

OFFICE OF THE DIRECTOR OF FINANCE:
ACCOUNTING, ADMINISTRATIVE SERVICES, BUDGET, FINANCE
PROGRAM MANAGEMENT OFFICE, INTERNAL CONTROLS AND
COMPLIANCE, ONEPHILLY, PAYROLL, RECOVERY AND GRANTS, AND
RISK MANAGEMENT

LANGUAGE ACCESS PLAN
2021

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I. INTRODUCTION

A. PURPOSE AND AUTHORITY

This plan is a subset of the Finance Master Language Access Plan (LAP) and encompasses the following units: Accounting, Administrative Services, Budget, Finance Program Management Office, Internal Controls and Compliance, OnePhilly, Payroll, Recovery and Grants, and Risk Management.

The Finance Master Access Plan includes the Board of Pensions and Retirement, the City Treasurer's Office, the Office of Property Assessment, and the Department of Revenue.

B. GENERAL POLICY

- i. The Office of the Director of Finance recognizes that we provide services for a population that includes individuals who are Limited English Proficient (LEP). It is the policy of the Office of the Director of Finance to ensure meaningful access to LEP individuals. Finance adopts the following policy to ensure that LEP individuals can gain equal access to our services and communicate effectively.
- ii. 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 Office of the Director of Finance intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Office of the Director of Finance seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.
- iii. *Responsibility Statements:*

 - The Office of the Director of Finance, rather than the LEP customer, bears the responsibility for providing language-appropriate services. Staff 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 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.
- iv. *Preferred Method of Service:*

 - The preferred method of serving LEP customers is by using competent bilingual staff who are able to provide services directly to the customer in his/her primary language without the need for an interpreter.
 - Available, trained, competent bilingual staff may be used for in-person or telephone

interpreting to support other staff.

- Staff should seek assistance from professional in-person or telephone interpreters when staff cannot meet language needs. Departments should recognize that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available.
- Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the customer.

C. LANGUAGE ACCESS COORDINATOR

Dung Nguyen, Finance Program Management Office, Office of the Director of Finance
Municipal Services Building, Suite 1580
(215) 686-5612
Dung.Nguyen@phila.gov

II. DIRECT CONTACT WITH LEP INDIVIDUALS

Accounting, Administrative Services, Budget, Finance Program Management Office, Internal Controls and Compliance, OnePhilly, Payroll, and Recovery and Grants are internal service departments/offices and therefore primarily interact with City employees and vendors. There are few, if any, LEP City employees.

Risk Management has a few points of contact with the public:

- The submission of forms: Any individual who wishes to file a claim against the City for bodily injury or property damage must complete a claim form. The form is available via the website and through the mail upon request. A form is also required for any non-profit or community group who wishes to obtain Special Event Liability Insurance.
- Phone inquiries: LEP individuals will occasionally call Risk Management with questions regarding the services provided.
- Office walk-ins: Risk Management receives up to three LEP walk-in visitors each week.

III. LANGUAGE ACCESS SERVICES AND PROTOCOLS

A. INTERPRETATION

1. Services Provided

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, Finance will continue to provide an interpreter at no cost to the resident. Services offered include telephonic interpretation and limited in-person interpretation.

2. Protocols

Interpretation services will be provided pursuant to the following scenarios:

- An individual approaches or calls an employee and appears to be asking for help but has difficulty communicating what the individual needs, and/or
- A request for an interpreter is made orally, in writing, or by pointing to a language card.

3. Procedures

- When a bilingual staff person is available, the available individual will be called upon to provide interpretation either in person or over the phone. If bilingual staff persons are unavailable, the employee will call the Language Services Associates service and request an interpreter to provide immediate interpretation either for a walk-in or a telephone encounter. The process is outlined as follows:

Telephonic Interpretation-

Finance employees can get an immediate, over-the-phone interpreter by calling the vendor, Language Services Associates. This service is available 24/7.

To initiate the process, call 267-318-4473 and enter access code/PIN: 1000. Provide the following information when greeted by a coordinator: Department name, division/office name, and your name.

- If an LEP individual requests interpretation for a future scheduled meeting, telephonic or in-person interpretation may be used. The process is outlined as follows:

Pre-scheduled Interpretation-

Finance employees can request an in-person interpreter by contacting the following vendor: *Nationalities Service Center*. This service is available 24/7; however, the request must be made at least 48 hours in advance of the appointment date.

To submit a request online, visit www.nscphila.org/language-access-services/request-services

- Fill out service request form and select “interpretation”
- You will receive an email confirmation after the interpreter has been confirmed
- Be sure to cancel one day in advance, if possible, if interpreter is no longer needed

B. 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 seek to provide translations, at no cost, for LEP individuals. This includes translations of vital documents and signage.

2. Protocols

Finance has developed a list of vital documents related to offered services:

- Risk Management: “General Claim Information Form” (and cover letter) and “Special Event Liability Insurance Application.” These documents are being translated into Spanish. Finance will request translation into other languages as needed.

3. Procedures

To submit a document for translation:

- a. Email the editable document to the Office of Immigrant Affairs (OIA) – Language Access Program Manager at Maria.Giraldo-Gallo@phila.gov.
- b. OIA will submit the translation request to translation vendor to obtain a quote.
- c. OIA will email you a quote with a time estimate for delivery of the translation.
- d. To approve translation, Finance must sign and email quote back to OIA.
- e. Once translation is completed, OIA will email the documents to you.

Note: Before submitting a document for translation, please review the document and ensure the following:

- The document is in a format that can be edited (MS Word, Publisher, etc.)
- Terms you do not want to be translated are highlighted (i.e. the name of your unit, program, or street address).
- The document is written so it can be understood by readers with lower literacy skills.
- If the translation is a continuation of a series or collection of documents, you may request the same vendor to keep the translation consistent or provide previous translated materials to a new vendor to ensure consistency.

C. BILINGUAL STAFF

1. Current staff who have expressed interest in volunteering to support LEP individuals are listed below:

	Languages Spoken	Number of Staff
	Vietnamese	2
	Cantonese	1

Total	Mandarin	1
	Malayalam	1
	4	5

D. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS

1. Finance will circulate this language access policy and related protocols to all staff within 30 days after adoption.
2. After every policy revision, Finance will circulate the revised policy and protocols to all staff after adoption.
3. Within twelve months of the adoption of this policy, all staff who have regular interaction with LEP individuals will receive cultural competency training given by the Office of Immigrant Affairs, as well as training in regard to this policy.
4. It is Finance’s policy that new employees will receive a copy of this policy as part of their orientation.
5. All new staff members who will have regular interaction with LEP individuals will receive training on how to use language services within six months of the beginning of their employment in their new position.

LEP training will include information on the following topics:

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

IV. 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 – such as “*Free interpreter services are available. Please ask for assistance*” – and will be available in English as well as in Spanish.
- Document taglines informing the public of their right to translation and interpretation will be explored.

The Finance coordinator will work with OIA and other Finance area coordinators to request these materials from OIA.

V. DATA COLLECTION AND ANNUAL REPORT

A. DATA COLLECTION

The following information will be monitored and collected and will be collected via annual reports:

- Number of telephonic interpretation occurrences by language
- Number of documents translated
- Language services expenditures
- Number of bilingual staff
- Number of staff trained in language access/cultural competency

B. ANNUAL REPORT

1. Finance will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness, and identify new goals or strategies for serving LEP individuals. The evaluation will include the following:
 - Assessment of the use of telephonic interpretation, in person interpretation, and translation services.
 - Assessment of the number and type of language requests.
 - Assessment of whether the staff understand the Language Access Plan and procedures, how to carry them out, and whether language assistance resources are up-to-date and accessible.
 - Assessment of any complaint information
2. Evaluation results and recommended changes will be shared by OIA's Language Access Coordinator and incorporated into the annual report which is required to be filed under Philadelphia Home Rule Charter § 8-600.

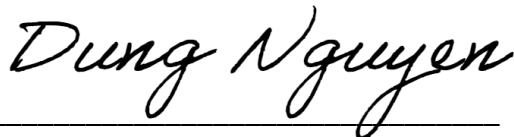
VI. LANGUAGE ACCESS COMPLAINT PROCEDURE

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 (which will be available on OIA's website) and submitted in person, by mail, or by email to:

Office of Immigrant Affairs
Maria Giraldo Gallo
Language Access Program Manager
Municipal Services Building
1401 JFK Blvd., 14th floor, Suite 1430
Philadelphia, PA 19102
Email: Maria.Giraldo-Gallo@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 (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



Language Access Coordinator
Office of the Director of Finance



Finance Director
Office of the Director of Finance