



Office of Immigrant Affairs

CITY OF PHILADELPHIA

City of Philadelphia – Office of Immigrant Affairs

Language Access Plan

Updated 2025

1. Purpose & Authority

- A. In Cooperation with the Mayor's Office, the Office of Immigrant Affairs 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").
- B. This Language Access Plan establishes an effective protocol for the Office of Immigrant Affairs ("OIA") staff to follow when providing services to, or interacting with, individuals with a non-English language preference. Following this plan is essential to our office's goals: supporting the wellbeing of immigrant communities by recommending and developing policies and programs that open access to services; facilitating the successful integration of immigrants into the civic, economic and cultural life of Philadelphia; and highlighting the contributions and the essential role that immigrants have played and continue to play in the City of Philadelphia.
- C. The Office of Immigrant Affairs adopts the following policy to ensure that all individuals can gain equal access to the Office of Immigrant Affairs' services and communicate effectively. This plan applies to all Office of Immigrant Affairs programming and events.

2. General Policy

A. Eligibility

Language access services are extended to any individual with limited English proficiency or a non-English language preference. These services are provided free of charge to residents of Philadelphia and members of the public. This policy applies to all OIA programming and events. It is the City's and the Office of Immigrant Affairs explicit policy to ensure meaningful access to all individuals, including increasing its capacity to benefit people in their primary language. OIA staff have access to tools for identifying the specific languages needed. Eligibility for an individual to receive services may be identified by any of the following cases:

1. The client expresses or demonstrates a non-English language preference.

2. An accompanying or referring individual identifies the client's non-English language preference.
3. The client struggles to begin or maintain clear, fluid communication in English.
4. Any other reason is given to indicate that a client would benefit from language services or that English-dominant communication poses an undue barrier to services.

B. Core Responsibilities

The Office of Immigrant Affairs bears the following explicit responsibilities:

1. The Office of Immigrant Affairs, rather than the public, bears the responsibility for making appropriate language services available and accessible for our events and programming.
2. Staff at the initial point of contact have the specific duty to identify and record language needs.
3. For the protection of City staff and residential clients, we strongly discourage using informal translators (untrained staff, friends/colleagues/children of the client, etc.).
 - a. Minor children are always prohibited from acting as interpreters.
4. No staff may suggest or require that a member of the public provide their own interpreter to receive services.

C. Methods of service

1. Using culturally competent bilingual staff who can welcome and generally assist the residents in their primary language during walk in visits.
2. Seeking assistance from professional in-person, telephonic or video interpreters when staff cannot meet language needs.
3. Recognition 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 individuals of our multilingual communities.

3. Language Access Coordinator or Committee

Language Access Coordinator

Deise Rodrigues

Director of Language Access Programs
City of Philadelphia Office of Immigrant Affairs

Language Access Committee

Kahlil B. Thomas

Translation Quality Coordinator
City of Philadelphia Office of Immigrant Affairs

4. Outreach & Community Engagement

The Office of Immigrant Affairs has several points of contact with the public:

- A. **Office Walk-ins**- occasionally, individuals visit the Office of Immigrant Affairs looking for help to obtain services. If there is no bilingual staff available to interpret when a resident comes with a different language preference, staff will use telephonic or video interpretation. Instructions on how to request telephonic interpretation and download apps to access on demand video or audio interpretation will be made available to staff.
- B. **In-person encounters**- our staff uses the following tools to determine what their primary language is:
 - 1. "I Speak" cards
 - 2. "Language Help Here" posters
 - 3. "Point your Language" cards and posters
 - 4. "One Minute Please" cards and posters
 - 5. Staff uses their language skills and experience to assess language needs of individuals
- C. **Phone calls**- during business hours, individuals who need language access may call OIA. Staff has two interpreter lines to access interpreters in multiple languages and can make a conference call if needed.
- D. **Meetings/Information Sessions**- at times OIA will hold meetings or information sessions. If language needs are anticipated, OIA will utilize in-person interpretation for the appropriate language(s). Invitations to request a language for interpretation will accompany all invitations to public OIA events. Instructions on how to request services for meetings ahead of time will be available to staff. OIA will make a best-faith effort to honor all interpretation requests for our programming.
- E. **Events**- OIA hosts several events throughout the year. If language needs are anticipated, OIA will utilize in-person interpretation or video interpretation for the appropriate language. OIA will include taglines and other information for requesting interpretation services ahead of time. OIA will make a best-faith effort to honor all interpretation requests for our programming.
- F. **Materials**- OIA uses many written communication tools printed and/or digital to engage immigrant communities and share resources. OIA will use certified and trained translators to deliver materials in multiple languages. OIA make sure documents are written in plain language before translated into other languages. OIA will make a best-faith effort to translate any OIA materials into any language requested by a resident of Philadelphia, City agencies, or local public-facing organizations. OIA vital written documents in multiple languages are available [here](#).
- G. **Interpretation equipment**- OIA has two sets of interpretation equipment to support simultaneous interpretations during events. City departments can book OIA equipment as needed.

5. Language Access Services and Protocols

A. Interpretation

Interpretation is a real-time *spoken (or signed)* service.

Interpretation services offered include:

- 1. In-person interpretation
- 2. Telephonic (over-the-phone) interpretation
- 3. Video interpretation (via Zoom, Microsoft Teams, or another video service)

Protocols

Common interactions with individuals who express a non-English language preference are outlined below. Interpretation services may be scheduled in advance or provided on-demand (i.e. unscheduled) dependent upon the availability of OIA staff and the nature of the interaction. The procedure for facilitating these interactions is detailed in the following sub-section, *Staff Procedures*.

1. Telephone calls

Individuals often contact the OIA office via telephone to request assistance. In these instances, language services are provided in the form of unscheduled telephonic interpretation.

2. Walk-ins

Individuals occasionally visit the OIA office in person to request assistance. In these instances, language services are provided in the form of unscheduled in-person interpretation performed by OIA staff, unscheduled telephonic interpretation or unscheduled video interpretation.

3. Planned events

OIA occasionally hosts or attends events where the need for an in-person interpreter can be anticipated. In these instances, OIA will schedule an in-person interpreter for the event based on language preferences as indicated by event attendees.

When approached by a member of the public who appears to need service in another language, OIA staff should:

1. Indicate willingness to assist.
2. Identify the language needed. If necessary, language identification posters are available in the Office of Immigrant Affairs.
3. Provide the appropriate language access service:
 - a. If there is a bilingual member of OIA staff available, that staff member may act as an interpreter for the interaction.
 - b. If bilingual members of staff are busy or the language needed is not represented among the staff, OIA staff will provide interpretation using a telephone or video device. Download and login information will be provided to all OIA staff as part of language access training.

Staff Procedures

In-person Interpretation

Scheduled in-person interpretation requests may be made at any time (i.e. “24/7”) but, when possible, should be submitted at least two weeks in advance of need. Whenever possible, provide additional advanced notice. For emergencies, use the telephonic interpretation service.

To request an in-person interpreter, contact GLOBO:

1. Sign into GLOBO at phila.globohq.com using an OIA account
 - i. Click [*On-Site Interpreting*](#) on the menu on the left
 - ii. Click [*New On-Site Appointment*](#) Fill out and submit the request form

- iii. You will receive an email confirming receipt of the request and an additional email once the interpreter has been confirmed
- iv. Cancellation requests for in-person interpretation request should be submitted no later than one full business day in advance of the scheduled appointment time to avoid incurring fees for the service.

On demand in-person interpretation may be performed by an OIA staff member given that they are fluent in the language of the individual requesting assistance. The fluency of staff members is outlined in the *Multilingual Staff* section of this document.

Telephonic Interpretation OIA has two telephone set up two telephone numbers to connect with interpreters. The Language Access Coordinator will provide staff with numbers and PIN to make calls. Information is also available on our intranet.

Telephonic interpretation requests are handled in the same manner as scheduled in-person interpretation apart from choosing Scheduled Calls and Add Scheduled Call Appointment within the vendor platform.

Telephonic interpretation is available at any time (i.e. “24/7”) via the vendors GLOBO or LSA.

GLOBO service requests are handled in the following manner:

1. Staff are provided with a telephone number and PIN (aka access code) by their Language Access Coordinator.
2. To use the service, staff will call the telephone number provided and follow the prompts or speak to the operator to request a language.
 - a. Note: Operators may help identify a language if needed.
 - b. Staff may use a desk phone or mobile phone to make a conference call with an interpreter.
3. LSA service is accessible via a [desktop or mobile device](#) application.
 - a. To access the desktop application staff should submit a request to the Office of Innovation and Technology Support Center at (215) 686-8213 or email: ithelp@phila.gov.
 - b. To access the mobile device application staff should submit a request to MDO Telecom Coordinator, [Rhonda Williams](#), for approval.

Video Interpretation

Unscheduled video interpretation is available at any time (i.e. “24/7”) via the vendor LSA.

LSA service is accessible via desktop or mobile device by following the same process documented for LSA’s unscheduled telephonic interpretation.

During an active video conference service may also be requested by sending an email to an organization-specific address with the target language specified in the subject line and the meeting URL specified in the body. An interpreter should join the meeting within moments.

Note: wait times and availability can vary by time and by language.

Future Plans

1. Use telephonic interpretation, and ensure that the public knows about the availability of these services. The Office of Immigrant Affairs makes telephonic interpretation services available in its main office. The telephonic interpretation service is available in over 100 languages. The office will continue to inform the public about these resources through social media, visible multilingual signs and will train all staff on using telephonic interpretation services.
2. Grow in-person interpretation services. The Office of Immigrant Affairs can offer in-person interpretation for scheduled meetings and events as needed if given enough notice. OIA will continue to inform the public about these resources through social media, visible multilingual signs and will train all staff on requesting in-person interpretation services.

B. Translation

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 translations, at no cost, for LEP individuals. This includes translations of vital documents, signage and portions of our website.

Protocol for Document Translation

Vital Documents - Vital written documents include but are not limited to: consent and complaint forms; written notices of rights; notices of public meetings; and notices advising LEP individuals of free language assistance services. Vital documents will be translated in Spanish, Portuguese, Chinese (Simplified), Vietnamese, Russian, and Arabic, as well as any specific language requested by a member of the public. Vital Documents to be translated include:

1. "I Speak" Language Cards
2. Immigration Resource Guides
3. Flag Raising Application & Checklist

Staff Procedure to request a document for translation:

1. Staff can select from two vendors: Powerling and GLOBO to request translation
 - a. For Powerling staff will complete a request form [Translation Request Form](#)
 - b. For GLOBO, they will access the [GLOBO Portal](#)
 - i. Have an editable document
 - ii. OIA obtains a quote from translation vendors
 - iii. Quote must be approved
 - iv. Translation will be delivered by vendor by the time estimate in the quote
2. Public Procedure to request an OIA vital document translation:
 - a. Email a request to the Office of Immigrant Affairs at ويا@phila.gov
 - b. Identify the document requested and the requested language
 - c. OIA staff will commission a translation from the translation vendor
 - d. The final translation will be shared with the requestor and added to OIA's website.

NOTE: Before submitting a document for translation, please review your document and ensure the following: The content has not already been translated in another document.

The document is in a format that can be edited (e.g. MS Word, Publisher, InDesign, etc.)

Terms you 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.

Signage

Currently, the Office of Immigrant Affairs does not have public signage in their office that would require translation.

Website Translation

The OIA Website contains information about public meetings and events concerning the city and immigrant communities, as well as information about language access in the city. The information will be translated and available in other languages as it is developed. OIA pages will make use of available machine translation tools when human translation is unnecessary or impossible.

Future Plans

1. OIA will develop a plan to continuously identify languages in highest demand in Philly, which will include a community feedback component.
2. OIA will develop a digital language access “toolbox”. The language access toolbox will benefit City staff and community members in understanding and using language access services. These tools will facilitate smooth, high-quality language access across City agencies, implement quality assurance measures, and improve interactions between multilingual communities and staff.
3. OIA will publish the OIA Newsletters in Spanish and plan to publish in the top 10 most spoken languages in Philadelphia.
4. OIA will advocate for and develop a robust, research-based quality assurance process that incorporates multilingual City staff and compensates them for their expertise.
5. OIA will work with the Office of Innovation and Technology (OIT) to develop policy on using Artificial Intelligence (AI) and Machine Translation (MT) in language access.

6. Multilingual Staff

A. This list* identifies the number of staff who natively speak language beyond English and/or are linguistically, culturally, and technically support with general information during walk ins.

Language	Number of Staff
Arabic	1
Brazilian Portuguese	1
Spanish	1
French	1
Vietnamese	1

*List current as of January 2025. Staff has not received formal training in interpreting and translations.

B. This list* identifies the number of staff who speak languages beyond English:

Language	Number of Staff
Arabic	1
Brazilian Portuguese	2
Spanish	3
French	1
Haitian Creole	1
American Sign Lang.	1

*List current as of January 2025. Staff has not received formal training in interpreting and translations.

Future Plans

1. 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 and internship announcements.
2. If bilingual or multilingual skills are required for any job opening, a candidate's language proficiency will be assessed during selection. Assessment may include tests, certification, transcripts, diplomas, and or other evidence of language proficiency in English and another language.
3. Staff Interpreters- Competent and trained bilingual staff can also function as interpreters for other staff when available and necessary. OIA currently does not have a formally trained interpreter.
4. Additional compensation- OIA plans to pilot a program to apply Administrative Board Rule 11.C.12, so any exempt employee can be compensated for completing work on OIA-assigned language access projects. OIA will depend on budget approval to implement the pilot. The Managing Director's Office Leadership decides on budget matters.

7. TRAINING STAFF

A. Training Protocol

The Office of Immigrant Affairs Language Access Plan is part of new employment training and is provided to all OIA staff members at hiring.

All staff will receive language access training upon employment and then refresher courses annually or as needed.

Language access training will include information on the following topics:

- a. The Federal, State and local legal obligation to provide language access services
- b. Language access plan and protocols
- c. How to access interpretation services and work with interpreters
- d. How to request translation services

- e. Preparing technical devices for language access needs

Future Plans

The Office of Immigrant Affairs will work to expand language access training to include engagement workshops on the following topics:

1. Plain language.
2. Quality Assurance in City Language Access.
3. Cultural competency.
4. Understanding multilingual communities' needs and identify potential barriers.
5. Language mapping: how to use language data to plan outreach for individuals with limited English proficiency or a non-English language preference.
6. AI in language access.

8. ADMINISTRATIVE HEARINGS

This section applies to departments that hold administrative hearings. State law (2 C.S. § 561 et seq. (Act 172 of 2006)) requires the appointment of certified or otherwise qualified interpreters for local administrative hearings. In this section, list the protocols for language access in administrative hearings.

Currently, the Office of Immigrant Affairs does not hold administrative hearings.

9. NOTICE OF THE RIGHT TO LANGUAGE ACCESS

1. Posters notifying individuals with limited English proficiency or a non-English language preference of their right to language services will be displayed in our main office, which is primarily the area of public contact. These posters will contain information regarding free interpretation services and different languages for individuals to indicate which language they need assistance in.
2. Department notices and flyers will also provide notice of the availability of language services with simple instructions on how to request language assistance, if applicable.
3. Taglines will be included in or attached to public documents and notices that explain that individuals with limited English proficiency or a non-English language preference can obtain a translation of the document or that an interpreter can be made available.
4. Staff and individuals with limited English proficiency or a non-English language preference will also have access to the City of Philadelphia Language Access Cards. These are cards with a detachable wallet-size card that say in both English and a second language: "I speak (language). I need assistance and would like an interpreter."
5. In all areas of public contact, the Office of Immigrant Affairs will post and maintain clear and readable signs in the City's most prevalent languages notifying individuals that free translation and interpretation services are available to them.
6. Display a "Language Card" or poster where residents can point to the language that they need help in.

10. DATA COLLECTION AND MONITORING

A. Data Collection

The following information will be required to be monitored and collected by departments and will be reported during Language Access Mandated Annual Report to the Office of Immigrant Affairs:

1. Number of LEP Encounters (by Language)
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 annually on the following:

1. Number of bilingual staff
2. Number of staff trained in Language Access/Cultural Competency

The Office of Immigrant Affairs will supply all departments with a Language Access Data Collection form to assist in the reporting of this data.

B. Annual Report/Evaluation

1. The Office of Immigrant Affairs 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 residents with limited English proficiency or a non-English language preference. The designated staff will lead the evaluation with the assistance of the Director and Deputy Director. 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 residents' 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.
 - f. Assessment of soliciting feedback from individuals with limited English proficiency or a non-English language preference and our multilingual community; and
 - g. Assessment of soliciting feedback of city staff who use our language access services
2. Evaluation results and recommended changes will be shared by OIA's Language Access Coordinator and incorporated into an annual report which is required to be filed under Philadelphia Home Rule Charter § 8-600. The Language Access Coordinator will also keep a record of any language access services provided and will make this information available during the annual review process. For updates to the Language Access Plan, the Office of Immigrant Affairs 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.

11. LANGUAGE ACCESS COMPLAINTS

A. You may file a 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. We display public information about the right to file a complaint and procedures for filing a complaint on our website at <https://www.phila.gov/programs/language-access-philly/language-access-grievance-form/>.

Complaints are handled as follows:

1. The OIA language access team members will forward any complaint received to the agency's Language Access Coordinator (LAC).
2. The OIA language access team and the agency's Language Access Coordinator will investigate the cause and extent of issues with the impacted language services.
3. According to the situation, the OIA language access team will:
 - a. Assist the serving agency to immediately assist the complainant language access needs.
 - b. Council the serving agency on possible next steps to build or restore lasting, meaningful resolution.
 - c. Work with the agency's LAC for long term solutions to language access provide services, staff training, increase communication, allocate resources and language access budget.

Future Plans:

1. OIA will develop a compliant report template to document the action steps and outcomes of the complaints.

B. Additionally, any person, regardless of immigration status, may submit a formal legal complaint through the Philadelphia Commission on Human Relations. To do so, please call or email:

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

For more information on PCHR, please visit <https://www.phila.gov/departments/philadelphia-commission-on-human-relations/>

12. TIMELINE FOR IMPLEMENTATION

2025

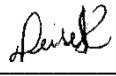
- Continue to provide interpretation and broadly translate vital documents.
- Create an evaluation to verify and monitor language access service quality.
- Have all current and new vital documents review in plain language by staff and/or readability plain language tools.
- Have all current and new vital documents translated and publicly available in the most common languages spoken for our immigrant communities.
- Have all employees trained in Language Access 101.
- Maintain public notice of available language services through posters and flyers available in our main office.
- Promote Language Access Rights during OIA events, programs, initiatives and newsletters.
- Review any Language Access comments or complaints and determine possible changes.
- Purchase an additional set of interpretation equipment.
- Maintain I Speak Card inventory and develop a distribution plan.

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- Develop language access toolbox.
- Write a proposal to hire dedicated staff for language access data, training, and technical assistance.
- Develop and implement a paid employee quality assurance program.
- Review Language Access Report, assess data and use it to make further changes to the Language Access Plan.
- Agency will adjust and update this plan as needed.

13- Signature Page

Office of Immigrant Affairs Language Access Committee

X  _____

Deise Rodrigues
Director of Language Access
Language Access Coordinator

X  _____

Kahlil B Thomas
Translation Quality Coordinator
Language Access Committee Member