

2022

OFFICE OF HOMELESS SERVICES
LANGUAGE ACCESS PLAN and PROTOCOL

1. PURPOSE AND AUTHORITY

The City of Philadelphia's Office of Homeless Services (OHS) is committed to ensuring that individuals with Limited English Proficiency ("LEP") have meaningful access to homeless assistance services and programs. OHS 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.

The purpose of this document is to establish an effective plan and protocol for OHS personnel to follow when providing services to, and interacting with, individuals who have limited English proficiency (LEP), and to ensure individuals have complete information about services available to them. Following this plan and protocol is essential to the success of our mission to provide the leadership, coordination, planning and mobilization of resources to make homelessness rare, brief, and non-recurring in the City of Philadelphia.

2. GENERAL POLICY

OHS recognizes that people with Limited English Proficient (LEP) may experience literal or imminent homelessness and turn to the homeless assistance system for help. To ensure all people needing homeless services have access to the system, OHS has implemented an equal access rule to ensure everyone, including people with LEP, have the information they need in the language they speak to access homeless services. The inability to speak English proficiently should not be a barrier to getting housing assistance.

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. OHS is fully committed to taking reasonable steps to provide people with LEP meaningful access to homeless services and programs. OHS seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

To that end, OHS is responsible for providing language appropriate services, identifying and recording language needs at the initial point of contact. OHS is prohibited from the using informal interpreters such as family, friends of the person seeking services, or other participants, engaging minor children as interpreters, suggesting or requiring that person with LEP provide an interpreter in order to receive services.

OHS will document the preferred method of serving LEP participants by:

- Utilizing competent bilingual staff to provide services directly to the participant in their primary language without the need for an interpreter;
- Making available, trained, competent bilingual staff for in-person assistance or telephone interpreting to support other staff to the greatest extent possible.

OHS will seek assistance from professional in-person or telephonic interpreters when staff cannot meet the participant's language needs. Certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available (for example, situations concerning HIPAA, confidentiality or anything that may have a legal implication). Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the LEP person.

3. LANGUAGE ACCESS COMMITTEE

OHS Language Access Coordinator
Rakeisha Stevenson, Social Work Supervisor
City of Philadelphia Office of Homeless Services
Appletree Family Center, 1430 Cherry Street
215-686-6742
Rakeisha.Stevenson@phila.gov

4. DIRECT CONTACT WITH LEP INDIVIDUALS

OHS has several points of contact with the public:

1. Administrative Offices — MSB 1401 JFK Boulevard, 10th floor: Point-to-Language identification poster and cards are in place at the front desk to assist staff and LEP participants in identifying their primary language.
2. Appletree Family Center — 1430 Cherry Street — Access Point: Bilingual staff members who provide in-person interpretation. Three dual handsets are used for telephonic interpretation. Point-to-Language identification poster.
3. Roosevelt Darby Center — 804 N. Broad Street — Access Point: Bilingual staff members who provide in-person interpretation. One dual handset for telephonic interpretation; Point-to-Language identification poster.
4. The Salvation Army Red Shield Family Residence — 715 N. Broad Street — After-hours Access Point for families (Head of household + child/ren): Point-to-Language identification poster.

5. House of Passage — 111 N. 49th Street — After-hours Access Point for single women: Point-to-Language identification poster.
6. Station House — 2601 N. Broad Street — After-hours Access Point for single men: Bilingual staff members who provide in-person interpretation and Point-to-Language identification poster.

5. LANGUAGE ACCESS SERVICES AND PROTOCOLS

A. INTERPRETATION

To ensure the inability to communicate in English does not deprive the public of rights and privileges, OHS will provide an interpreter, at no cost to the participant, for LEP participants. Services offered include telephonic interpretation and in person interpretation.

Interpretation services take place on the day the participant arrives at the access point. OHS staff will arrange for interpretation services with an in-person or telephone interpreter. The OHS staff member will help the participant utilize the posters or brochures to determine what language they speak and ensure that an in-person or telephonic interpreter is used to assist the participant.

Each access point have and use posters and brochures from Language Line Services, which are designed to assist LEP participants. A point-to poster is available at the sites which list 20 different languages and states that participants have a right to interpretation services at no cost to them.

Notices have been translated into Spanish. Spanish is the language used by most LEP participants that are served by OHS. The participant will complete documents in his/her language.

Protocols

An interpreter will be provided for LEP persons pursuant to the following:

- A participant approaches an OHS 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 OHS employee shall determine the availability of a bi-lingual staff member who speaks the language being requested.

When bilingual staff is not available, the OHS staff member shall contact a telephone interpreter service to provide interpreter services. The process to contact the telephone interpreter service is outlined below.

Telephonic Interpretation Instructions for OHS Staff

OHS can get an over-the-phone interpreter by calling Language Line. This service is available 24/7:

GLOBO: 267-318-4434, PIN# 1000

United Language Group (ULG): 800-577-3290

In cases when there is a problem accessing the language line, staff is directed to contact the OHS Language Access Coordinator for guidance.

In-Person Interpretation

An in-person interpreter can be requested by contacting Nationalities Service Center. This service is available 24/7 but requires more than 48 hours' notice whenever possible. In an emergency, a telephonic interpreter should be used.

To submit a request online, visit www.nscphila.org/language-access-services/request-services

- Fill out service request form and be sure to select interpretation
- Enter any interpretation appointment information available
- You will receive an email once an interpreter has been confirmed

Cancellation of In-Person Interpreter

If a request for an in-person interpreter will not be needed, call Nationalities Service Center to cancel the request at least a full business day in advance of the scheduled time (if possible).

Future Plans for Improving Interpretation Services and Protocols

OHS is identifying staff who can serve as in-person translators. OHS will ensure that the public knows the availability of these services through its website, social media, visible multilingual signs, and the OHS Language Coordinator will train Appletree Family Center and Roosevelt Darby Center staff on how to request in-person and telephonic interpretation services.

B. TRANSLATION

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

OHS Documentation Language Conversion Request

Procedure for submitting documents for translation

1. Email the document(s), in Word, PDF, or PPT format to Phila@powerling.com requesting to have documents translated

2. Complete the below Language Conversion Request format and include it in the body of email sent to Phila@powerling.com

Project Name	
Source Language	
Target Language(s)	
Deliverable Format (Word, PDF, PPT ...)	
Requested Due Date	
Services (Translation, Proofreading, Express...)	
Need for special formatting -DTP?	
Requestor (Program Code + Team Member Name)	24 – OHS
Invoice Program Code (if different from Requestor)	
Deliver Translation to:	Rakeisha.Stevenson@phila.gov ; Maria.Giraldo-Gallo@phila.gov ; (Your email address)
Comments:	

NOTE: Before submitting a document for translation, please review it and ensure the following:

- The content has not already been translated in another document
- The document and translation procedure has been approved by your supervisor
- The document is in a format that can be edited (e.g., Microsoft Word, PDF, or PowerPoint)
- The document is written so it can be understood by readers with lower literacy skills.

C. BILINGUAL STAFF

Hiring

To the extent possible, OHS will ensure that each of our intake sites have staff with bilingual or multilingual skills. OHS is working with the Office of Immigrant Affairs and Human Relations to recruit bilingual staff.

Staff Interpreters

Bilingual staff can also function as interpreters for other staff.

Language Sensitive Assignments

OHS will consider the options available to assign or configure employees in order to best communicate with LEP individuals served by or in contact with the department without imposing unfair burdens on bilingual staff.

D. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS

Training Protocol

- OHS Language Access Plan & Protocol is provided as a hard copy of all OHS staff members by the OHS Training Unit
- OHS will distribute the Language Access Plan & Protocol to all staff and provide a electronic copy so all staff will be knowledgeable of Language Access Plan & Protocol policies and procedures
- All staff who provide direct assistance and/or receive telephone calls will receive annual Language Access Plan & Protocol training, or training upon employment and then annually
- Policy, Planning, and Performance Unit (P3) will conduct department wide training in July 2022.

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

- Legal obligation to provide language assistance
 - Language Access Plan & Protocol 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
 - Using or not using bilingual staff as in-house interpreters
- OHS will circulate the language access policy and related protocols to all staff within 10 days after the plan is adopted. Every two years, OHS will circulate the revised policy and protocols to all staff. Within nine months of the adoption of this policy, OHS will provide cultural competency training, including training in regard to this policy and the appropriate use of interpreters and translators, to all staff who have regular interaction with LEP individuals. All new staff members will receive cultural competency training within six months of the beginning of their employment. After their initial training, all staff members will receive refresher training in cultural competency and language access every three 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 in-house interpreters will be trained on OHS Language Access Plan & Protocol. Training will ensure staff members are able to work effectively in person and/or by telephone with LEP individuals. Management staff will be included in his training, even if they do not interact regularly with LEP individuals, to ensure that they fully understand the Language Access Plan & Protocol so they can reinforce their importance and ensure implementation.

- Orientation — Training will be provided for new staff on the OHS Language Access Plan and Protocol; OHS will provide guidance on how to effectively communicate with LEP participants.

Future Plans for Training

OHS will expand training opportunities in collaboration with OIA on effective communication with LEP participants, cultural competency topics, and use of telephonic interpretation.

E. ADMINISTRATIVE HEARINGS

This section does not apply to the Office of Homeless Services 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 translated in 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.

7. DATA COLLECTION AND ANNUAL REPORT

OHS Access Point staff will record each person's language of choice in electronic format to ensure that the information can be used by staff and tracked by the Language Access Coordinator.

- If the individual is LEP, the person's language of choice will be noted for future services.
- OHS's Language Access Coordinator will track the number of individuals that are assisted or unable to be assisted in the participant's language of choice. This information will be considered as part of the annual Language Access Plan report.

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

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 Participants
3. Number of Documents Translated
4. Language Services Expenditures

Additionally, the OHS Language Access Coordinators is required to report quarterly on the following:

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

OHS 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. Designated staff will lead the evaluation with the assistance of the Director. The evaluation will include the following:

1. Assessment of the use of telephonic interpretation, in-person interpretation and translation services.
2. Assessment of data collected about the LEP's primary language.
3. Assessment of the number and types of language requests during the past year.
4. 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.
5. Assessment of complaint information.
6. Assessment of soliciting feedback from LEP individuals and community groups.

Evaluation results and recommended changes will be shared by the Language Access Coordinator 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.

8. LANGUAGE ACCESS COMPLAINT PROCEDURE

OHS has an established 24/7 Participant Response Line (215-686-4700) for persons housed in emergency housing who would like to file a complaint anonymously. The outgoing message is in English and Spanish; bilingual staff members review and respond to complaints.

An LEP participant may file a formal Language Access grievance with OIA if the individual believes that he or she was wrongly denied the benefits of this Language Access Plan. The participant must file the complaint within six (6) months of the alleged denial. To file a formal complaint, the participant must complete a Language Access Grievance Form (<https://www.phila.gov/programs/language-access-philly/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
Municipal Services Building
1401 JFK Blvd., 14th Floor, Suite 1430
Philadelphia, PA 19102

T (215) 686-0876, C (215) 941-2214
Email : 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. TIMELINE FOR IMPLEMENTATION


Major milestones in OHS Language Access plan include the following:

- Establish and enforce language access requirements with OHS contractors and their subcontractors
- Update agency language access tools and resources
- Explore additional training opportunities

Ongoing

- Communicate with front desk and intake staff about language access obligations and resources as well as identifying and reporting emerging needs or challenges
- Coordinate translation of materials and on-site interpretation, and track these activities
- Update OHS website
- Monitor, evaluate, and update OHS language access policies, procedures, and plan


10. SIGNATURE PAGE



OHS Language Access Coordinator
Office of Homeless Services



Date



Director
Office of Homeless Services

March 16, 2022

Date