

# Language Access Plan

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## *PURPOSE AND AUTHORITY*

In Cooperation with the Mayor's Office, the Office of Children and Families (OCF) 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 OCF staff to follow when providing services to or interacting with individuals who are LEP.

## *GENERAL POLICY*

OCF recognizes that the population eligible for services includes individuals who are LEP. It is the policy of OCF to ensure meaningful access to LEP individuals. OCF aligns with 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. OCF fully adopts this policy and seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

From the initial point of contact with our office, to the materials we distribute, OCF is responsible for providing language appropriate services.

## **LANGUAGE ACCESS COORDINATOR:**

Priscilla Suero, Director of Administration  
Office of Children and Families  
One Parkway Building, 1515 Arch Street, 3<sup>rd</sup> floor  
Philadelphia, PA 19102  
Phone: 215-686-0351  
Email: [priscilla.suero@phila.gov](mailto:priscilla.suero@phila.gov)

## *Service Area:*

OCF serves all of Philadelphia. Our primary operating programs are Community Schools, PHLprek, Out of School Time Services and Workready.

For Community Schools, OCF primarily serves the school and its surrounding community. As of February 1, 2022, Community Schools are:

- William Cramp Elementary School
- Murrell Dobbins CTE High School
- F.S. Edmonds Elementary School
- Edward Gideon Elementary School
- Kensington Health Sciences Academy

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- Logan Elementary School
- Southwark Elementary School
- South Philadelphia High School
- Tilden Middle School
- George Washington High School
- Alain Locke Elementary School
- Samuel Gompers School
- Hamilton Disston School
- Overbrook Educational Center
- John H. Webster School
- James Logan Elementary
- Richard R. Wright School

## Overview

OCF provides the following guidance for staff serving LEP individuals.

### *In-person Services*

When no bilingual staff are available to interpret, staff must use telephonic interpretation. In addition:

- The use of informal interpreters such as family, friends of the person seeking services, 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 to receive services.

### *Meetings/Information Sessions*

If language needs are anticipated, OCF will arrange with the Office of Immigrant (OIA) to utilize in person interpretation for the appropriate languages spoken.

### *Community Engagement and Public Outreach*

In these cases, OCF will arrange with OIA to use in-person interpretation for the appropriate languages spoken.

### *Constituent Concerns Via Phone*

For phone interpretation, first use staff members that speak the desired language. If no staff are available, phone interpretation is used. Please refer to sections above for additional guidance.

## Interpretation

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To ensure that LEP 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 individuals.

Services offered include telephonic interpretation and in person interpretation:

### **Telephonic Interpretation Services**

When to use telephonic interpretation services:

- An individual approaches an employee and appears to be asking for help but has difficulty communicating what they need, 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.

### **In-person interpretation services**

An in-person interpretation service should be used when an OCF staff member is holding an event that will include LEP individuals that do not speak English as a second language. For events held at schools, OCF will work in partnership with the School District of Philadelphia to identify interpreters.

## Translation Services

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Our department will continue to translate key materials, at no cost to the resident for LEP individuals. The service is provided through a provider contract to deliver timely and accurate translations in the appropriate language.

## Staff Training

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OCF will circulate this language access policy and protocols to all staff after adoption; and thereafter every two years and upon new staff hire.

OCF staff will have regular training on our Language Access Services and Protocol. All staff providing technical assistance, training, or receiving inbound calls will receive annual LEP training, or training upon employment, and then annually.

LEP training will include information on the following topics:

- Legal obligation to provide language assistance.
- LEP plan and protocols.

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- 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.
- Use of bilingual staff as in-house interpreters.

Within 12 months of the adoption of this policy, all staff who have regular interaction with LEP individuals will be trained on cultural competency, including this and the appropriate use of interpreters and translators. All new staff members will receive cultural competency training within six months of the beginning of their employment with OCF. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.

Staff that regularly interact with the public and those who will serve as in-house interpreters will be trained on OCF's 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 on the OCF Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

## 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. The information will be in English as well as the primary 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.
- All staff will have access to the City of Philadelphia Language Access Cards.
- In all areas of public contact and on its website, OCF 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.

## 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.

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

OCF will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness, and identify new strategies for serving LEP residents. The designated staff will lead the evaluation with the assistance of the Deputy Mayor.

Evaluation results and recommended changes will be shared by the OCF 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.

## LANGUAGE ACCESS COMPLAINT PROCEDURE

If a person has a formal Language Access grievance with and believes they has been wrongly denied the benefits of this Language Access Plan, a complaint must be filed within six months of the alleged denial. To file a formal complaint, please contact in person, by mail or e-mail:

Maria Giraldo Gallo, PMP  
Office of Immigrant Affairs (OIA)  
Language Access Program Manager  
1401 John F. Kennedy Blvd, Suite 1430 Philadelphia, PA 19102  
(215) 686-0876  
E-Mail: [maria.giraldo-gallo@phila.gov](mailto: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](http://www.phila.gov/humanrelations)

## SIGNATURES

A handwritten signature in black ink, appearing to read "Priscilla Suero".

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Priscilla Suero  
Language Access Coordinator, Office of Children and Families

A handwritten signature in black ink, appearing to read "Vanessa Garrett-Harley".

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Vanessa Garrett-Harley  
Deputy Mayor, City of Philadelphia Office of Children and Families

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