

**Philadelphia Water Department:
Language Access Plan**
(Updated March 2022)

TABLE OF CONTENTS

Purpose and Authority 3

General Policy 4

Language Access Coordinator 5

Direct Contact with Limited English Proficient (LEP) Individuals 6

Language Access Services and Protocols 7

A. Interpretation 7

 1. Services Provided

 2. Protocols

 3. Procedures

 4. Future Plans

B. Translation 8 - 10

 1. Services Provided

 2. Protocols

 3. Procedures

 4. Website

 5. Notification Letters

 6. Future Plans

C. Bilingual Staff 10 - 11

 1. Current Staff

 2. Future Plans

D. Training Staff on Protocols and Procedures 11 - 12

 1. Protocol

 2. Future Plans

Notice of the Right to Language Access 13

Annual Report and Evaluation..... 14 - 15

Language Access Complaint Process..... 16

Timeline for Implementation17

 1. Timeline Through December 2022

 2. Timeline Through December 2023

Signature Page 18

PURPOSE AND AUTHORITY

In cooperation with the Mayor's Office, the Philadelphia Water Department (PWD) is committed to compliance with Title VI of the Civil Rights act of 1964, 2 C.S. & 561 et seq. (Act 172 of 2006) the Philadelphia Home Rule Charter & 8-600 and & A-200, Executive Order 7-16 and revised and updated Managing Director Directive 62, 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 PWD personnel to follow when providing services to, or interacting with, individuals who have LEP.

Following this plan and protocol is essential to the success of our mission to serve the Greater Philadelphia region by providing integrated water, wastewater, and stormwater services. PWD plans for, operates, and maintains both the infrastructure and the organization necessary to purvey high-quality drinking water to provide an adequate and reliable water supply for all household, commercial, and community needs, and to sustain and enhance the region's watersheds and quality of life by managing wastewater and stormwater effectively.

PWD recognizes the importance of effective and accurate communication between its employees and the communities we serve and will accomplish our language access goals primarily through services provided by City-contracted language access vendors in the areas of telephonic and in-person interpretation and document translation.

PWD will continually work with community stakeholders to evaluate its services and identify ways to refine and/or expand them. As a result, we expect these strategies, services, and programs to evolve over time.

GENERAL POLICY

It is the policy of the PWD to ensure meaningful access to LEP individuals. PWD adopts the following policy to ensure that LEP individuals can gain equal access to PWD services and communicate effectively. This plan applies to all PWD offices and satellite offices.

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. PWD intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. PWD seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

PWD, rather than the LEP customer, bears the following responsibilities:

1. Providing language appropriate services.
2. Staff at the initial point of contact have the specific duty to identify and record language needs.
3. Use of informal interpreters such as family, friends of the person seeking service, or other customers must be discouraged.
4. Minor children are prohibited from acting as interpreters.
5. No staff may suggest or require that an LEP customer provide an interpreter to receive services.

The preferred method of serving LEP persons is by:

1. Staff should seek assistance from professional in-person or telephonic interpreters and translation services when staff cannot meet language needs.
2. Departments should recognize that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available.
3. Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.

LANGUAGE ACCESS COORDINATOR

PWD has appointed a Language Access Coordinator (LAC) to implement and monitor its language access services. This representative serves as a liaison between PWD and the Office of Immigrant Affairs to communicate with LEP communities through established organizations.

Language Access Coordinator

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Philadelphia Water Department

DIRECT CONTACT WITH LIMITED ENGLISH PROFICIENT (LEP) INDIVIDUALS

PWD has several points of contact with the public:

- Customer Contact Center – PWD uses a 24-hour telephone information hotline for customers to report emergencies. Service and other information requests are handled during normal business hours, 8:00 a.m. – 5:00 p.m. Customer Contact Center staff primarily uses telephonic interpretation but also has bilingual staff to provide interpreter and translation services in select languages.
- Field units – PWD field staff, including Customer Field Services, Meter Shop, Delinquency and Restoration (D&R), Distribution, Sewer Maintenance, Inlet Cleaning and Construction, often interact with the public to alert them of service interruptions, repair work, or other emergency-related construction work that may require language access services. If no bilingual staff is available to interpret, field units use telephonic interpretation to communicate.
- Document Translation – PWD uses several documents to communicate important information to customers about our services, requirements, updates, and goals. PWD provides translations of key informational materials and forms through Office of Immigrant Affairs (OIA) vendors.
- Meetings/Information Sessions – PWD occasionally holds meetings or information sessions and will utilize in-person interpretation for the appropriate language if language access services are anticipated.
- Office walk-ins – There are times when LEP individuals come into PWD offices looking for help in obtaining services. If there are no bilingual staff available, telephonic interpretation is used to communicate.

LANGUAGE ACCESS SERVICES AND PROTOCOLS

A. Interpretation

1. Services Provided

- i. PWD will continue to provide an interpreter, at no cost to the resident, for Limited English Proficient (LEP) individuals. Services offered include telephonic interpretation and in-person interpretation.

2. Protocols

- i. PWD will continue to provide an interpreter, at no cost to the resident, for LEP persons pursuant to the following procedures:
 - An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or;
 - 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 a request for an interpreter is made either orally, in writing, or by pointing to a language card, the employee shall provide telephonic interpretation in the language requested.

3. Procedures

- i. When bilingual staff is unavailable, the employee shall contact a telephone interpreter service to provide interpreter services using the process outlined below:
 - Telephonic Interpretation: Over-the-phone interpreters can be accessed by calling one of the Office of Immigrant Affairs vendors that provide telephonic interpretation: United Language Group (ULG) or GLOBO. This service is available 24/7.
 - a. To submit a request to ULG:
 1. Call 1-800-689-XXXX
 2. Provide the requested language to the operator
 3. Provide your payroll number

- b. To submit a request to GLOBO:
 1. Call 267-318-XXXX
 2. Enter Pin #: XXXX
 3. Select Language
- ii. When a Limited English Proficient (LEP) person requests in-person interpretation for a future meeting, the process for requesting an in-person interpretation is below:
 - In-Person Interpretation: Requests for an in-person interpreter can be made by emailing PWD’s LAC at least 48 hours in advance:
Satterria.Kersey@phila.gov
Laura.Copeland@phila.gov
 - Cancellation of In-Person Interpreter: If a request for in-person interpreter needs to be cancelled, email the LAC to cancel the request at least one full business day in advance of the scheduled time (if possible.)

4. Future Plans

- i. Public Awareness. PWD will continue to make our customers aware of the availability of in-person and telephonic interpretation by using tag lines on informational materials, social, and visible multilingual signs.

B. Translation

1. Services Provided

- i. To ensure that the inability to communicate in English does not deprive the public of rights and privileges, PWD will continue to translate vital documents, signage, and portions of our website.

2. Protocols

- i. PWD has developed a list of the documents that are vital to the access of LEP persons to PWD’s programs. PWD currently provides some vital documents in the following languages: Arabic, Italian, Khmer (Cambodian), Portuguese, Russian, Simplified Chinese, Spanish, Traditional Chinese, and Vietnamese. These languages may be reviewed on an annual basis as PWD does not limit its outreach to just the above languages.

Vital documents that have been translated include:

- Customer Assistance Program (CAP) Application
- Annual Water Quality Reports
- Rate Increase Fact Sheets
- Lead Program Fact Sheets and Materials
- Construction letters and door hangers
- Industrial Waste Warning and Violation Notices
- Intensive Cleaning/Rinse Lead from Service Pipe (Top 10 Languages)
- Daily Cleaning Tips/Faucet Aerators (Top 10 Languages)
- Check Distribution Line for Lead (Top 10 Languages)
- Alert – Your Homes Water Pipe is Made of Lead (Top 10 Languages)
- H.E.L.P. Loan Fact Sheet
- Basement Backup Protection Program Materials
- Plumbing Repairs Program Materials

3. Procedures

- i. To request document translations, email the Language Access Coordinator (LAC) at least 48 hours in advance:
 - Satteria.Kersey@phila.gov
 - Laura.Copeland@phila.gov

4. Website

- i. PWD's website contains the following information and materials in multiple languages:
 - Annual Water Quality Reports
 - Rate Increase Fact Sheets
 - Lead Program Fact Sheets and Materials
 - Intensive Cleaning/Rinse Lead from Service Pipe (Top 10 Languages)
 - Daily Cleaning Tips/Faucet Aerators (Top 10 Languages)
 - Check Distribution Line for Lead (Top 10 Languages)
 - Alert – Your Homes Water Pipe is Made of Lead (Top 10 Languages)
- ii. PWD will continue to translate additional select documents and make them available through the website, newsletter, and/or community engagement meetings and other events. PWD will periodically review our webpages with the goal of improving its accessibility to LEP persons. This includes identifying the most important information to be translated and the best means for disseminating translations to LEP communities.

- iii. Tag lines will be included on the website that explain that LEP individuals can obtain a translation of documents or that interpretation is available in our office.

5. Notification Letters

- i. PWD notifies customers of upcoming water/sewer/stormwater and green stormwater infrastructure construction projects several times prior to and during work. PWD has made a commitment to provide a translation of the content on the other side of the notification letter or on an additional page in a language that is dominant in the impacted neighborhood.
- ii. PWD plans to use the same criteria as outlined above for water/sewer emergency notification letters to customers.

6. Future Plans

- i. Language Access Goals: PWD's language access coordinator (LAC) will work with unit managers to continue to identify and edit for plain language important agency documents and education materials to have them translated into Spanish, the city's 2nd most predominant language. These documents will also be translated into other languages upon request.

C. Bilingual Staff

1. Current Staff

- i. The LAC will work with PWD managers and staff to identify bilingual staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.

2. Future Plans

- i. Hiring decisions are based on City departments' business needs as interpreted by department heads, including language service needs. Bi- or Multi-language needs will be addressed if they are bona fide occupational qualifications.
- ii. A "bona fide occupational qualification" is one that is essential to the effective performance of the job. When individuals are sought for positions in which they interact with LEP residents, language skills may be a "bona fide" or relevant job qualification.
- iii. Language skill needs may be addressed by:

- Create new positions for and hire full-time or part-time employees within departments using standard hiring processes.
- Reclassify and rewrite the job specifications for an existing position. If the need for interpretation and translation services is high and is expected to be long-term, PWD may redefine a position to include the required language skill(s) and request Human Resources to study the work and create the position.

D. Training Staff on Protocols and Procedures

1. Protocols

- i. PWD will have a current electronic copy of the Language Access Plan available on its intranet and hard copies will be made available upon request, so all staff will be knowledgeable of language access policies and procedures.
- ii. Language Access Coordinators reach out to all staff providing technical assistance, training or receiving in-bound calls to provide language training, or training upon employment as needed. Language Access training can also be obtained upon request.
- iii. Language access training will include information on the following topics:
 - Legal obligation to provide language assistance;
 - LAP plan and protocols;
 - Identifying and responding appropriately to LEP individuals;
 - Documenting LEP individuals' 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
 - Using or not using bilingual staff as in-house interpreters.
- iv. PWD will alert all staff to the availability of this language access policy and related protocols within 10 days after adoption.
- v. Every two years, PWD will alert all staff of any revised policy and protocols after adoption.

- vi. Within nine months of the adoption of this policy, PWD will provide cultural competency training, including training regarding this policy and the appropriate use of interpreters and translators, to all staff who have regular interaction with LEP individuals.
- vii. All new staff members who have regular interaction with LEP individuals, will receive cultural competency training within 6 months of the beginning of their employment. After their initial training, all staff members who have regular interaction with LEP individuals, can request refresher training in cultural competency and language as necessary.
- viii. To establish meaningful access to information and services for LEP individuals, staff that regularly interact with the public and those who will serve as in-house interpreters will be trained on PWD's language access policy, plan, and protocols. 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.
- ix. Orientation
 - New staff training will be provided on PWD's Language Access Plan and Protocols

2. Future Plans

- i. Further standardize language access resources and tools. PWD's LAC will work to ensure that all public-facing programs have appropriate language access signage and materials in multiple languages available.
- ii. Refresh PWD's Volunteer Language Database of staff who speak languages other than English.
- iii. PWD's LAC will update our Language Access Toolkit, an internal resource for staff and will meet with Department employees to share challenges and best practices.

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, including PWD Headquarters in Jefferson Center and PWD satellite offices. 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.

Tag lines 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 document translations or an interpreter to read or explain the document. PWD will contact the office of Immigrant Affairs for support in creating tag lines.

In all areas of public contact and on its website, PWD 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.

The Office of Immigrant Affairs has provided signage alerting PWD customers that interpretation services are available at customer contact locations.

In addition, PWD has integrated the City’s language layer in its GIS mapping system to identify the different languages spoken in the neighborhoods in Philadelphia to enable us to plan for community meetings and/or outreach materials.

ANNUAL REPORT AND EVALUATION

1. Annual Report

- i. The following information will be required to be monitored and collected by departments and will be collected via annual reports by the Office of Immigrant Affairs:
 - Number of Limited English Proficient (LEP) Encounters (By Language)
 - Type of Language Services Provided to LEP Customers
 - Number of Documents Translated
 - Language Services Expenditures
 - Number of bilingual staff
 - Number of staff trained in Language Access/Cultural Competency
- ii. The Office of Immigrant Affairs will supply all departments with a Language Access Data Collection sheet to assist in the reporting of this data.
- iii. The plan should include a method for developing performance measures appropriate to the department Language Access Plan and Policy and department operations.

2. Evaluation

- i. PWD 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:
 - 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 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.
 - Assessment of complaint information; and
 - Assessment of soliciting feedback from LEP individuals and community groups.

- ii. Evaluation of results and recommended changes will be shared by PWD's LAC and incorporated into an annual report which is required to be filed under Philadelphia Home Rule Charter § 8-600.
- iii. The LAC will also keep records of any language access services provided and will make this information available during the annual review process.
- iv. In connection with updates to the Language Access Plan, the Office of Immigrant Affairs 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.

LANGUAGE ACCESS COMPLAINT PROCESS

Customers may file a formal Language Access grievance with the Office of Immigrant Affairs if they believe they have been wrongly denied the benefits of this Language Access Plan. One must file their 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
City Hall, Room 162
Philadelphia, PA 19107
E-Mail: maria.giraldo-gallo@phila.gov

This form will also be available on the Office of Immigrant Affairs' website.

Additionally, any person, regardless of immigration status, may submit a formal legal complaint through the Philadelphia Commission on Human Relations.

To do so, a Public Accommodations Discrimination Intake Form must be completed and submitted 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.

TIMELINE FOR IMPLEMENTATION

Major milestones in PWD's Language Access Plan include:

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

1. Timeline through December 2022

- PWD will continue to utilize the services of United Language Group and GLOBO.
- PWD will continue to broadly translate materials and provide on-site interpretation as needed, and to track these activities.
- The LAC will continue to communicate with frontline staff to discuss language access and any emerging needs/challenges.
- The LAC will update internal protocols for written translations and in-person interpretations, respectively.
- The LAC will meet with front-line PWD staff to discuss language access challenges, best practices, and methods for tracking language access data by program/site, and brainstorm ideas for new or updated language access resources these staff might need.
- The LAC will update internal glossaries, as needed.
- PWD will work closely with the Office of Immigrant Affairs and will communicate with other City agencies about best practices, tools that can be shared and challenges.

2. Timeline Through December 2023

- The LAC will update the Language Access Toolkit and will distribute the updated toolkit to staff in the agency's public programs.
- The LAC will explore ways to track and certify PWD staff who speak other languages and who are willing to help review translations and provide interpretation services; this will include updating the agency's internal Volunteer Language Database.
- PWD will work to coordinate plain language and/or cultural competency trainings.

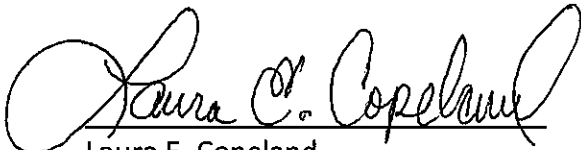
SIGNATURE PAGE



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3/15/22

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