

# PHILADELPHIA FIRE DEPARTMENT LANGUAGE ACCESS PLAN

## 1. PURPOSE AND AUTHORITY

In cooperation with the Mayor's Office, the Philadelphia Fire Department (PFD) a.k.a. the Department, 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.

The purpose of this document is to establish an effective plan and protocol for PFD personnel to follow when providing services to, or interacting with Limited English Proficient (LEP) persons. Following this plan and protocol is essential to the success of our mission to serve the public by providing comprehensive all hazard prevention, risk reduction and emergency response and to ensure the health and safety of our members.

## 2. GENERAL POLICY

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

### **PFD, rather than the LEP customer, bears the following responsibilities:**

1. To provide language appropriate services, when requested or determined needed or appropriate.
2. To discourage the use of informal interpreters such as family, friends of the person seeking services, or other customers in non-emergency situations.
3. To prohibit minor children from acting as interpreters except in emergency situations.
4. To prohibit staff from suggesting or requiring LEP customers provide an interpreter to receive services.

**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 primary language without the need for an interpreter.
2. Seeking assistance from professional in-person or telephonic interpreters when staff cannot meet language needs.
3. Recognizing that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available (*staff are authorized to offer and provide language services to communicate effectively even when such assistance is not requested by the LEP person*).

### 3. LANGUAGE ACCESS COORDINATOR

**Language Access Coordinator**

Dana Jackson

Professional Standards Officer & Director of Diversity, Equity & Inclusion

Philadelphia Fire Department

240 Spring Garden Street

Fire Administration Building 2nd Floor

Dana.Jackson@phila.gov

**Fire Commissioner**

Adam K. Thiel

### 4. DIRECT CONTACT WITH LEP INDIVIDUALS

**The Philadelphia Fire Department has several points of contact with the public:**

1. **Fire Station "walk-ins":** LEP individuals may come into PFD stations looking for help in obtaining services. In these instances, if there is no bilingual staff available to interpret, PFD members will utilize telephonic interpretation, per PFD Directive #65.
2. **Meetings / Information Sessions:** At times PFD will hold meetings or information sessions. When language needs are anticipated or requested, PFD will utilize in-person interpretation.
3. **Emergency Response:** PFD employees sometimes come into contact with LEP individuals when responding to an emergency call. In situations where there is no bilingual staff is available, and if time or situation allows, PFD members will utilize telephonic interpretation, per PFD Directive #65.

### 5. LANGUAGE ACCESS SERVICES AND PROTOCOLS

#### A. INTERPRETATION

Members who encounter a language barrier during the course of their duties are to utilize the provided "Language Line" translation service for communication support.

The Fire Communication Center (FCC) will assist members who encounter a language barrier during the course of their duties and will facilitate a conference call with an appropriate translator.

#### Procedure for Telephone Interpretation Service

When, in the course of their duty, a member encounters a language barrier, that member will, when safe, contact the FCC via telephone and request language support. Members should attempt to identify the language in question through the use of the Language Identification Guide provided to all companies prior to calling the FCC.

Requests for translations service through the Language Line may only be initiated by the FCC. Members are not permitted to contact the Language Line directly.

Upon receiving the call, the FCC will initiate the call to the Language Line and provide the service with the account number, password, and the language translation requested. The PFD member will then be conferenced to a translator. If the language presented needs to be identified, the service can assist with identification.

#### In-Person Interpretation

Members can request an in-person interpreter if they anticipate language needs when serving the community. Members will contact the Fire Department Language Access Coordinator at least seven days prior to the event with all of the information for the meeting or event, including date, time, location, nature of the meeting/event, language needed.

## **B. DOCUMENT TRANSLATION**

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, the PFD will continue to provide translations, at no cost, for LEP individuals. This includes translations of vital documents, signage and portions of the PFD website.

#### **Departmental procedure for submitting a document for translation:**

1. Member will email the editable documents to the Fire Department Language Access Coordinator at least 60 days before the translated document is needed.
2. The Language Access Coordinator will submit the translation request to the Mayor's Office of Immigrant Affairs (OIA).
3. OIA will submit translation to vendor to obtain a quote.
4. OIA will email the Language Access Coordinator with a quote for approval and an estimated completion time.
5. Quote must be approved by the Fire Department Language Access Coordinator.
6. Approval is emailed to the Office of Immigrant Affairs.
7. OIA will email the Fire Department Language Access Coordinator the translated documents when completed.

**NOTE: Before submitting a document for translation, members will review documents and ensure the following:**

- The content or document has not already been translated under a prior effort.
- The document and translation procedure have been approved by the appropriate chain of command.
- The document is in a format that can be edited (e.g. MS Word, Publisher, InDesign, etc.).
- Terms that should not be translated are highlighted, e.g. the name of your unit, program or street. The document is written so it can be understood by readers with lower literacy skills, if possible.
- If the translation is a continuation of a series or collection of documents, staff may request the same vendor to keep the translation consistent.

### C. BILINGUAL STAFF

The PFD currently has 53 self-identified bilingual employees who speak a language other than English. Those languages include Albanian, Greek, French, German, Gujarati, Hindi, Haitian-Creole, Hebrew, Nepalese, Polish, Russian, Spanish and Vietnamese.

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

The Philadelphia Fire Department trains staff on PFD Directive #65, which outlines the protocol and procedure for using language interpretation services.

## 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 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, when applicable.

## 7. DATA COLLECTION AND ANNUAL REPORT

**Upon request by the OIA, PFD will provide the following annual information:**

1. Type of language services provided to LEP customers
2. Number of documents translated
3. PFD expenditures related to language services
4. Sample of languages spoken by bilingual staff
5. Number of staff trained on language access and/or cultural competency

PFD 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:**

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; and
6. Assessment of soliciting feedback from LEP individuals and community groups.

## **8. LANGUAGE ACCESS COMPLAINT PROCEDURE**

A formal Language Access grievance may be filed with the City of Philadelphia Office of Immigrant Affairs if one believes they have been wrongly denied language assistance services. The complaint must be filed 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  
[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 contact:**

Philadelphia Commission on Human Relations  
The Curtis Center  
601 Walnut Street., Suite 300 South  
Philadelphia, PA 19106  
(215) 686-4670

More information on the Philadelphia Commission on Human Relations can be found at [www.phila.gov/humanrelations](http://www.phila.gov/humanrelations)

## 9. TIMELINE FOR IMPLEMENTATION

The PFD has had PFD Directive #65 in place since April 2016. The department will continue to monitor usage and translate documents, especially fire prevention information, into other languages.

The Philadelphia Fire Department will also provide additional refresher training on PFD Directive #65 in 2023, with the assistance of the Office of Immigrant Affairs.

## 10. SIGNATURE PAGE

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Date: 2023.02.17 11:53:43 -05'00'

Dana Jackson  
PFD Language Access Coordinator

January 30, 2023

X 

Adam K. Thiel  
Fire Commissioner

January 30, 2023

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