

THE CITY OF PHILADELPHIA
— OFFICE OF —
SUSTAINABILITY

Office of Sustainability Language Access Plan

1. Purpose and Authority

In Cooperation with the Mayor's Office, the Office of Sustainability 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).

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

3. Language Access Coordinator or Steering Committee

Language Access Coordinator
Christine Knapp
Director, Office of Sustainability
1515 Arch St, 13th Floor
215-686-4471
christine.knapp@phila.gov

4. Direct Contact with LEP Individuals

The Office of Sustainability has several points of contact with the public:

- Website, blog and social media- The City website provides translation services by default. OOS will review online materials periodically and select appropriate materials for translation.
- Meetings, workshops and information sessions- At times OOS will hold meetings, workshops or information sessions. If language needs are anticipated, OOS will utilize interpretation services for appropriate languages.

5. 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, the Office will provide an interpreter, at no cost to the resident, for LEP individuals. Services offered include telephonic interpretation and in person interpretation.

2.) Protocols

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 determine whether bi-lingual staff in the office is available who speaks the language being requested.

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:

3.) Procedures

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

Telephonic Interpretation –

OOS staff can get an over-the-phone interpreter by contracting GLOBO. This service is available 24/7. GLOBO will require the department name, division and a pin number. Staff should request this through their office Language Access Coordinator

In-Person Interpretation –

OOS staff can request an in-person interpreter by contacting Nationalities Service Center. This should also be requested through their Language Access Coordinator

4.) Future Plans

OOS will continue to inform the public about these resources through social media, visible multilingual signs and will train all of its staff on accessing interpretation services.

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 continue to provide translations, at no cost, for LEP individuals. This includes translations of vital documents, signage and portions of our website.

2.) Protocols

All OOS vital documents will be translated and made available to LEPs. OOS will work with the Office of Immigrant affairs to determine which languages would be most appropriate depending on the intended target audience. Vital documents include but are not limited to intake and application forms with the potential for important consequences. Additional documents may be considered for translation by OOS staff depending on the information, intended audience and potential impact of the information.

OOS has created list of the documents that should be accessible to all Philadelphians, including LEP persons. Documents that have been translated include:

- Signage at the front desk indicating the availability of interpretation services (multiple languages)
- Greenworks on the Ground (Spanish)
- Philadelphia Climate Action Playbook (Spanish)
 - Climate Action Playbook Public Survey and Survey Results (Spanish)
- Greenworks Review 2020 (Spanish)
- Beat the Heat Hunting Park: A Community Heat Relief Network (Spanish)
 - Beat the Heat surveys, informational flyers, and other forms (Spanish)
- Plastic Bag Ban signage (Spanish, Simplified Chinese, Khmer, Korean, French, Russian, Vietnamese)
- Environmental Justice Advisory Commission application materials and press release

Additional materials that OOS will consider for translation

- Greenworks Review 2022
- Sustainable Business tax credit (with Revenue)
- OOS website

3.) Procedures

1.) Procedure for Submitting a document for translation:

- a. Email the editable document to the Language Access Coordinator
- b. Coordinator will submit to OIA and/or the translation vendor to obtain a quote.
- c. Vendor will provide a quote with a time estimate for delivery of the translation.
- d. Quote must be authorized by person with authority.
- e. Quote is then signed and emailed back to OIA and vendor.
- f. Vendor will email you the translated documents.

NOTE: Before submitting a document for translation, please review your document 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 you 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, you may request the same vendor to keep the translation consistent.

4.) Signage

OOS will display a sign at our receptionist desk that indicates that an LEP person may request translation services

5.) Website

Sections of the website may also be translated, including the About Us page, the Contact Us form, and some of the Resources listed.

6.) Future Plans

OOS will continue to use translation services and ensure that the public knows about the availability of these services. OOS will continue to inform the public about these resources through social media, visible multilingual signs and will train all of its staff on using telephonic interpretation services.

C. Bilingual Staff

1.) Current Staff- Two (2) staff current identify as bilingual although are not trained as interpreters nor do they have interpretation included as part of their job description.

2.) Future Plans - OOS will track requests for translation or interpretation services to make a determination if further efforts should be made to recruit bilingual staff with interpretation as a key component of their job description.

D. Training Staff on Protocols and Procedures

1.) Protocol

The Office of Sustainability 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. Every two years, OOS will circulate the revised policy and protocols to all staff after adoption. New staff will be provided the Language Access Plan and be provided guidance on how to effectively communicate with LEP residents.

2.) Future Plans

OOS is committed to racial equity and environmental justice. New staff go through racial equity training as part of their onboarding and all staff are given access to various racial equity training that supports cultural competency.

E. Administrative Hearings- Not applicable

6. Notice of the Right to Language Access

A sign notifying LEP individuals of their right to language services will be developed and displayed in areas of public contact. The sign will read 'Free Interpreter services are available. Please ask for assistance.' - and will be in English as well as the principle languages spoken in the service area.

7. Data Collection and Annual Report

The following information will be required to be monitored and collected by OOS and submitted via annual reports to the Office of Immigrant Affairs:

- (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
- (6) Number of staff trained in Language Access/Cultural Competency

OOS 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 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.

Evaluation results and recommended changes will be shared by OOS and incorporated into an annual report, which is required to be filed under Philadelphia Home Rule Charter § 8-600. The OOS Language Access Coordinator will also keep records of any language access services provided and will make this information available during the annual review process.

8. Language Access Complaint Process

Any individual may file a formal Language Access grievance with the Office of Sustainability 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, you must fill out a Language Access Grievance Form and submit the form in person, by mail or e-mail to:

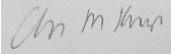
Maria Giraldo Gallo
Language Access Program Manager
Office of Immigrant Affairs
(215) 686-0876
Maria.Giraldo-Gallo@phila.gov

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 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

9. Signature Page



Language Access Coordinator
Director
Office of Sustainability

2/11/22_____

Date