

**PHILADELPHIA COMMISSION ON HUMAN RELATIONS
LANGUAGE ACCESS PLAN & PROTOCOL
2023**

I. PURPOSE AND AUTHORITY

In Cooperation with the Mayor's Office, the Philadelphia Commission on Human Relations (PCHR) 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 PCHR 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.

II. GENERAL POLICY

PCHR recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of PCHR to ensure meaningful access to LEP individuals. PCHR adopts the following policy to ensure that LEP individuals can gain equal access to PCHR services and communicate effectively.

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. PCHR intends to take reasonable steps to provide LEP persons with meaningful access to services and programs.

PCHR seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

PCHR, rather than the LEP customer, bears the following responsibilities:

- 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 services, 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.

The preferred method of serving LEP persons is by:

- Using competent bilingual staff 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 telephonic interpreters when staff cannot meet language needs.

III. PCHR/FHC LANGUAGE ACCESS COORDINATOR

Language Access Coordinator

Monica Gonzalez Executive Secretary

Commission on Human Relations and Fair Housing Commission-

601 Walnut Street

Suite 300 South

215-686-4674

Monica.Gonzalez@phila.gov

IV. DIRECT CONTACT WITH LEP INDIVIDUALS

The PCHR and FHC has several points of contact with the public:

1. **Office walk ins** - Several times a week LEP individuals come into PCHR/FHC's office looking for help in obtaining services. In these instances, if there is no bilingual staff available to interpret, staff uses telephonic interpretation.
2. **Meetings/Information Sessions** - At times PCHR/FHC will hold meetings or information sessions. If language needs are anticipated, PCHR and FHC will utilize in person interpretation for appropriate language.

V. LANGUAGE ACCESS SERVICES AND PROTOCOLS

A. INTERPRETATION

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:

1. An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or
2. When a request for an interpreter is made either orally, in writing or by pointing to a language card, the employee shall determine whether bilingual staff in the office is available who speaks the language being requested.

When bilingual staff are not available, the employee shall contact a telephone interpreter service to provide interpreter services, the process to do so outlined below:

Telephonic Interpretation

PCHR/FHC makes telephonic interpretation services available in its main office through Globo Language Solutions. The telephonic interpretation service is available in over 170 languages.

PCHR staff can get an over-the-phone interpreter by calling the following vendor: Globo Language Solutions. This service is available 24/7.

To submit a request, call 267-318-4461 and provide the access code :XXXX.

When an LEP person requests in-person interpretation for a future meeting, telephonic or in-person interpretation may be used, the process for requesting an in-person interpretation is below:

In-Person Interpretation

Staff can request an in-person interpreter by contacting the following vendor: Nationalities Service Center. This service is available 24/7, but please give more than 48 hours notice whenever possible. In an emergency, use a telephonic interpreter.

Signage

The PCHR/FHC displays brochures/handouts in their office to better aid the public in obtaining services.

Website

PCHR/FHC will take reasonable steps to translate public website content and electronic documents that contain vital information about agency programs and services.

Before submitting a request for in-person interpretation, please receive approval from Monica Gonzalez.

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

- Fill out the 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 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.)

1. Email the editable document to Office of Immigrant Affairs - Language Access Program Manager at Maria.Giraldo-Gallo@phila.gov
2. PCHR/FHC will submit the translation request to translation vendor to obtain a quote.
3. PCHR/FHC will email you a quote with a time estimate for delivery of the translation.
4. Quote must be authorized by person with authority.
5. Quote is then signed and emailed back to OIA.
6. PCHR/FHC will email you the translated documents.

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

The content has not already been translated into another document

The document and translation procedure have been approved by your supervisor. The document is in a format that can be edited (e.g. MS Word, Publisher, InDesign, etc.)

Terms that do not want translated are highlighted, i.e. the name of your unit, program or street.

The document is written so it can be understood by readers with lower literacy skills.

If the translation is a continuation of a series or collection of documents, staff may request the same vendor to keep the translation consistent.

B. BILINGUAL STAFF

This list identifies the languages spoken by PCHR/FHC staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.

1. Spanish

C. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS

- a. PCHR/FHC Language Access Plan & Protocol will be posted online and provided as an electronic copy to all PCHR staff members at hiring.
- b. All staff providing technical assistance, training or receiving inbound calls will receive annual LEP training, or training upon employment, and then annually.
- c. 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;
 - 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; and
 - Using or not using bilingual staff as in-house interpreters.

PCHR/FHC will circulate this language access policy and related protocols to all staff within 30 days after adoption. Every two years, PCHR and FHC will circulate the revised policy and protocols to all staff after adoption. Within twelve months of the adoption of this policy, PCHR and FHC 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 a year of the beginning of their employment with PCHR and FHC. 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 the PCHR and FHC 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.

Orientation- New staff training will be provided on the PCHR and FHC Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

D. FUTURE PLANS

1. **Ensure that the public knows about the availability of these services.** The office will continue to inform the public about its translation resources through social media, visible multilingual signs and will train all its staff on using telephonic interpretation services.
2. **Translation of vital documents.** PCHR/FHC will continue to edit all public materials for plain language and to extensively translate important agency documents and materials. PCHR/FHC has developed a list of the documents that are vital to the access of LEP persons. Vital Documents to be translated include:
 - Consent and complaint forms
 - Intake application forms
 - Written notices of rights
 - Notices of denials, losses or decreases in benefits
 - Notices of disciplinary action
 - Signs
 - Notices advising LEP individuals of free language assistance services

VI. ONGOING ASSESSMENT.

PCHR/FHC will determine future plans after collecting data to illustrate the demand and-need of language interpretation and translation. The following information will be required to be monitored and collected by front-line staff and will be aggregated via quarterly reports by PCHR/FHC:

- Number of LEP encounters (By Language), ASL encounters, when they occurred and total time of interaction
- Type of Language Services Provided to LEP residents
- Number of Documents Translated
- Language Services Expenditures
- Additionally, Language Access Coordinator will be required to report quarterly on the following:
 - Number of bilingual staff
 - Number of staff trained in Language Access/Cultural Competency

PCHR/FHC 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 designated staff will lead the evaluation including the following:

- the use of telephonic interpretation, in-person interpretation and translation services.
- data collected about the LEP's primary language.
- the number and types of language requests during the past year.
- 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.
- complaint information; and
- feedback from LEP individuals and community groups.

PCHR/FHC intake personnel 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 Limited English Proficient, the person's language of choice will be noted for future visits.

PCHR/FHC 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.

Evaluation results and recommended changes will be shared by PCHR/FHC 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, PCHR/FHC will request comments and feedback from visitors that have received language services and establish a tracking system to collect primary-language data for individuals that participate in programs and activities.

VII. LANGUAGE ACCESS COMPLAINT PROCEDURE

You may file a formal Language Access grievance with PCHR 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 Maria Giraldo-Gallo
Language Access Program Manager Municipal Services Building
1401 JFK Blvd., 14th Floor, Suite 1430 Philadelphia, PA 19102
E-Mail: maria.giraldo-gallo@phila.gov
The form will also be available on the OIA website.

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

VIII. TIMELINE FOR IMPLEMENTATION

The following timeline will be used to implement the language access plan.

- Submit Language Access Plan to the Office of Immigrant Affairs – March 31, 2023
- Public translated documents – April 30, 2023
- Explore training opportunities for staff – May 2023
- Set up systems to collect data – June 30, 2023
- Train frontline responders annually
- Complete annual report

SIGNATURE PAGE

Monica Gonzalez 3/9/23 MG

Monica Gonzalez

Language Access Coordinator Executive Secretary

Commission on Human Relations and Fair Housing Commission



Kia Ghee, Esq.

Executive Director

Commission on Human Relations and Fair Housing Commission