



**PHILADELPHIA  
PARKS & RECREATION**

**Language Access Plan and Protocol**

**Philadelphia Parks and Recreation**

**2021**

## **Departmental Leadership**

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Chief of Staff

# 1. Purpose and Authority

In Cooperation with the Mayor’s Office, Philadelphia Parks and Recreation 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”).”

The purpose of this document is to establish an effective plan and protocol for Philadelphia Parks and Recreation 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 our mission to advance the prosperity of our city and the progress of its people through intentional and sustained stewardship of public land and waterways as well as through safe, stimulating recreation, environmental, and cultural centers. PPR helps Philadelphia’s children and other residents grow by connecting them to the natural world, to each other, and to fun, physical, and social opportunities.

## 2. General Policy

Philadelphia Parks and Recreation recognizes that the population eligible for services includes individuals who are Limited English Proficiency. It is the policy of Philadelphia Parks and Recreation to ensure meaningful access to LEP individuals. Philadelphia Parks and Recreation adopts the following policy to ensure that LEP individuals can gain equal access to Philadelphia Parks and Recreation services and communicate effectively. This plan applies to all Philadelphia Parks and Recreation offices and satellite offices.

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

Philadelphia Parks and Recreation, rather than the LEP customer, bears the following responsibilities:

- 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 services, 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.

### **Preferred Method of Services**

- The preferred method of serving LEP customers is by using competent bilingual staff 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 members 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.

## **3. Language Access Coordinator**

Chevelle E. Harrison

Language Access Coordinator

Philadelphia Parks and Recreation

1515 Arch St., 10th Floor

Philadelphia, PA 19102

## **4. Direct Contact with LEP Individuals**

1. Recreation Center Visitors - PPR has encountered several LEP individuals coming into recreation centers looking for help in obtaining services. In these instances, if there is no bilingual staff available to interpret, staff must then use telephonic interpretation.
2. Office calls - at times PPR front desk will receive calls from LEP individuals. In these instances, if there is no bilingual staff available to interpret, staff must then use telephonic interpretation.

## 5. Language Access Services and Protocols

### A. INTERPRETATION

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our department will continue to provide an interpreter, at no cost to the resident, for LEP persons pursuant to the following procedures:

- (1) An individual approaches an 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 either orally, in writing or by pointing to a language card. The employee shall then determine whether bi-lingual staff in the office is available who speaks the language being requested.

When bilingual staff are not available, the employee shall contact a telephone interpreter service to provide interpreter services with the process to do so outlined below:

#### Telephonic Interpretation

PPR has access to over-the-phone interpreters using the following vendors. These services are available 24/7:

United Language Group (ULG)

1. Provide the **Language Needed**
2. Provide your **Office Name**
3. Provide your **Last Name and First Name**
4. Do you need a **Third-Party Dial Out?**

GLOBO

1. Provide the **Language Needed**
- 2 Do you need a **Third-Party Dial Out?**
3. Provide your **Access PIN Code**

When an LEP person requests in-person interpretation for a future meeting, telephonic or in-person interpretation may be used. The process for requesting an in-person interpretation is below:

#### In-Person and Video Remote Interpretation

Staff can request an in-person interpreter by emailing **Chevelle Harrison, Language Access Coordinator** at [chevelle.harrison@phila.gov](mailto:chevelle.harrison@phila.gov). This service is available 24/7, but please give more than 48 hours' notice whenever possible. In an emergency, use a telephonic interpreter.

### **Future Plans-**

PPR will continue to use /make available telephonic interpretation, in-person and video remote interpretation for scheduled meetings and events to staff and the public. This will be achieved by training all staff on using telephonic interpretation services and informing the public about these resources through social media, and visible multilingual signs.

## **B. TRANSLATION**

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our department will continue to provide translations, at no cost, for LEP individuals. This includes translations of vital documents, signage, and portions of our website.

**Vital Documents** – PPR is in the process of determining which documents to provide in other languages and possibly redesigning forms to be bilingual.

### **Future Plans-**

After collecting data to determine our department's language needs, PPR will reevaluate translation of documents.

#### **Procedure for Submitting a document for translation:**

- Email the editable document to the Language Access Coordinator, Chevelle Harrison. Please include Chevelle on all emails for follow up purposes.
- The Language Access Coordinator will submit the translation request to the Language Access Vendor.
- The OIA will submit translation to vendor to obtain a quote.
- The Office of Immigrant Affairs will email the PPR Language Access Coordinator with a quote for approval.
- Quote must be authorized by Chevelle.
- Quote is then signed and emailed back to OIA.
- OIA will email PPR the translated documents.

**NOTE:** Before submitting a document for translation, staff will review documents and ensure the following:

The content has not already been translated in another document.

The document and translation procedure have been approved by your supervisor.

The document is in a format that can be edited (e.g. MS Word, Publisher, InDesign, etc.)

Terms that do not want translated are highlighted, i.e. the name of your unit, program or street.

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, staff may request the same vendor to keep the translation consistent.

### **C. BILINGUAL STAFF**

PPR will work in-house to identify bilingual staff.

#### **Future Plans-**

PPR will determine future plans after collecting data to illustrate the demand and need of language interpretation and translation.

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

The PPR Language Access Plan & Protocol will be posted online and provided as a one-page overview to all PPR staff members at hiring.

All staff providing technical assistance, training, or receiving inbound calls will receive annual LEP training, or training upon employment, and then annual refreshers.

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;
- Documenting LEP individual's language preference;
- Obtaining interpreters (in-person and over-the-phone);
- Using and working with interpreters (in-person and over-the-phone);
- Translating procedures;
- Documenting language requests; and
- When to use or not use bilingual staff as interpreters.

PPR will circulate this language access policy and related protocols to all staff within 60 days after adoption. Every two years, PPR will circulate the revised policy and protocols to all staff after adoption. After their initial training, all staff members will receive refresher training in cultural competency and language access every two years.

In order to establish meaningful access to information and services for LEP individuals, staff that regularly interact with the public and those who will serve as interpreters will be trained on the PPR LEP policy, plan, and protocols. Training will ensure that staff members are effectively able to work in person and/or by telephone with LEP individuals. Management staff will be included in this training, even if they

do not interact regularly with LEP individuals, to ensure that they fully understand the policy, plan, and protocols so they can reinforce their importance and ensure implementation.

New staff training will be provided during the Onboarding Process on the PPR Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

#### **Future Plans-**

Further standardize language access resource and tools across PPR. PPR will work with internal subdivisions to update and standardize language access tools and resources across the agency. PPR will also work to ensure that all public-facing programs have appropriate language access signage and materials in multiple languages available at sites. Another goal is to update the agency's language database of staff who speak languages other than English and who are willing to help review translated materials and/or assist with interpretation in emergencies.

#### **E. ADMINISTRATIVE HEARINGS**

This section applies does not apply to Philadelphia Parks and Recreation at this time.

## **6. Notice of The Right to Language Access**

Posters notifying LEP individuals of their right to language services will be developed and 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 in English as well as the principal languages spoken in the service area.

Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.

Taglines will be included in or attached to a document. Taglines in languages other than English can be used on documents written in English that describe how individuals with LEP can obtain translation of the document or an interpreter to read or explain the document. PPR will contact the OIA for support in creating taglines.

In all areas of public contact, PPR will post and maintain clear and readable signs in the languages most prevalent in the City notifying LEP individuals that free translation and interpretation services are available to them.



## 7. Data Collection and Annual Report

The following information will be required to be monitored and collected by front-line staff and will be aggregated via annual reports by PPR:

1. Number of LEP encounters (By Language), ASL encounters, when they occurred and total time of interaction
2. Type of Language Services Provided to LEP Customers
3. Number of Documents Translated
4. Language Services Expenditures

Additionally, Language Access Coordinators will be required to report quarterly on the following:

1. Number of bilingual staff
2. Number of staff trained in Language Access/Cultural Competency

PPR 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 residents. The designated staff will lead the evaluation with the assistance of the Director. The evaluation will include the following:

- a. Assessment of the use of telephonic interpretation, in-person interpretation and translation services.
- b. Assessment of data collected about the LEP's primary language.
- c. Assessment of the number and types of language requests during the past year.
- d. 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.
- e. Assessment of complaint information; and
- f. Assessment of soliciting feedback from LEP individuals and community groups.

The PPR Language Access Coordinator will track the number of individuals that are assisted or unable to be assisted by the person's language of choice. This information will be considered as part of the annual Language Access Plan report.

Evaluation results and recommended changes will be shared by PPR Language Access Coordinators and incorporated into annual report which is required to be filed under Philadelphia Home Rule Charter § 8-600. The Language Access Coordinator will also keep records of any language access services provided and will make this information available during the annual review process. In connection with updates to the Language Access Plan, PPR may use some of the following tools to conduct further assessment:

- Request comments and feedback from visitors that have received language services.

-Establish a tracking system to collect primary-language data for individuals that participate in programs and activities.

## 8. Language Access Complaint Process

You 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 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, by mail or e-mail 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  
E-Mail: [maria.giraldo-gallo@phila.gov](mailto:maria.giraldo-gallo@phila.gov)

The form will also be available on the OIA website.

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)

## 9. Signature Page

*Chevella E. Harrison*

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**Chevella E. Harrison**  
**Language Access Coordinator**  
Philadelphia Parks and Recreation

*Kathryn Ott Lovell*

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**Kathryn Ott Lovell**  
**Commissioner**  
Philadelphia Parks and Recreation