

**LANGUAGE ACCESS PLAN PROCEDURES**

**Free Library of Philadelphia**

**January 2022**

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# **Free Library of Philadelphia**

## **LANGUAGE ACCESS PLAN PURPOSE AND AUTHORITY**

- A. *In Cooperation with the Mayor's Office, the **Free Library of Philadelphia** 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).*
- B. *The purpose of this document is to establish an effective plan and protocol for **The Free Library of Philadelphia** 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 literacy, guide learning, inspire curiosity, and promote diversity and inclusion.***

## **GENERAL POLICY**

- A.** *The Free Library of Philadelphia recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of **The Free Library** to ensure meaningful access to LEP individuals. The Free Library of Philadelphia adopts the following policy to ensure that LEP individuals can gain equal access to **The Free Library's** services and communicate effectively. This Plan applies to all Free Library departments and neighborhood libraries.*
- B.** *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 Free Library intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Free Library seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.*
- C.** *The Free Library bears the responsibility for providing appropriate services. Staff at the initial point of contact have the duty to identify language needs. The use of informal interpreters such as family, friends of the person seeking service, or other customers should 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*
- D.** *The preferred method of serving LEP persons is by:*
- (1) Using competent bilingual staff able to provide services directly to the customer in his/her/their primary language without the need for an interpreter.*
  - (2) Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.*
  - (3) Staff should seek assistance from professional telephonic interpreters.*

# **LANGUAGE ACCESS COORDINATOR**

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**215-686-8664**

## **DIRECT CONTACT WITH LEP INDIVIDUALS**

*The Free Library of Philadelphia has several points of contact with the public: LEP individuals visit neighborhood libraries, attend library programs, call the library and interact with library staff at community events throughout the city. In these instances, if there is no bilingual staff available to interpret, staff will use telephonic interpretation*

### **A) INTERPRETATION**

Interpretation is the immediate oral rendering of the source language into the target language.

#### **Services Provided**

- *To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our department will provide an interpreter, at no cost to the resident, for LEP individuals. Services offered include: available, trained, competent bilingual staff and in-person telephonic interpretation.*

#### **Protocols**

- *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 poster, the employee shall determine whether a bilingual staff member is available who speaks the language being requested. When bilingual staff is not available, the employee shall contact a telephone interpreter service(GLOBO) to provide interpreter services, the process to do so is outlined below:*
  - *Dial 267-318-XXXX*
  - *When prompted, enter the Location code for your library (the last 4 digits of your library's phone number) and follow the prompts.*
- *If GLOBO is not able to provide interpretation services for the language requested, call United Language Group at **800-535-XXXX** and follow the instructions given.*

## **B) FREE LIBRARY LOCATIONS**

Andorra Library	Independence Library	Queen Memorial Library
Blanche A. Nixon/ Cobbs Creek Library	Joseph E. Coleman Northwest Regional Library	Ramonita G. de Rodriguez Library
Bushrod Library	Katharine Drexel Library	Richmond Library
Bustleton Library	Kensington Library	The Rosenbach
Cecil B. Moore Library	Kingsessing Library	Roxborough Library
Charles L. Durham Library	Lawncrest Library	South Philadelphia Library
Charles Santore Library	Library of Accessible Media for Pennsylvanians (LAMP)	Tacony Library
Chestnut Hill Library	Lillian Marrero Library	Thomas F. Donatucci, Sr. Library
David Cohen Ogontz Library	Logan Library	Torresdale Library
Eastwick Library	Lovett Memorial Library	Wadsworth Library
Falls of Schuylkill Library	Lucien E. Blackwell West Philadelphia Regional Library	Walnut Street West
Fishtown Community Library	McPherson Square Library	Welsh Road Library
Fox Chase Library	Nicetown-Tioga Library	West Oak Lane Library
Frankford Library	Northeast Regional Library	Whitman Library
Fumo Family Library	Oak Lane Library	Widener Library
Greater Olney Library	Overbrook Park Library	Wynnefield Library
Haddington Library	Parkway Central Library	Wyoming Library
Haverford Library	Paschalville Library	
Holmesburg Library	Philadelphia City Institute	

## C) TRANSLATION

### 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.

### Protocols for Document Translation

The following vital written documents have been translated: Arabic, Simplified Chinese, French, Spanish, Russian, and Vietnamese.

- [Library Card Application](#)
- [Reconsideration of Library Materials](#)
- [Standards of Acceptable Behavior](#)
- [Holiday Closing Signs](#)
- [Unattended Children Signs](#)
- [We Speak Your Language poster](#)
- [Photo Release Forms](#)
- *Program flyers ([sample here](#))*

**Procedure for Submitting a document for translation:** Email your request to [southworthl@freelibrary.org](mailto:southworthl@freelibrary.org). If you are submitting a design request and would also like translation, please note that translations can add three to four weeks to the graphic design process and are subject to the availability of funds for this service.



## **D) STAFF TRAINING**

The Free Library's Language Access Plan & Protocol will be provided to all staff at the Free Library, posted on the intranet, and provided as a hard copy to all Free Library staff members at hiring so that all staff will be knowledgeable of Language Access Plan policies and procedures. In order to continue meaningful access to library information and services for LEP individuals, all public service staff will receive annual Language Access Plan training, or training upon employment, and then annually through the Free Library's Cluster Meetings.

Language Access Plan training will include information on the following topics:

- Legal obligation to provide language assistance;
- Language Access Plan and protocols;
- Identifying and responding appropriately to LEP individuals;
- Obtaining interpreters (over the phone);
- Using and working with interpreters (over the phone);
- Translating procedures;
- Using or not using multilingual staff as in-house interpreters and access to these staff members;
- Reporting data about Language Access.

New staff training will be provided on the Free Library's Language Access Plan to provide guidance on how to effectively communicate with LEP library users.

## **E) BI/MULTILINGUAL STAFF**

### **FREE LIBRARY STAFF - WORLD LANGUAGE SKILLS**

The list of identified staff that can deliver services directly in a language other than English or serve as interpreters for other employees can be found on Employee Intranet under Human Resources-- Staff Roster.

<b>World Language</b>	<b>Number of Staff</b>	<b>World Language</b>	<b>Number of Staff</b>
ASL (American Sign Language)	1	Italian	2
Arabic	1	Japanese	1
Bengali	1	Mandarin	4
Bosnian	1	Portuguese	1
Cantonese	2	Romanian	1
Croatian	1	Russian	3
French	5	Spanish	10
German	2	Serbian	1
Greek	1	Tamil	1
Hokkien	1	Ukrainian	1
Hungarian	1	Yiddish	2

### **NOTICE OF THE RIGHT TO LANGUAGE ACCESS**

Posters notifying LEP individuals of their right to language access are displayed in areas of public contact at all 54 library locations across Philadelphia in the seven languages most prevalent in the City.

## **LANGUAGE ACCESS COMPLAINT PROCEDURE**

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 email to:

Office of Immigrant Affairs  
Maria Giraldo-Gallo  
Language Access Program Manager  
1401 JFK Blvd., Suite 1430  
Philadelphia, PA 19102  
Email: [Maria.Giraldo-Gallo@phila.gov](mailto:Maria.Giraldo-Gallo@phila.gov)

[The form is available on OIA's 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 it in person or by email to:

Philadelphia Commission on Human Relations  
The Curtis Center  
601 Walnut Street, Suite 300  
Philadelphia, PA 19106

To access the form and for more information, please visit [www.phila.gov/humanrelations](http://www.phila.gov/humanrelations)

## **DATA COLLECTION AND ANNUAL REPORT**

*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:*

- a. Number of hours staff spend providing services in languages other than English.*
- b. Number of minutes of over-the-phone interpretation.*
- c. Number of Documents Translated*
- d. Language Services Expenditures*
- e. Number of bilingual staff*
- f. Number of staff trained in Language Access/Cultural Competency*

*When staff members provide interpretation, we will need to collect the following data: name (staff), library, language, and approximate hours per month spent providing services in this language. You may utilize the table below for tracking purposes.*

<i>LIBRARY</i>	<i>NAME (staff)</i>	<i>LANGUAGE</i>	<i>HOURS (per month)</i>

*When the library provides programs in languages other than English, we will need to collect the following data: library, name of program, language provided, program description*

<i>LIBRARY</i>	<i>NAME OF PROGRAM</i>	<i>LANGUAGE</i>	<i>PROGRAM DESCRIPTION</i>

*The Free Library 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.*

**SIGNATURE PAGE**



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Language Access Coordinator



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President and Director