

Office of the Youth Ombudsperson 2025 Language Access Plan

PURPOSE AND AUTHORITY

In Cooperation with the Mayor's Office, the Office of the Youth Ombudsperson 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").

This Language Access Plan establishes an effective protocol for the Office of the Youth Ombudsperson (OYO) to follow when providing services to, or interacting with, individuals with LEP or who prefer communicating in a language other than English. Following this plan and protocol is essential to the success of OYO's overall mission of improving the safety and quality of services for all Philadelphia youth in residential placements.

GENERAL POLICY

The Office of the Youth Ombudsperson (OYO) recognizes that the population eligible for its services includes individuals with Limited English Proficiency (LEP) or a non-English language preference. It is the City of Philadelphia's and OYO's policy to grant meaningful access to services and programs to every person, even if the person has a limited ability to speak, understand, read or write English. Through the adoption of this policy, OYO seeks to reduce barriers to services by increasing its capacity to serve people in their primary language.

OYO will provide language access services at no cost in the following circumstances:

- 1. An individual expresses or demonstrates a non-English language preference.
- 2. An accompanying or referring individual identifies the individual's non-English language preference.
- 3. The individual struggles to communicate with staff in English.

It is OYO's responsibility to make appropriate language services available and accessible through our materials, programming, and case management.

Principle Responsibilities:

- 1. Provide appropriate language services.
- 2. Identify and record any language needs at the initial point of contact.



- 3. The use of informal interpreters such as family members or friends of the person seeking services, or other individuals is discouraged.
 - a. Minor children are prohibited from serving as interpreters.
- 4. Staff may not suggest or require that an individual provide their own interpreter to receive services.

Language Services:

- 1. Use bilingual staff who are able to provide services directly to the individual(s) in their native language.
- 2. Seek assistance from professional in-person, telephonic or video interpreters when staff cannot meet language needs.
- 3. Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the individual. The OYO recognizes 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).

LANGUAGE ACCESS COORDINATOR

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DIRECT CONTACT

The Office of the Youth Ombudsperson has several points of contact with the public.

A. Online Complaints

Individuals that access the online complaint form via OYO's website will have English and Spanish versions available to them. Individuals that speak a language other than English and Spanish can contact OYO via phone or email and state they need assistance in another language. OYO staff will assist in providing interpretation and translation services.

B. Telephone Complaints

When OYO receives a call from an individual with LEP or who prefers to communicate in a language other than English, the call will be transferred to a staff member that speaks the desired language if available. If no staff members are available, the OYO staff member on the call will utilize telephonic interpretation.



C. In-Person Complaints

When an in-person interview/meeting/programming visit is scheduled with individuals with LEP or who prefer to communicate in a language other than English, a staff person who speaks the desired language should facilitate the meeting. If no staff members are available, OYO will use telephonic, in-person, or video interpretation depending on need and appropriateness.

D. Written Complaints

If OYO receives a complaint via mail or email that cannot be translated by an OYO staff member, OYO will obtain professional translation services in a timely manner.

E. Written Materials

OYO provides youth several handouts, including Know Your Rights guides, fliers, and info cards, at scheduled programming events. OYO will make every effort to inquire whether there will be youth who speak a language other than English, and if so, translate all documents in anticipation of the event. In the event advance notice was not possible, OYO will utilize bilingual staff or a certified interpreter over the phone to translate the document(s) to the young person in real time. OYO will professionally translate documents following the event and deliver the translated documents electronically, in person, or via mail in a timely manner to the youth.

LANGUAGE ACCESS SERVICES

<u>Language Access Philly</u> connects City of Philadelphia offices and programs to interpretation and translation services through City-approved vendors.

Interpretation

Interpretation is a real-time spoken or signed service.

Interpretation services include:

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

GLOBO

GLOBO is the City's most frequent provider for in-person, telephonic, and video interpretation. To access a telephonic Globo interpreter, call (267)-318-4256 and enter "1000" when prompted for the access code. You may access the City's online GLOBO portal at phila.globohq.com using our department's login username and password.



Under "On-Demand Services" select between "Telephone Interpreting" or "Video Interpreting". Scroll down to your department and click "Start Call." Select the language you need and click "Next". You will be taken to the call and connected with an interpreter.

If GLOBO is unavailable or insufficient, consider the City's alternative options.

PROPIO

Propio is a new provider with the City. To access an interpreter online or via phone, please see user card for instructions.

Translation

Translation is a written service for documents, posters, brochures, websites and other text.

Powerling is the City's most frequent provider for translation. If **Powerling** is unavailable or insufficient, consider the City's alternative option, **Globo**. The instructions on how to request translations are available here.

Available Translated Documents

The following documents have been translated into Spanish.

- PowerPoint presentations
- Complaint form
- Intake form
- Info card
- Survey
- Flier

Future Plans

- 1. Expand outreach into Philadelphia's Latino/a/e community to ensure Spanish-speaking youth and families are aware of OYO, its mission, and how to access services in their native and/or preferred language.
- 2. Work collaboratively with partners to determine the most prevalent languages of youth and families in Philadelphia's child welfare, juvenile justice, and behavioral health systems to ensure all OYO documents and materials are translated and available for use by these individuals and communities.



 Following identification of target communities, conduct strategic outreach to other diverse and immigrant communities to ensure all impacted individuals are aware of OYO and its services.

Multilingual Staff

We currently have an Associate Youth Ombudsperson who is a native Spanish speaker.

Staff Training

The OYO team will circulate this Language Access Plan to all staff within five days of adoption and every two years thereafter. All newly hired staff will receive the Language Access Plan and accompanying training as part of their onboarding. All OYO staff will also be able to access the Language Access Plan in the OYO SharePoint account whenever necessary. OYO will aim to revise the Language Access Plan every two years to ensure continued best practice. OYO staff will receive updated training with each new revision.

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 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
- Use of bilingual staff as in-house interpreters

In addition, OYO staff will receive cultural competence training every two years and upon hire.

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 areas 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. 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.
- 3. Staff and individuals with limited English proficiency or a non-English language preference will 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."

Language Access Complaint Procedure

If a person has a formal Language Access grievance with and believes they have been wrongly denied the benefits of this Language Access Plan, a complaint must be filed within six months of the alleged denial. To file a formal complaint, please contact in person, by mail or e-mail:

Maria Giraldo Gallo, PMP, Language Access Program Manager Office of Immigrant Affairs, 1401 John F. Kennedy Blvd, Suite 1430, Philadelphia, PA 19102 (215) 686-0876 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 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 (215) 686-4670

To access the form and for more information, please visit www.phila.gov/humanrelations

Data Collection and Annual Report

OYO is required to monitor and collect the following information and submit to the Office of Immigrant Affairs via annual reports.



- 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, OYO's Language Access Coordinator will be required to report quarterly on the following:

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

OYO will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness, review the progress of department goals and identify new strategies for serving LEP residents. The evaluation will include the following:

- 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.
- Assessment of soliciting feedback from LEP individuals and community groups.

The OYO Language Access Coordinator will share evaluation results and recommended changes and incorporate them into an annual report, as is required 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.

Signature

Tracie Johnson, Esq.
Language Access Coordinator
/s/ Tracie Johnson

Youth Ombudsperson