

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

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## **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**

Laura E. Copeland

Assistant Deputy Commissioner, Education, Community Engagement and Government Affairs

Philadelphia Water Department

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Philadelphia, PA 19107

Office: 215-685-4902

Cell: 215-300-9208

Laura.Copeland@phila.gov

### **Language Access Coordinator (Alternate)**

Satteria Kersey

Public Relations Specialist II

Philadelphia Water Department

1101 Market Street, 6th Floor

Philadelphia, PA 19107

Satteria.Kersey@phila.gov

### **Commissioner**

Randy E. Hayman, Esq.

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:  
[Satteria.Kersey@phila.gov](mailto:Satteria.Kersey@phila.gov)  
[Laura.Copeland@phila.gov](mailto: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:
  - [Satterria.Kersey@phila.gov](mailto:Satterria.Kersey@phila.gov)
  - [Laura.Copeland@phila.gov](mailto: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 2<sup>nd</sup> 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](http://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.

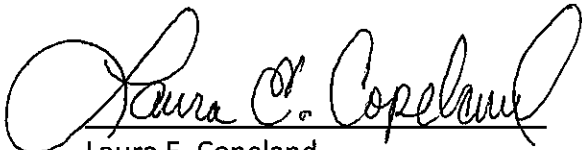
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Randy E. Hayman, Esq.  
Commissioner  
**Philadelphia Water Department**

03/15/2022

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Date



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Laura E. Copeland  
Language Access Coordinator  
Assistant Deputy Commissioner, Education,  
Community Engagement and Government Affairs  
**Philadelphia Water Department**

3/15/22

\_\_\_\_\_  
Date

# **DEPARTMENT OF REVENUE LANGUAGE ACCESS PLAN & PROTOCOL**

## **1. PURPOSE AND AUTHORITY**

In Cooperation with the Mayor's Office, the Department of Revenue 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 Department of Revenue 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 collect a variety of tax and non-tax revenue due to the City and tax revenue due to the School District of Philadelphia promptly and efficiently by increasing on time payments and decreasing delinquency.

## **2. GENERAL POLICY**

The Department of Revenue recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the Department of Revenue to ensure meaningful access to LEP individuals. The Department of Revenue adopts the following policy to ensure that LEP individuals can gain equal access to Department of Revenue's services and communicate effectively. This Plan applies to all Department of Revenue 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. The Department of Revenue intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Department of Revenue seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

### **A. Responsibility Statements:**

The department, rather than the LEP customer, bears these 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 services, 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 in order to receive services.

**B. Preferred Method of Service:**

1. Using competent bilingual staff able to provide services directly to the customer in his/her 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 in-person or telephonic interpreters when staff cannot meet language needs.
4. Departments should recognize that 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**

***Language Access Coordinator***

Joseph Bamat

Communications & Outreach Manager

City of Philadelphia Department of Revenue

Municipal Services Building, Room 630

Direct: (215) 686-4255

Joseph.Bamat@phila.gov

***Language Access Committee***

Michele Hannah (Tax Revenue Bureau) - (215) 686-2058

Brian Mera (Law Revenue Bureau) - (215) 686-0585

Lawrence Taylor (Water Revenue Bureau) - (215) 686-6838

### **4. DIRECT CONTACT WITH LEP INDIVIDUALS**

The Department of Revenue has several points of contact with the public:

- A. Office - Customers come to the Department of Revenue on a daily basis seeking assistance for various services; including, assistance programs, current and delinquent payments and payment agreements. In these instances, if there are no bilingual staff available to interpret, staff uses telephonic interpretations. Various locations include:

**Municipal Services Building**  
 1401 John F. Kennedy Boulevard  
 Concourse Level

*Office Hours: Monday-Friday (8:30 a.m. - 5:00 p.m.)*

**North Philadelphia - Tax & Water Revenue**  
 Hope Plaza

22nd & Somerset St.

*Office Hours: Monday-Friday (8:30 a.m. - 5:00 p.m.)*

**Northeast Philadelphia - Tax & Water Revenue**  
 7522 Castor Ave.

*Office Hours: Monday-Friday (8:30 a.m. - 5:00 p.m.)*

- B. Field - Revenue Investigators and Revenue Examiners work in the field.** Investigators conduct field enforcement work investigating tax and water sewer delinquents for collection of revenue. Revenue Examiners conduct field audits of the accounting and other financial records of businesses and individuals to determine tax liability. The department will work with the Office of Human Resources and Chief Administrative Office to recruit, test, and hire bilingual field employees.
- C. Call Center - residents of Philadelphia call our call center during business hours to pay their bills or for questions regarding notices that they have received in the mail.**

## **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, our department will continue to provide an interpreter, at no cost to the resident, for LEP persons pursuant to the following procedures:

#### **2) Protocols**

- 1) 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.
- 2) When bilingual staff is not available, the employee shall contact a telephone interpreter service to provide interpreter services.

### Telephonic Interpretation

The Department of Revenue can get an over-the-phone interpreter by calling the following vendor: Globo. This service is available 24/7. To access an interpreter:

- Dial 267-318-4433
- Provide the Client ID
- Indicate the language needed

### **3) Future Plans**

#### Language Access Goals:

**Use telephonic interpretation, and ensure that the public knows about the availability of these services.** The Department of Revenue will consult with the Office of Immigrant Affairs, which makes telephonic interpretation services available in its main office through Language Services Associates. The telephonic interpretation service is available in over 170 languages. The Department will continue to inform the public about these resources through social media, visible multilingual signs and will train its entire staff on using telephonic interpretation services. The Language Access Coordinator will work closely with the Office of Immigrant Affairs to identify resources that will be beneficial for LEP individuals.

**In-person interpretation services.** The Department of Revenue can offer in-person interpretation for scheduled appointments and meetings as needed through Nationalities Service Center if given enough notice. The Department of Revenue will continue to inform the public about these resources through social media, visible multilingual signs and will train its entire staff on requesting in-person interpretation services.

## **B. TRANSLATION**

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.

### **1) Vital documents**

- a. Information on most assistance, payment plans and discounts are available in Spanish and Simplified Chinese online and in print. Example includes water bills, tax and other revenue collections documents.
- b. Flyers:
  - Active Duty Tax Credit (Spanish, Chinese)
  - Real Estate Tax Deferral Program (Spanish, Chinese)
  - Real Estate Installment Program (Spanish, Chinese)
  - Owner-Occupied Payment Agreement Program (Spanish, Chinese)

- Senior Citizen Tax Freeze Program (Spanish, Chinese)
    - Senior Citizen Discount (Spanish, Chinese)
    - Homestead Exemption (Spanish, Chinese, French)
    - Taxpayer Resources and Programs (Arabic, French, Haitian Creole, Italian, Portuguese, Russian, Simplified Chinese, Spanish, Vietnamese)
  - c. Applications:
    - Homestead (Spanish, Chinese, French)
    - OOPA (Spanish, Chinese, French)
    - Senior Citizen Tax Freeze Program (Spanish, Chinese, French)
    - Installment Program (Spanish, Chinese, French)
    - Water bill assistance (Spanish)
  - d. Homestead, LOOP and EITC programs- Information is available in multiple languages online.
- 2) Procedure for Submitting a document for translation:
- a. Email the editable document to the Language Access Coordinator- Joseph Bamat at [Joseph.Bamat@phila.gov](mailto:Joseph.Bamat@phila.gov).
  - b. The Language Access Coordinator will submit the document as needed to the translation vendor and copy the Office of Immigrant Affairs (OIA) – Language Access Program Manager for review. When appropriate, the Coordinator will provide the department’s own Real Estate Tax and Water glossaries in Spanish and Chinese to the vendor, to ensure translations that are consistent with existing materials and documents.
  - c. The translation vendor will email a quote.
  - d. Person with authority must authorize quote.
  - f. Quote is then signed and emailed back to vendor.
  - g. Vendor will email you the translated documents.

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

- a. The content has not already been translated in another document.
- b. Your supervisor has approved the document and translation procedure.
- c. The document is in a format that can be edited (e.g. MS Word, Publisher, InDesign, etc.)
- d. Terms you do not want translated are highlighted, i.e. the name of your unit, program or street.
- e. The document is written so readers with lower literacy skills can understand it.
- f. If the translation is a continuation of a series or collection of documents, you may request the same vendor to keep the translation consistent.

## 3) Signage

- a. The Revenue Department will translate and display current signage of the services offered by the department to better inform LEP customers of the services available to them.

## 4) Website

- a. The Department of Revenue will take proper measures to ensure that the department's website provides important documents and resources necessary for LEP individuals who need assistance with the department's services.
- b. The Department of Revenue will take the following steps:
  - I. The Department shall take reasonable steps to translate public website content and electronic documents that contain vital information about agency programs and services.
  - II. The Department will be wary of Google translate and not use it as a permanent solution to translation.
  - III. The Department will identify areas on the website where taglines are appropriate.

## 5) Future Plans

- a. Write public materials in plain English and translate extensively. The Department of Revenue has allocated funding for language services, which will be used on translations of public materials and vital documents. The Department of Revenue will implement a process involving community feedback to determine which languages are in higher demand to best accommodate the LEP community.

## C. BILINGUAL STAFF

## 1) Current Staff

- a. This list identifies the languages spoken by the Department of Revenue staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to service as interpreters if available.

Spanish	French	Hindi	Malayalam	Gujarati
Russian	Yoruba	Marathi	Vietnamese	Creole
Dutch	Italian	Portuguese	Greek	Arabic
Afrikaans	Baoule'	Yiddish	Tamil	Medumba
Finnish				

## 2) Future Plans

- a. Hiring - Hiring decisions are based on City departments' business needs as interpreted by department heads, including language service needs. Language service needs will be addressed by including language skills as a "desirable" qualification in job announcements. The Department of Revenue will work with Office of Human Resources and Chief Administrative Officer to recruit, test, and hire bilingual employees.



## D. TRAINING STAFF ON POLICY, PLAN AND PROTOCOLS

### 1) Training Protocol

- a. The Department of Revenue Language Access policies will be part of the staff handbook, posted on the intranet, and provided as a hard copy to all Revenue staff members at hiring.
- b. The Department of Revenue will distribute the Language Access Plan to all staff and will have a current electronic copy available so that all staff will be knowledgeable of language access policies and procedures.
- c. All staff providing technical assistance, training, or receiving in-bound calls will receive annual LEP training, or training upon employment and then annually.
- d. Language Access training will include information on the following topics:
  - Legal obligation to provide language assistance;
  - LEP 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
- e. The Department of Revenue will circulate this language access policy and related protocols to all staff within 45 days after adoption. Every two years, the department of Revenue will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, the Department of Revenue will work towards providing 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 one year of the beginning of employment with the Department of Revenue. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.
- f. In order to establish a 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 the Department of Revenue's LEP policy, plan, 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.
- g. Orientation- New staff will be provided the Department of Revenue Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

## 2) Future Plans

- a. The Department of Revenue will work with the Office of Immigrant Affairs to provide bilingual employees with formal interpretation training and expand training opportunities on plain-language and cultural competency topics. The department will develop a training throughout the year.

## E. ADMINISTRATIVE HEARINGS

Currently, the Department of Revenue holds informal water rate hearings and commercial activity license hearings. At this time, the department has not identified other administrative hearings.

### 1) Protocol

- a. The Revenue Department will provide a trained legal interpreter for any hearing that an LEP individual requests language assistance with at least three business days' notice.
- b. Once a request for an interpreter has been made, a formal request for an in-person interpreter will be sent to a vendor. If an in-person interpreter is not available, a telephonic interpreter will be provided.

### 2) Future Plans

- a. An effort will be made to provide simultaneous interpretation over consecutive interpretation.
- b. A protocol will be put in place that will identify whether a resident is LEP prior to the hearing in order to plan accordingly for an interpreter.

## 6. NOTICE OF THE RIGHT TO LANGUAGE ACCESS

1. 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 the principle languages spoken in the service area.
2. Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.
3. 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 individuals with LEP can obtain translation of the document or an interpreter to read or explain the document. Contact the office of Immigrant Affairs for support in creating tag lines.

4. In all areas of public contact and on its website, Department of Revenue 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.

## **7. 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 quarterly reports by the Department of Revenue:

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

The Department of Revenue will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness, review the progress of stated goals and identify new goals or strategies for serving LEP residents. The Language Access Committee will lead the evaluation with the assistance of the Language Access Coordinator and the Office of Immigrant Affairs. 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.
- 1) The Department of Revenue intake personnel will record each person's language of choice in electronic format to ensure that staff can use the information and the language access coordinator can track the data.
    - a. If the individual is Limited English Proficient, the person's language of choice will be noted for future visits.
    - b. The Language Access Coordinator will track the number of individuals that are assisted or unable to be assisted by the person's language of choice. This information will be considered as part of the annual Language Access Plan report.

- 2) Evaluation results and recommended changes will be shared by the Language Access Coordinators 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. In connection with updates to the Language Access Plan, the Department of Revenue may use some of the following tools to conduct further assessment:
- a. Request comments and feedback from visitors that have received language services
  - b. Establish a tracking system to collect primary-language data for individuals that participate in programs and activities

## **8. 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 e-mail to:

Office of Immigrant Affairs  
 Language Access Program Manager  
 1401 JFK Blvd., Suite 1430  
 Philadelphia, PA 19107  
 E-Mail: [oia@phila.gov](mailto:oia@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/humamelations](http://www.phila.gov/humamelations)

## **9. TIMELINE FOR IMPLEMENTATION**

Implementation Plan Logistics

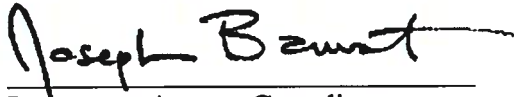
Major milestones in our plan will include:

- Updating agency language access tools and resources
- Exploring additional training opportunities

**Timeline:****FY2021- FY2022**

Review any Language Access comments or complaints and determine possible changes  
Review Language Access Report and assess data and use to make further changes to the  
Language Access Plan  
Agency will adjust and update this plan as needed

## 10. SIGNATURE PAGE



Language Access Coordinator  
Joseph Bamat  
Department of Revenue

03/17/2021

Date



Commissioner  
Frank Breslin  
Department of Revenue

4/7/21

Date