# Department of Public Health - Ambulatory Health Services Language Access Plan

## Purpose of Authority

The purpose of this document is to establish an effective plan and protocol for the Department of Public Health, Ambulatory Health Services 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 providing high quality services to patients and clients.

### **General Policy**

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 Health, Ambulatory Health Services intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Division of Ambulatory Health Services seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

### Language Access Coordinator or Committee

## Language Access Coordinator

Vanessa Johnson, Health Center Director City of Philadelphia Department of Public Health- Ambulatory Health Services 555 S. 43<sup>rd</sup> St. Philadelphia, PA 19104 (215) 685-7521

Cheryl Kramer, Director of Operations City of Philadelphia Department of Public Health- Ambulatory Health Services 500 S. Broad St. floor 2 (215) 685-6786

#### **Direct Contact with LEP Individuals**

The Department of Public Health- Ambulatory Health Services has several points of contact with the public:

The Department of Public Ambulatory Health Services' points of contact with the public include:

• In person Face to Face contact - LEP patients' needs will be met by bilingual staff, interpreters, and through the use of language access lines

• Telephone contact – LEP patients' needs will be met by bilingual staff, interpreters, and through the use of language access lines

# Language Access Services and Protocols:

### Interpretation

To ensure that the inability to communicate in English does not deprive patients of rights and privileges, the Department of Public Health- Ambulatory Health Services will continue to provide an interpreter, at no cost to the patient, for LEP individuals. Services offered include telephonic interpretation and in person interpretation.

When a request for an interpreter is made either orally, in writing or by pointing to a language card, the employee shall determine whether interpreter staff onsite are available to interpret or if the language access line should be utilized.

Personnel will provide LEP persons with services pursuant to the following procedures:

- The language in which patients wish to receive services is accommodated through the use of bilingual staff, onsite interpreters and language access lines
- When an LEP patient is identified, their language of choice is noted in their medical record, making staff aware that interpreter services will be needed.
- When an LEP patient calls the health center for services, bilingual staff, an interpreter, or the Language Access line is used.

## Procedures:

Ambulatory Health Services is charged to assist LEP patients by providing necessary services to meet their needs. When LEP patients request services, their needs are addressed by onsite interpreters, bilingual staff and through the use of designated language access services outlined below:

- Language Services Associates (Telephonic & In-Person Interpretation) Contract ID 1420294
- Nationalities Service Center (Document Translation & In-Person Interpretation) Contract ID 1420277
- Geneva Worldwide- Document Translation
- Language Line Services (Telephonic Interpretation) Contract ID 1420274

## Future Plans:

The Department of Public Health- Ambulatory Health Services recognizes the growing number of diverse and multi-lingual speaking patients and the increasing need for LEP services. The future plans for the Division of Ambulatory Health Services, is to ensure that the public is aware of the availability of these services, by continuing to provide onsite

interpretation, telephonic interpretation, signage, brochures, website information and by training and educating staff. The Division will also continue to schedule language access services for future appointments, scheduled appointments, walk-in services, and continue to hire and allocate for interpreter staff and positions.

## Signage and Translation documents:

The Department of Public Health- Ambulatory Health Services has signage located throughout its locations that assist LEP patients in obtaining services. Some signage includes:

- Welcome signs
- Covid documentation
- Urgent Care documents
- Rights and Responsibilities
- Services provided
- Signage informing patients that they have the right to Language Access Services
- Language line instructions
- Instructions on how to request an interpreter through Interpretalk
- Pharmacy instructions on how to apply for affordable prescription plans

## Services provided through translation:

In an effort to provide ongoing language access services to patients, the division will continue to provide translation services. This includes translation of signage, brochures and routine and vital documents.

## Protocols for Document Translation:

Vital documents – vital written documents include but are not limited to: consent and complaint forms with the potential for important consequences; written notices of rights, notices of denial, losses or decreases in benefits or services; signs; and notices advising LEP individuals of free language assistance services.

## Procedure for submitting a document for translation:

- Email the editable document to the Office of Immigrant Affairs (OIA)- Language Access Program Manager at <u>Maria.Giraldo-Gallo@phila.gov</u>
- OIA will submit the translation request to the translation vendor to obtain a quote
- OIA will email a quote with a time estimate for delivery of the translation
- Quote must be authorized by person with authority
- Quote is then signed and emailed to OIA
- OIA will email the translated documents

Website

The Department of Public Health- Ambulatory Health Services provides language access services to the public by including an "other languages" tab on its website that provides resources and instructions in other languages to LEP individuals on how to receive services.

# Future Plans

The future plans for the Department of Public Health- Ambulatory Health Services for improving already established translation services and protocols is to continue to write public materials in plain English for easier translation. DOHMH's Publications and Language Access group housed within the Office of External Affairs will continue to edit public materials for plain language and to translate important agency documents and health education materials. Translation services are centralized at DOHMH's to ensure that translations are clear and consistent.

Resources include telephonic language services such as Language Line Solutions and other translation vendors that perform quality-assurance products and full time translators. The agency has a central budget for translation services in order to encourage broad translation of public materials. Ambulatory Health Services will continue to make resources widely known throughout all health centers and will continue to enforce agency protocols that support high quality translations.

# Bilingual Staff

The following table list interpreters and staff that are competent to deliver services in a second language:

Last Name	First Name	Title	Name and Title of Employee's Supervisor	Foreign Language Spoken	
					Work Location
Carvalho	Silvia	Interpreter	Joan Bland, HC Director		HC10
			Sara Enes Thorpe, HC		
Chevalier	Catherine	Spanish Interpreter	Director	Spanish	HC2
Chowdhury	Lina	Interpreter	Joan Bland	Portugese	HC10
Ferdinand	Yolette	Interpreter	Joan Bland, HC Director	Creole, French	HC10

## Staff that serve as interpreters:

Garcia - Ortiz	Anahi	Spanish Interpreter	Sara Enes Thorpe, HC Director	Spanish	HC2
Offiz	Allalli	Spanish interpreter	Director	Spanish	1102
Hinhar Leung	Susanna	Cantonese/Mandarin Interpreter	Joan Bland, HC Director		HC10
Luna	Yeisy	Interpreter	Shainy Thaiparambil, HC Director	Spanish	HC6
Martinez	Michael	Interpreter	Joan Bland, HC Director	Spanish	HC10
Martinez	Wanda	Interpreter	Joan Bland, HC Director	Spanish	HC2
Mathew	Sally	Interpreter	Joan Bland, HC Director	Malayalam	HC10
Melendez	Enid	Interpreter	Shainy Thaiparambil, HC Director	Spanish	HC6
Preap	Bunara	Interpreter	Sara Enes Thorpe, HC Director	Cambodian	HC2
Reiner	Snow	Interpreter	Sara Enes Thorpe, HC Director	Vietnamese	HC2
Santana Linarez	Madelin	Interpreter	Health Center Director	Spanish	HC6
Tsang Chan	Jenny	Mandarian Interpreter	Sara Enes Thorpe, HC Director		HC2
Utojohardjo	Agnes	Interpreter	HC Directors	Indonesian	HC10

AHS				Civil	Contract
Agnes	Tarpeh	Female	Kru	X	
Agnes	Utdjohardjo	Female	Indonesian		X
Albana	Teme	Female	Albanian		X
Alicia	Shovlin	Female	Spanish	X	
Ana	Arias	Female	Spanish	X	
Anahi	Garcia	Female	Spanish		X
Anna	Bachman	Female	French	X	
Anu	Palackal	Female	Malayalam, Hindi	X	
Archana	Kallumpurathu	Female	Malayalam	X	
Armando	Aponte	Male	Spanish		X
Betcy	George	Female	Malayalam	X	
Bilin	Zacharia	Male	Malayalam, Hindi	X	
Binoy	Kanikunnil	Male	Malayalam	X	
Blake	Marshall	Male	Spanish	X	
Blanca	Gomez	Female	Spanish	X	
Blessy	Methikalam	Female	Malayalam, Spanish	X	
Bunnara	Preap	Female	Cambodian		X
Cheyce	Ruiz	Male	Spanish		X
CHINNU	Alex	Female	MALAYALAM	X	
Christianah	Fatiregun	Female	Yoruba, French	X	
Christine	Phan	Female	Vietnamese	X	
Cynthia	Venegas	Female	Tagalog	X	
Deepthi	Foxhall	Female	Spanish, Kannada	X	
Dhanya	Roshan	Female	Malayalam, Hindi	X	
Dina	Krisjanto	Female	Indonesian	X	
Dorothy	Espinoza	Female	Spanish	X	
Dorothy	Nwakpuda	Female	Igbo	X	
Elisbeth	Hernandez	Female	Spanish	X	
Elizabeth	Mbaya	Female	Swahili	X	
Elizabeth	Reyes	Female	Spanish	X	
Elizabeth	Jacob	Female	Malayalam, Hindi	X	

Enid	Melendez	Female	Spanish		X
Esmeralda	Kaye	Female	Spanish	X	
Farhad	Emami	Male	Farsi,	X	
			Persian		
Fatema	Ahmed	Female	Hindi, Urdu,		X
<b>F</b>	Common and a	N/ 1	Bengali	V	
Frank	Sarpong	Male	Twi	X	
Gisley	Perez	Female	Spanish	X	
Gracie	Anothony	Female	Malayalum	X	
Haseeda	Salam	Female	Malayalum	<u>X</u>	
Huatine(Eileen)	Zheng	Female	Mandarine,	X	
Ilung	Nauvon	Male	Cantonese	X	
Hung	Nguyen		Vietnamese		
Irene	Alvarez	Female	Spanish	<u>X</u>	
Issy	Esangbedo	Female	French	X	
Iventiza	Ortiz	Female	Spanish		X
Jennifer	Quintana	Female	Spanish	X	
Jenny	Tsang Chan	Female	Mandarine,		X
1		N/ 1	Cantonese	V	
Jerry	Brown	Male	Spanish	X	
Jessy	Thomas	Female	Malayalam, Hindi	X	
Jia	Chen	Female	Madarin		X
Jitendra	Shah	Female		X	<u>Λ</u>
Jitenuru	Shun	remule	Gujarati, Hindi	Λ	
Jonathan	Quach	Male	Cantonese,	X	
Jonathan	quatin		Madarin		
Joseph	Forson	Male	French	X	
Julie	Cherian	Female	Malayalam	X	
Keimah	Johnson	Female	French	X	
Kewsi	Ghanney	Male	Fante, Ga,	X	
			Twi		
Khudsiya	Khan	Female	Urdu	X	
Kinjalben	Patel	Male	Hindi,	X	
-			Gujarati		
Laura	Hribar	Female	Spanish	X	
Leena	Vadaketh	Female	Malayalam	X	
Leji	Abraham	Female	Malayalam	X	
Lenu	Mathew	Female	Hindi,	X	
			Malayalam		
Lenymol	Thomas	Female	hindi,	X	
			Malayalam		

Lilia	Gorovitia	Female	Russian	X	
Ling	Lowell	Female	Chinese, Taiwanses	X	
Lisa	Gauthier	Female	Spanish	X	
Lisa	Shah	Female	Hindi,	X	
			Gujarati		
Liza	Chan-Green	Female	Chinese	X	
LOKADRI	Ramanani	Male	Hindu	X	
Margaret	Umabong	Female	Ibibio	X	
Margarita	Gonzales	Female	Spanish	X	
Maria	Fedorova	Female	Russian	X	
Marie	Flavien	Female	Frence, Creole		X
Marie	Piere	Female	French,	X	
			Creole		
Mariejude	Joseph	Female	Creole	X	
Martin	Medina	Male	Spanish		X
Melchor	Pedraza	Male	Spanish		X
Melinda	Su	Female	Cantonese	X	
Mercy	Isaac	Female	Malayalam	X	
Meredith	McClure	Female	Spanish		X
Michael	Martinez	Male	Spanish		X
Michele	Flavien	Female	French,		X
			Creole,		
			Spanish		
Michelle	Wan	Female	Cantonese		X
MILLEN	Gebreselassi	Female	Amharic and		
1.61	** 1 *1 *		Tigrigna		
Mimoza	Habilaj	Female	Albanian		X
Mina	Mark	Female	Hebrew	X	
Mingchu	Huynh	Female	Mandarin,		X
			Cantonese, Vietamese		
Minimol	George	Female	Malayalam	X	
Mina	Gohel	Female	Gujarati,		
MII U	Goner	remule	Spanish	Λ	
Mirelsa	Borges	Female	Spanish	X	
Neethu	Koshy	Female	Malayalam	<u>X</u>	
Nghi		Female	Mandarin,		
	240		Cantonese,		
			Vietamese		
Nicholas	Vo	Male	Vietnamese	X	

Nidhin	Paul	Female	Malayalum, Hindi	X	
Norma	Carandang- Panis	Female	Japanese, Filipino	X	
Ponnamma	Yohannan	Female	Malayalam, Hindi	X	
Princy	Shaji	Female	Malayalam	X	
Priscilla	Martinez	Female	Spanish	X	
Raji	Jospeh	Female	Malayalam	X	
Ratha	Rann	Female	Cambodian	X	
Rebecka	Ly	Female	Cambodian	X	
Rita	Eburuoh	Female	Ibo	X	
Robin	Cananda	Female	Spanish	X	
Rosamma	Eapen	Female	Malayalum	X	
Roy	Hoffman	Male	Hebrew, Spanish	X	
Saji	Phillip	Female	Hindi, Malayalam, Urdu	X	
Sally	Matthew	Female	Malayalam		X
Salustiano	Rosario	Male	Spanish	X	
Sanaa	Lahrizi	Female	Arabic, French		X
Sasha	Divikar	Female	Hindi, Telugu	X	
Shainy	Thaiparambil	Female	Malayalam, Hindi	X	
Sharon	Lim	Female	Tagalog	X	
Sheeba	Anooj	Female	Malayalam	X	
Shuyi	Chen	Female	Mandarine, Cantonese		X
Simi	Joseph	Female	Malayalum	X	
Snow	Reiner	Female	Vietnamese		X
Sompors	Uon	Female	Cambodian	X	
Steve	Han	Male	Korean	X	
Suela	Teme	Female	Albanian		X
Sumimol	Karvally	Female	malayalam	X	
Tanya	Inanova	Female	Russian	X	
Tessy	Pothen	Female	Malayalam, Hindi	X	
Thara	Jaison	Female	Hindi, Malayalam, Urdu	X	

Tiffany	Yang	Female	Madarin,		X
			Cantonese,		
			Taishanese		
Тотту	Ng	Male	Madarin,		X
			Cantonese		
Valerie	Bonica	Female	Spanish	X	
Vanessa	Lopez	Female	Spanish	X	
Vinh	Su	Male	Chinese	X	
Vladimir	Perelshteyn	Male	Russian	X	
Wanda	Martinez	Female	Spanish		X
Wanda	Torres	Female	Spanish	X	
Yanni	Zhu	Female	Madarin,		X
			Cantonese,		
			Taishanese		
Yashira	Santos	Female	Spanish		X
Yasmine	Pizarro	Female	Spanish	X	
Yelena	Galkin	Female	Russian	X	
Yollette	Ferdinand	Female	Creole,		X
			French		
Yolanda	Maldonado	Female	Spanish	X	
Yoon	Park	Female	Korean	x	
Yvonne	Claudio	Female	Spanish		X
Zaira	Moldonado	Female	Spanish	X	
Zarna	Shah	Female	Hindi, Jurati	X	

#### Future Plans:

The Department of Public Health- Ambulatory Health Services plan for building in house language capacity is by:

- A) Hiring Ambulatory Health Services continues to develop in house language capacity through regular hiring of employees with specific language skills. On an ongoing basis, job openings will be designated appropriately, and the Personnel Office will be notified of hiring needs for bilingual staff.
- Reclassify an existing posting. If the need for interpretation and translation services is high and expected to be long term, a position may be redefined to include the required language skills and request Human Resources to study the work and create the position. This request would be made before filling the position.
- The Department will include the language skill as a desirable qualification in the job announcement.
- If bi-lingual or multilingual skills are included in the job description, a candidate's language proficiency will be addressed as part of the selection process. Assessment may include:

- 1. Formal testing of language proficiency or interpreting /translation ability; and certification, transcripts, diplomas or other evidence of language proficiency in English or other language.
- 2. Selective Factor Certification Civil Service Commission Regulation 11.032 when a certification of eligible candidates with specified experience, education, training, license, registration, certification or skill is requested in writing by the appointing authority as being necessary by the appointed authority as being necessary for satisfactory performance in a particular position in an established class or series of classes, and the director determines that the reasons given fully justify the request, a certification may be made of the two highest rankings eligible candidates on the appropriate list who possess the specified qualifications. Selection of the eligible to fill the vacancy will then be made in accordance with Civil Service Regulations.
- B) Staff Interpreters Competent and trained bilingual staff will also function as interpreters, upon completion of appropriate training.
- C) Language Sensitive Assignments In the event that there is no interpreter available, trained bilingual staff may be utilized to assist in providing services as long as it does not impose an unfair burden.

# Training staff on Policy Plan and Protocols

The Department of Public Health- Ambulatory Health Services will distribute the LEP plan to all staff and will have a current electronic copy available so all staff will be knowledgeable of LEP policies and procedures.

## Future Plans

Future plans of the department will include working with frontline programs to update and standardize language access tools and resources across the agency. Ambulatory Health Services will work to ensure that all public facing programs have appropriate language access signage and materials at all sites.

#### Notice of the Right to Language Access

The department will notify the public of their right to language access through

- Posters notifying LEP individuals of their right to language services will be developed and displayed in areas of public contact.
- Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance
- Staff have access to the City of Philadelphia Language Access Cards. These are cards with a detachable wallet size card that say in both English and a second language "I speak (language) I need assistance in (language).
- In all areas of public contact and on its website, the Department of Public Health-Ambulatory Health Services will post and maintain clear and readable signs in the language most prevalent in the City notifying LEP individuals that free translation and interpretation are available to them.

# **Data Collection and Annual Report**

In order to ensure proper data collection, the following information will be required to be monitored and collected by Health Directors via quarterly reports through the use of the data collection sheet provided by the Office of Immigrant Affairs:

- Number of LEP encounters by language
- Type of language services provided to LEP patients/clients
- Number of documents translated
- Language services expenditures
- Number of bilingual staff
- Number of staff trained in Language Access/Cultural Competency

#### Annual Report/Evaluation

The Department of Public Health- Ambulatory Health Services will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness, review the progress of department goals and identify new goals or strategies for serving LEP patients and residents. The evaluation will include the following:

- Assessment of the use of telephonic interpretation, in person interpretation and translation services
- Assessment of data collected about the LEP's primary language
- Assessment of the number and types of language requests during the past year
- Assessment of whether the staff member understand the Language Access Plan and arrangements for those resources are up to date and accessible
- Assessment of complaint information
- Assessment of soliciting feedback from LEP individuals through surveys

#### Language Access Complaint Procedure

One may file a formal Language Access grievance with the Department of Public Health – Ambulatory Health Services Language Access Coordinator if you believe you have been wrongly denied the benefits of this Language Access Plan. 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 or by mail to:

Vanessa Johnson, Health Center Director City of Philadelphia Department of Public Health- Ambulatory Health Services 555 S. 43<sup>rd</sup> Street Philadelphia, PA. 19104

The form will also be available on the Department of Public Health – Ambulatory Health Services website.

Additionally, any person, regardless of immigration status, may submit a formal legal complaint through the Philadelphia Commission of Human Relations. To do so, please complete a Public Accommodations Discrimination Intake Form and submit in person or by mail:

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 <u>www.phila.gov/humanrelations</u>

## **Timeline for Implementation**

### Implementation Plan Logistics

Major milestones in our plan will include:

- Continuing to broadly translate and interpret
- Updating agency language access tools and resources
- Exploring additional training opportunities

### Timeline

## 2021-2022

- The Language Access Committee will meet regularly to discuss language access challenges, best practices, and methods for tracking language access data by program/site as well as brainstorm ideas for new or updated language access resources these staff might need.
- Ambulatory Health Services will update the Language Access Plan periodically to ensure that all information is relevant and update.
- Ambulatory Health Services will work closely with City Hall and will communicate with other City agencies about best tools and practices.
- Ambulatory Health Services will continue to broadly translate materials and provide onsite interpretation as needed and track these activities.
- Ambulatory Health Services will continue to train staff and meet with frontline staff to discuss language access and any emerging needs and challenges.

## **SIGNATURE PAGE**

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Language Access Coordinator Health Center Director Department of Public Health Ambulatory Health Services

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Date

Commissioner Department of Public Health

4/25/21

Date