

# **REGISTER OF WILLS OFFICE LANGUAGE ACCESS PLAN 2019**

## **PURPOSE AND AUTHORITY**

The Register of Wills Office is dedicated 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 for Register of Wills and Orphans' Court personnel to follow when providing services to Limited English Proficiency individuals.

## **GENERAL POLICY**

The Register of Wills Office recognizes that the population eligible for services includes people with Limited English Proficiency. This policy has been adopted to ensure that LEP individuals have equal access to the Register of Wills Office's services, and applies to all Register of Wills' departments and programs.

It is the policy of the City of Philadelphia to provide access to City services and programs to every individual, regardless of the person's ability to speak, understand, read or write English. The Register of Wills Office is committed to taking reasonable steps to provide persons with LEP, with access to services and programs.

The Register of Wills Office, rather than the individual with LEP, is responsible for the following:

- Provide language appropriate services.
- Identify and record language needs.
- Discourage the use of informal interpreters such as, other customers, friends and/or family of the individual seeking services.
- Prohibit using minor children as interpreters.
- Refrain from suggesting that an individual provide their own interpreter.

The preferred method of serving individuals with LEP is:

- Using bilingual staff, when appropriate, to directly provide services to the customer, without the need of an interpreter.
- Using the services of professional in-person or telephonic interpreters when the staff cannot meet the language needs.
- Recognizing that certain circumstances require specialized interpretation and translation services such as HIPPA, confidentiality, or anything that may have

legal implications. In circumstances such as these, the staff must be authorized to provide language services, for effective communication, regardless of whether the individual with LEP requests an interpreter.

## **LANGUAGE ACCESS COMMITTEE**

### **Language Access Coordinator**

Virginia A. Folino  
Deputy of Human Resources

### **Language Access Committee**

Alba Collazo, Chief Deputy, Register of Wills; Committee Member  
Michael Fera, Administrative Services Director; Committee Member  
Emilio Di Gregorio, Committee Member  
Lucretia Neal-Beyah, Committee Member

## **DIRECT CONTACT WITH LEP INDIVIDUALS**

The Register of Wills Office has multiple points of contact with the public:

- *Office Walk-ins:* The Register of Wills Office primarily encounters walk-in clients, looking for services connected to estates, marriage licenses, and Orphans' Court filings. In these circumstances, if there is no bilingual staff to assist the client, then the staff will utilize telephonic interpretation services.
- *Telephone Calls:* The Register of Wills Office, at times, receives telephone inquiries from individuals with LEP, and will use its bilingual staff to provide information. If a staff member is not available, or the individual requires assistance in a language that cannot be provided, telephonic interpreters will be utilized.
- *Mail or Email Correspondence:* Infrequently, the Register of Wills Office receives correspondence in a language other than English. In these instances, bilingual staff will be utilized to translate general correspondence. If the correspondence is more detailed, the Register of Wills Office will utilize a trained translator for the correspondence and the Office's response.

# LANGUAGE ACCESS SERVICES AND PROTOCOLS

## *A - INTERPRETATION*

To ensure that an inability to communicate in English does not deprive the public of rights and privileges, the Register of Wills Office will provide interpretation services, at no cost to the resident, for individuals with LEP.

- Bilingual staff will be utilized for basic interpretation.
- Telephonic interpretation will be utilized if a bilingual staff member is not available to assist an individual with LEP.
- If an individual with LEP requests interpretation for a meeting, legal hearing, senior expo, traveling service or any other service, telephonic interpretation or in-person interpretation may be utilized.
- In-person interpretation requests should be made 48 hours in advance of the needed service, to ensure availability. Requests may be made in person:

Register of Wills  
Room 180 City Hall  
Philadelphia, PA 19107  
9:00 AM to 3:00 PM

Monday to Friday, excluding City holidays and office closings

OR

Through the Register of Wills email:

[rowonline@phila.gov](mailto:rowonline@phila.gov)

\*Please reference In-Person Interpreter Request

- In an emergency situation, telephonic interpretation will be utilized in place of an in-person interpreter.
- If the services of a pre-scheduled, in-person interpreter are no longer needed, 24 hour notice of cancellation must be given by the requestor, in writing, via the office's email: [rowonline@phila.gov](mailto:rowonline@phila.gov)

Future Plans:

- Continue to utilize telephonic interpretation service, in-person interpretation service and bilingual staff.
- Post visible, multilingual signs informing individuals of the Office's services.
- Train staff on the proper use of the telephonic interpretation system.

## *B - TRANSLATION*

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, the Register of Wills Office will provide translation of certain documents, a frequently asked question form (FAQ), and signage in multiple languages.

Future Plans:



- The Register of Wills will continue to translate our vital documents and information guides into multiple languages.
- Prominently post Language Identifications Guides in all Register of Wills departments.
- Advertise Language Access information in Al Dia or El Sol newspapers.
- Provide translated information at Senior Expos and community events.

### *C – BILINGUAL STAFF*

The Register of Wills Office has several staff members who are linguistically, culturally, or technically able to deliver basic services, in other languages such as:

- Spanish
- Portuguese
- Italian

Future Plans:

- Continue to staff our high-traffic departments with, at least, one Spanish speaking employee at all times.
- Request “language preferred” when selecting employee new hires. Based on need, “language preferred” may be considered as a qualification for certain departments. Preferred languages are: Spanish, Vietnamese, Mandarin, Cantonese, French, Creole or Russian.
- Continue to update our Language Access Program to meet the needs of the public.

### *D – TRAINING STAFF ON POLICY, PLAN AND PROTOCOLS*

The Register of Wills Language Access Plan will be posted on the Register of Wills website, and provided to all current staff, immediately upon policy completion. All newly hired staff members will receive a copy of the policy during the on-boarding process.

All staff members will be provided with a packet of information, which will include translated documents (upon completion), telephonic interpretation instructions and access number(s), instructions for obtaining in-person interpreters, and information about the legal requirement to provide language assistance.

Language Access Training will be provided for all new hired or newly promoted managers, supervisors, deputies, and their assistants, and staff providing assistance to the public.. The training will include:

- Legal obligation to provide language assistance
- LEP plan and protocols
- Identifying and responding appropriately to individuals with LEP
- Documenting language preferences
- Obtaining interpreters (in-person and over the phone)
- Translating procedures
- Documenting language requests
- Using or not using bilingual staff as in-house interpreters

#### Future Plans:

- The Register of Wills Office will schedule Language Access training, every three years, for senior level staff.
- Document all staff that are bilingual, and willing to assist with interpretation.

## DATA COLLECTION AND ANNUAL REPORT

The Register of Wills will monitor and collect information from individual departments. This information will be provided to the Deputy of Human Resources, by the first day of each month, and include the number of LEP encounters, type of language services provided, and number of documents (if any) translated, for the previous month.

The Finance Officer will be provided with a list of language services expenditures on the first day of each month, for the previous month.

Deputy of Human Resources will provide an annual report (Fiscal Year) detailing the number of bilingual staff and the number of staff trained or retrained in language access, and the number of clients who were provided language access services.

The Language Access Committee will be responsible for maintaining individual reports, for each fiscal year, for three years.

## LANGUAGE ACCESS COMPLAINT PROCEDURES

Individuals 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 email to:

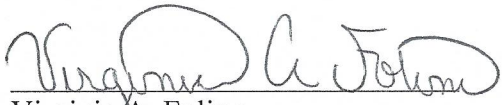
Office of Immigrant Affairs  
Orlando Almonte  
Language Access Program Manager  
Municipal Services Building  
1401 JFK BLVD., 14<sup>th</sup> Floor, Suite 1430  
Philadelphia, PA 19102  
Email: [Orlando.almonte@phila.gov](mailto:Orlando.almonte@phila.gov)

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 Accommodations Discrimination Intake Form and submit it in person or by mail to:

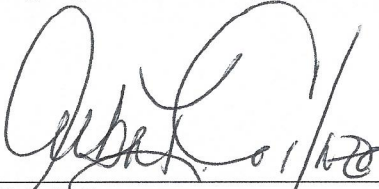
Philadelphia Commission on Human Relations  
The Curtis Center  
601 Walnut Street, Suite 300 South  
Philadelphia, PA 19106

To access the form and for more information, please visit [www.phila.gov/humanrelations](http://www.phila.gov/humanrelations)

**Signature Page**



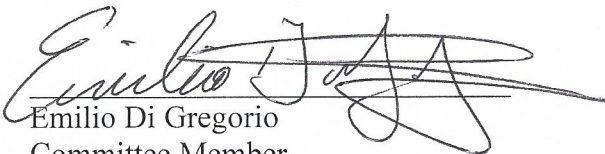
Virginia A. Folino  
Deputy of Human Resources  
Language Access Program Coordinator



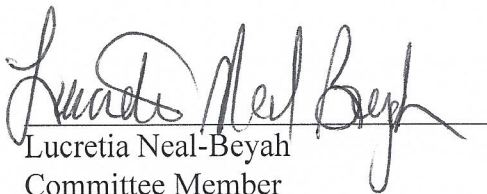
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