arch Street  
18th Floor  
Philadelphia, Pa 19102  
215-686-9450  
FAX 215-686-9453

### **Philadelphia Board of Ethics Language Access Plan**

#### **1. Purpose and Authority**

The Philadelphia Board of Ethics (Board or BOE) 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). This Language Access Plan (LAP) describes the actions the Board will take to deliver language access services to individuals with limited English proficiency.

#### **2. General Policy**

The Board supports the City's commitment to provide access to its services and programs to every person even when the person has a limited ability to speak, understand, read or write English. The Board will therefore take reasonable steps to provide LEP persons with meaningful access to its services and programs. Whenever necessary, Board will deliver services to people in their primary language. The Board acknowledges that it, rather than the LEP customer, bears the responsibility for providing language appropriate services. The Board recognizes that its staff members have the specific duty to identify and record language needs at the initial point of contact with an individual. Consistent with the City's language access policy, the Board understands that the use of informal interpreters such as family, friends of the person seeking service, or other customers is discouraged; that minor children are prohibited from acting as interpreters; and that no staff member may suggest or require that an LEP customer provide an interpreter in order to receive services.

The Board of Ethics administers and enforces the City's Public Integrity Laws, which include the Campaign Finance, Ethics, Lobbying, and Financial Disclosure Laws, and the restrictions on political activity by City employees. These laws specifically serve the following constituents: City officers and employees; candidates for City elective office, political committees, their treasurers and staffs; and individuals engaged in lobbying City government. In its administration and enforcement of these laws the Board will ensure that all individuals, regardless of their English language proficiency, will have access to the Board's services and programs. This goal will be accomplished by training Board staff to recognize when language services are needed and to know how to obtain those language access services.



Based upon its experience, Board staff will typically know in advance if language assistance is needed for a constituent. It is important to note that since its inception, the Board has only had two occasions where language assistance was required. One involved a phone call that was misdirected to the Board. In the other situation, a bilingual Board staff member provided assistance.

### **3. Language Access Coordinator**

Hortencia Vasquez  
Legal Services Coordinator  
1515 Arch St, 18<sup>th</sup> Floor  
215-686-9450  
Hortencia.vasquez@phila.gov

### **4. BOE Points of Contact with LEP Individuals**

The Board has points of contact with the public as follows:

- The Board's website, online FAQs, educational documents, and social media: The BOE will review online materials periodically and determine whether any materials are appropriate for translation.
- Public meetings, training classes, and information sessions: The BOE will determine whether language services are anticipated at any of its meetings, hearings, classes and information sessions, and, if needed, will arrange for language services.
- Telephone contacts with individuals who request information about the laws administered by the BOE: BOE staff members will receive training so that they can determine when a caller requires telephonic interpretation services.

### **5. Language Access Services and Protocols**

#### **A. Interpretation Services**

- 1) *Services Provided:* To ensure that the inability to communicate in English does not deprive the public of rights and privileges, the Board will provide an interpreter, at no cost to the member of the public, for LEP individuals. Services offered include telephonic interpretation and in-person interpretation.
- 2.) *Protocols:* Interpretation services will be provided for an LEP person, at no cost to that person, when:
  - (1) An individual approaches a Board employee and appears to be asking for help but has difficulty communicating what he or she needs; and/or
  - (2) When a request for an interpreter is made to a Board employee either orally, in writing or by pointing to a language card.
- 3.) *Procedures:* When there is a request or need for interpretation services for an LEP person:



- (1) The Board's Language Access Coordinator (LAC) will determine whether a bilingual staff member in the office is available who speaks the language being requested.
- (2) If no bilingual staff member is available, the Board's LAC shall contact a telephone interpreter service to provide services as indicated below:

Immediate Need for Telephonic Interpretation – The LAC, will call GLOBO to arrange for over-the-phone interpreter services. If the LAC is unavailable, the Board staff member will call GLOBO. This service is available 24/7.

A request for services is submitted by calling 267-318-4450 and Entering PIN 1000 when prompted.

Future Need for Interpretation Services - When an LEP person requests in-person interpretation for a future meeting, either telephonic or in-person interpretation may be used. To request an in-person interpretation, the BOE LAC, or a Board staff member, will request an in-person interpreter by contacting Orlando Almonte (Orlando.almonte@phila.gov) at the Office of Immigrant Affairs

The LAC will post contact information for the language services providers in the Board's reception area and will distribute this information to all Board staff members.

- 4.) *Administrative Enforcement Proceedings:* When the Board conducts an Administrative Enforcement Proceeding, pursuant to Board of Ethics Regulation No. 2, Investigations and Enforcement Proceedings, BOE staff shall determine whether interpretation services are required and the LAC will request the services as described above.
- 5.) *Future Plans:* To ensure that the public knows about the availability of interpretation services, the BOE will continue to inform the public about these resources through social media and multilingual signs and will train all staff members on using telephonic interpretation services.

## **B. Translation Services**

- 1) *Services Provided:* To ensure that the inability to communicate in English does not deprive the public of rights and privileges, the Board will provide translations, at no cost, for LEP individuals. When needed, this includes translations of vital documents, signage and portions of our website.

The Board maintains documents on its website that assist members of the public to understand the City's Public Integrity Laws, which include the Campaign Finance, Ethics, Lobbying, and Financial Disclosure Laws, and the restrictions on political activity by City employees. These documents include portions of the City Code, Home Rule Charter, Board regulations, FAQs, and plain language educational documents. The Board notes that it has never received a request to translate any of these documents. Further, many of these documents are subject to frequent revision. It may be therefore be preferable to wait until there is a specific request or need to translate a document. If such a request is received, the Board will immediately obtain a translation.



- 2) *Protocols:* If translation services are required, the Board will submit a document for translation as follows:
  - a. BOE staff will email the editable document to the Office of Immigrant Affairs (OIA) – Language Access Program Manager at [Orlando.almonte@phila.gov](mailto:Orlando.almonte@phila.gov);
  - b. OIA will submit the translation request to a translation vendor to obtain a quote;
  - c. OIA will email a quote to the Board with a time estimate for delivery of the translation;
  - d. Quote must be authorized by a Board staff member with authority;
  - e. Quote is then signed and emailed back to OIA; and
  - f. When complete, OIA will email the translated document(s) to the Board.

NOTE: Before submitting a document for translation, Board staff will review the document to ensure the following:

- a. The content has not already been translated in another document;
- b. The document and translation procedure have been approved by the appropriate supervisor;
- c. The document is in a format that can be edited (e.g. MS Word, Publisher, InDesign, etc.);
- d. Terms that should not be translated are highlighted;
- e. The document is written so that it can be understood by readers with lower literacy skills; and
- f. If the translation is a continuation of a series or collection of documents, the Board may request the same vendor to keep the translation consistent.

## **6. Outreach**

The Board will:

- 1.) Obtain and post signage in its reception area to indicate in multiple languages that a person may request interpretation and translation services.
- 2.) The Board will post a notice on its website describing the availability of translation and interpretation services. The Board will also review its website to determine whether specific portions of the website, such as the Contact Us page, might also be translated.
- 3.) The BOE will continue to use translation and interpretation services and ensure that the public knows about the availability of these services. The Board will continue to inform the public about these resources through social media and visible multilingual signs and will train its staff on the use translation and interpretation services.
- 4.) Whenever possible, the Board will solicit feedback from LEP individuals who have used its language access services.

## **7. Bilingual Staff**

The Board currently has one staff member who is bilingual in Spanish. The Board must rely on outside professional language services because its funding and complement of staff will not accommodate the hiring of other bilingual staff.

## **8. Training Staff on Protocols and Procedures**

The Board will distribute the LAP to all staff and will conduct training for staff on its language access policies and procedures and on how to effectively communicate with LEP individuals. Each new staff member will be given the LAP and language access training. Whenever a change is made to the LAP, the revised plan will be circulated to staff and training will be provided as needed.

## **9. Notice of the Right to Language Access**

A sign notifying LEP individuals of their right to language services will be developed and displayed in the Board's reception area. The sign will read ***Free Interpreter services are available. Please ask for assistance.*** The sign will be in English as well as other languages that are likely to be requested.

## **10. Data Collection and Annual Report**

Pursuant to Philadelphia Home Rule Charter § 8-600, the Board will submit an Annual Report of its language access services to the OIA. In preparation for that report, the Board's Language Access Coordinator will keep the following records related to the language access services provided by the Board:

- (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;
- (5) Number of bilingual staff; and
- (6) Number of staff trained in Language Access/Cultural Competency.

In preparation for the Annual Report, Board staff will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness, review the progress of its goals, and identify new goals or strategies for serving LEP individuals. The evaluation will include the following:

- (1) Assessment of the use of telephonic interpretation, in-person interpretation and translation services;
- (2) Assessment of data collected about the LEP's primary language;



- (3) Assessment of the number and types of language requests during the past year;
- (4) 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;
- (5) Assessment of complaint information; and
- (6) Assessment of soliciting feedback from LEP individuals and community groups.

Evaluation results and recommended changes will be reviewed and incorporated into its annual report.

## **11. Language Access Complaint Process**

Any individual may file a formal Language Access grievance with the Board of Ethics if they believe they have been wrongly denied the benefits of this Language Access Plan. Individuals must file complaints within six months of the alleged denial. To file a formal complaint, the individual must fill out a Language Access Grievance Form, available at [OIA@phila.gov](mailto:OIA@phila.gov) and submit the form in person, by mail or e-mail to:

Philadelphia Board of Ethics  
J. Shane Creamer, Jr., Executive Director  
One Parkway Building  
1515 Arch St, 18<sup>th</sup> floor  
Philadelphia, PA 19102  
E-Mail: [shane.creamer@phila.gov](mailto:shane.creamer@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](http://www.phila.gov/humanrelations)

## **12. Timeline for Implementation**

### **2020**

- BOE staff will receive training on the new Language Access Plan and its policies and procedures.
- Multilingual notice of the availability of translation and interpretation services will be posted in the Board's office and on its website.
- Upon determination that language access services are needed, the Language Access Coordinator will timely arrange for on-site services with either the translation or interpretation provider.

2021

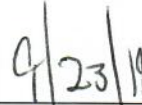
- Any new BOE staff will receive training on the Language Access Plan and its policies and procedures.
- BOE staff will start to review documents on its website to determine whether any should be translated.
- The Language Access Coordinator will continue to arrange with the translation or interpretation provider for on-site translation and interpretation services as needed.

**13. Signature**



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J. Shane Creamer, Jr.  
Executive Director  
Philadelphia Board of Ethics



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Date