

OFFICE OF THE DIRECTOR OF FINANCE:

**ACCOUNTING, ADMINISTRATIVE SERVICES, BUDGET, FINANCE
PROGRAM MANAGEMENT OFFICE, INTERNAL CONTROLS AND
COMPLIANCE, ONEPHILLY, PAYROLL, AND RISK MANAGEMENT**

LANGUAGE ACCESS PLAN

Last Updated in 2023

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I. INTRODUCTION

A. PURPOSE AND AUTHORITY

This plan encompasses the following units within the Office of the Director of Finance: Accounting, Administrative Services, Budget, the Finance Program Management Office, Internal Controls and Compliance, OnePhilly, Payroll, and Risk Management.

B. GENERAL POLICY

- i. The Office of the Director of Finance recognizes that we provide services for a population that includes individuals who are Limited English Proficient (LEP). It is the policy of the Office of the Director of Finance to ensure meaningful access to LEP individuals. Finance adopts the following policy to ensure that LEP individuals can gain equal access to our services and communicate effectively.
- ii. 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 in English. The Office of the Director of Finance intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Office of the Director of Finance seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.
- iii. *Responsibility Statements:*
 - The Office of the Director of Finance, rather than the LEP customer, bears the responsibility for providing language-appropriate services. Staff at the initial point of contact have the specific duty to identify and record language needs.
 - Use of informal interpreters such as family, friends of the person seeking service, or other customers must 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.
- iv. *Preferred Method of Service:*
 - The preferred method of serving LEP customers is by using competent bilingual staff who are able to provide services directly to the customer in his/her primary language without the need for an interpreter.
 - Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.
 - Staff should seek assistance from professional in-person or telephone interpreters when staff cannot meet language needs. Departments should recognize that certain

circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available.

- Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the customer.

C. LANGUAGE ACCESS COORDINATOR

Dung Nguyen, Executive Direction, Office of the Director of Finance
Municipal Services Building, Suite 1330
Dung.Nguyen@phila.gov

II. DIRECT CONTACT WITH LEP INDIVIDUALS

Accounting, Administrative Services, Budget, the Finance Program Management Office, Internal Controls and Compliance, OnePhilly, and Payroll are internal service departments/offices and therefore primarily interact with City employees and vendors. There are few, if any, LEP City employees.

Risk Management has a few points of contact with the public:

- The submission of forms: Any individual who wishes to file a claim against the City for bodily injury or property damage must complete a claim form. The form is available via the website and through the mail upon request. A form is also required for any non-profit or community group who wishes to obtain Special Event Liability Insurance.
- Phone inquiries: LEP individuals will occasionally call Risk Management with questions regarding the services provided.
- Office walk-ins: Risk Management receives up to three LEP walk-in visitors each month.

III. 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, Finance will continue to provide an interpreter at no cost to the resident. Services offered include telephonic interpretation and limited in-person interpretation.

2. Protocols

Interpretation services will be provided pursuant to the following scenarios:

- An individual approaches or calls an employee and appears to be asking for help but has difficulty communicating what the individual needs, and/or
- A request for an interpreter is made orally, in writing, or by pointing to a language card.

3. Procedures

- When a bilingual staff person is available, the available individual will be called upon to provide interpretation either in person or over the phone. If bilingual staff persons are unavailable, the employee will call the Language Services Associates service and request an interpreter to provide immediate interpretation either for a walk-in or a telephone encounter. The process is outlined as follows:

Telephonic Interpretation

Finance employees can get an immediate, 24/7, over-the-phone interpreter by calling one of the following vendors:

- United Language Group (ULG), providing a five-digit access code.
- GLOBO, providing a four-digit PIN.

Provide the following information when greeted by a coordinator: Department name, division/office name, and your name.

If an LEP individual requests interpretation for a future scheduled meeting, telephonic or in-person interpretation may be used. The process is outlined as follows:

Pre-scheduled Interpretation

Finance employees can request an interpreter for a remote event in Zoom or in-person event by contacting the following vendors: *Nationalities Service Center* or *GLOBO*. This service is available 24/7; however, the request must be made at least 48 hours in advance of the appointment date.

Alternatively, the Nationalities Service Center (NSC) may assist you with this request and help you find an interpreter, if notified with enough notice. Please email intrequests@nscphila.org and copy Dung.Nguyen@phila.gov, Maria.Giraldo-Gallo@phila.gov and OIA@phila.gov.

For specific details on any procedures, Finance employees can contact the department's Language Access Coordinator (Dung.Nguyen@phila.gov).

B. TRANSLATION

1. Services Provided

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

2. Protocols

Finance has developed a list of vital documents related to offered services:

- Risk Management: “General Claim Information Form” (and cover letter) and “Special Event Liability Insurance Application.” These documents have been translated into Spanish. Finance will request translation into other languages as needed.

3. Procedures

To submit a document for translation, staff can contact Powerling, copying the Language Access Coordinator (Dung.Nguyen@phila.gov) and the Language Access Program Director (Maria.Giraldo-Gallo@phila.gov).

For specific details on any procedures, Finance employees can contact the department’s Language Access Coordinator (Dung.Nguyen@phila.gov).

C. BILINGUAL STAFF

The department encourages staff to self-report their language skills in the City’s HR and Payroll system, OnePhilly. Finance employees have self-reported that they speak the following languages:

	American Sign Language	Cambodian	Cantonese	Chinese Cantonese (Includes Yueh), Mandarin	Gujrati, Hindi, Hindi	Hindi, Kanarese Also Canarese (Includes Kannada), Tulu	Hindi, Malayalam, Urdu	Hindi, Telugu	Malayalam	Spanish	Tagalog	Vietnamese	Yoruba
Asian		1	1	1	1	1	1	1	2		1	1	
Black/African American													1
Hispanic/Latino										5			
White	1												
Total	1	1	1	1	1	1	1	1	2	5	1	1	1

**Data includes active employees in Finance as of March 2023.*

Current staff who have expressed interest in volunteering to support LEP individuals are listed below:

	Languages Spoken	Number of Staff
	Tagalog	1
Total	1	1

D. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS

1. Finance will circulate this language access policy and related protocols to all staff within 30 days after adoption.
2. After every policy revision, Finance will circulate the revised policy and protocols to all staff after adoption.
3. Within twelve months of the adoption of this policy, all staff who have regular interaction with LEP individuals will receive cultural competency training given by the Office of Immigrant Affairs, as well as training in regard to this policy.
4. All new staff members who will have regular interaction with LEP individuals will receive training on how to use language services within six months of the beginning of their employment in their new position.

LEP 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
- Obtaining interpreters (in person and over-the-phone)
- Using and working with interpreters
- Translating procedures
- Using or not using bilingual staff as in-house interpreters

IV. NOTICE OF THE RIGHT TO LANGUAGE ACCESS

- Posters notifying LEP individuals of their right to language services are displayed in areas of public contact. These posters contain a simple message – such as “*Free interpreter services are available. Please ask for assistance*” – and are available in English as well as in Spanish.
- Document taglines informing the public of their right to translation and interpretation will be explored.

V. DATA COLLECTION AND ANNUAL REPORT

A. DATA COLLECTION

The following information will be monitored and collected and will be collected via annual reports:

- Number of telephonic interpretation occurrences by language
- Number of documents translated
- Language services expenditures
- Number of bilingual staff
- Number of staff trained in language access/cultural competency

B. ANNUAL REPORT

1. Finance will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness, and identify new goals or strategies for serving LEP individuals. The evaluation will include the following:
 - Assessment of the use of telephonic interpretation, in person interpretation, and translation services.
 - Assessment of the number and type of language requests.
 - Assessment of whether the staff understand the Language Access Plan and procedures, how to carry them out, and whether language assistance resources are up-to-date and accessible.
 - Assessment of any complaint information
2. Evaluation results and recommended changes will be shared by OIA's Language Access Coordinator and incorporated into the annual report which is required to be filed under Philadelphia Home Rule Charter § 8-600.

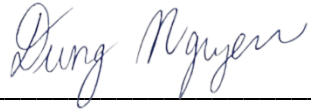
VI. LANGUAGE ACCESS COMPLAINT PROCEDURE

Anyone who believes they have been wrongly denied the benefits of this Language Access Plan, may file a formal Language Access grievance with the Office of Immigrant Affairs. The complaint must be filed within 6 months of alleged breach and must be submitted via a Language Access Grievance Form (which will be available on OIA's website) and submitted in person, by mail, or by email to:

Office of Immigrant Affairs
Maria Giraldo Gallo
Director of Language Access Programs
City Hall, Room 162
Philadelphia, PA 19107
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 (see www.phila.gov/humanrelations) and submit it in person or by mail to:

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



Language Access Coordinator
Office of the Director of Finance



Finance Director
Office of the Director of Finance