

LANGUAGE ACCESS PLAN
Mayor's Office
Community Empowerment & Opportunity

Prepared by:



Mayor's Office
Community Empowerment & Opportunity
215-685-3600

July 2016
Updated January 2017

MAYOR'S OFFICE
COMMUNITY EMPOWERMENT & OPPORTUNITY
LANGUAGE ACCESS PLAN & PROTOCOL
2016

1. PURPOSE & AUTHORITY

- A. "In Cooperation with the Mayor's Office, the **Mayor's Office of Community Empowerment & Opportunity (CEO)** 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. "The purpose of this document is to establish an effective plan and protocol for **CEO** 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 to **align the city's efforts to lift individuals and communities out of poverty and increase opportunities for low income individuals and families.**"

2. GENERAL POLICY

- A. CEO recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of CEO to ensure meaningful access to LEP individuals. CEO adopts the following policy to ensure that LEP individuals can gain equal access to CEO's services and communicate effectively. This Plan applies to all CEO offices and satellite offices.
- B. 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. CEO intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. CEO seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.
- C. CEO, rather than the LEP customer, bears the following responsibilities:
- (1) Providing language appropriate services.
 - (2) Staff at the initial point of contact have the specific duty to identify and record language needs.
 - (3) Use of informal interpreters such as family, friends of the person seeking services, or other customers must be discouraged.
 - (4) Minor children are prohibited from acting as interpreters.

(5) No staff may suggest or require that an LEP customer provide an interpreter in order to receive services.

- D. 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) Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.
 - (3) Staff should seek assistance from professional in-person or telephonic interpreters when staff cannot meet language needs.
 - (4) Departments should recognize that certain circumstances that might have legal implications 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 LEP person.

3. LANGUAGE ACCESS COMMITTEE

Language Access Committee

Sulaiman A. Wood (designated Coordinator)
Benefits Access Unit Manager
Direct: (215) 685-3624
Sulaiman.Wood@phila.gov

Wanda Cruz-Baltimore
Benefits Access Specialist
Direct: (215) 685-9745
Wanda.Baltimore@phila.gov

City of Philadelphia
Mayor's Office of Community Empowerment & Opportunity
1234 Market Street, 16th Floor
Direct: (215) 685-3600

Executive Director:
Mitchell Little
Mayor's Office of Community Empowerment & Opportunity

4. DIRECT CONTACT WITH LEP INDIVIDUALS

CEO has several points of contact with the public:

- (1) Office walk ins- Several times a week LEP individuals come into CEO'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 CEO will hold meetings or information sessions. If language needs are anticipated, CEO will utilize in person interpretation for appropriate language.
- (3) Community-Based Events-CEO's Benefit Access Unit periodically deploys its staff and mobile vehicle to provide services directly to individuals in their own neighborhoods and communities, CEO will use its bilingual staff to interpret; and or will telephonic interpretation if the language spoken cannot be properly interpreted by CEO staff.

5. 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, our department will continue to provide an interpreter, at no cost to the resident, for LEP individuals. Services offered include telephonic interpretation and in person interpretation.

2.) Protocols

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 bi-lingual staff in the office is available who speaks the language being requested.

3.) Procedures

- (1) When bilingual staff is not available, the employee shall contact a telephone interpreter service to provide interpreter services, the process to do so is outlined below:

Telephonic Interpretation – CEO can get an over-the-phone interpreter by calling the following vendor: Language Services Associates. This service is available 24/7.

To submit a request, call 866-592-XXXX and provide the following information when greeted by a coordinator:

- When prompted, please enter your five-digit access code: XXXXX
- Press 1 for Spanish, 2 Mandarin, 3 Cantonese, 4 Arabic, or 9 for all other languages.
- For Spanish, Mandarin, Cantonese and Arabic, the interpreted session may now begin.
- For all other languages, when greeted by a coordinator, request the language needed or ask for assistance in identifying the language.
- Hold momentarily while your interpreter is connected. Once on the line, you will be notified and provided with the interpreter's ID number.
- Explain the objective of the call to the interpreter. Then proceed by speaking directly to the Limited English Proficient speaker in the first person.
Example: "What is your name?" NOT "Ask her what her name is."
- Upon completion of the call, all parties should simply hang up. Your time will be automatically recorded.

(2) 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 – You can request an in-person interpreter be 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.

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

- o Fill out service request form and be sure to select interpretation
- o 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.)

4.) Future Plans

- Use telephonic interpretation, and ensure that the public knows about the availability of these services.** CEO makes telephonic interpretation services available in its main office through Language Services Associates. The telephonic interpretation service is available in over 170 languages. The office will continue to inform the public about these resources through social media, visible multilingual signs and will train its entire staff on using telephonic interpretation services.
- Grow in-person interpretation services.** CEO can offer in-person interpretation for scheduled meetings and events as needed through Nationalities Service Center if given enough notice. CEO will continue to inform the public about these resources through social media, visible multilingual signs and will train its entire staff on requesting in-person interpretation services.

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

2.) Protocols for Document Translation

a.) Vital Documents – CEO has developed a list of the documents that are vital to the access of LEP persons to CEO’s Benefits Access Unit (BAU) program. This list was developed with consideration of the applicable laws of the Commonwealth of Pennsylvania and City of Philadelphia. Documents have also been identified that may contain important information and will contain noticing of CEO language access services and how to obtain services. CEO BAU currently provides some vital documents in the following language(s): Spanish. Vital Documents to be translated include:

- ✓ Community Service Block Grant Intake Form;
- ✓ BAU Program Marketing Materials;
- ✓ Appointment Cards;
- ✓ Required Documentation for Benefit Application(s);
- ✓ Benefit Application(s); and
- ✓ Follow-up Information.

3.) Procedures

Procedure for Submitting a document for translation

- a. Email the editable document to Office of Immigrant Affairs – Language Access Program Manager at orlando.almonte@phila.gov.
- b. OIA will submit the translation request to translation vendor to obtain a quote.
- c. OIA will email you a quote with a time estimate for delivery of the translation.
- d. Quote must be authorized by person with authority.
- e. Quote is then signed and emailed back to OIA.
- f. OIA will email you the translated documents.

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

4.) Signage

The following signs will be translated into Spanish:

- Mayor’s Office of Community Empowerment & Opportunity at MSB—North (22nd St.);
- CEO Door at 1234 Market St., 16th Fl., 19107;
- Marketing Materials; and
- Portions of the mobile vehicle wrap

5.) Website

- a. The CEO website contains information about the entire range of CEO programs and activities. Currently there is no information and materials available on the website in multiple languages.
- b. In Fiscal Years 2017-18, CEO will translate additional select documents and make them available through the website, newsletter, and/or community engagement meetings and other events. CEO will periodically review the CEO web pages with the goal of improving its accessibility to LEP persons. This includes identifying the most important information to be translated and the best means for disseminating translations to LEP communities.
- c. Tag lines will be included in the website that explains that LEP individuals can obtain a translation of documents or that interpretation is available in our office.

6.) Future Plans

Language Access Goals:

Write public materials in plain English, and translate extensively. CEO’s Language Access Committee, housed within the Benefits Access Unit, will continue to edit all public materials for plain language and to extensively translate important agency documents and program materials. Translation services are centralized at CEO to ensure that translations are clear and consistent. Resources include Language Line Solutions, other translation vendors that perform quality-assurance reviews, and a full-time Spanish translator. The agency has a central budget for translation services in order to encourage broad translation of public materials, even if individual program budgets are limited, and to ensure that translations are done by a professional linguist. CEO’s Language Access Committee will continue to make these resources widely known throughout the agency and will continue to enforce agency protocols that support high-quality translations—for example, ensuring that translations are not done in-house (except by the agency’s designated translator) or by machine.

C. BILINGUAL STAFF

1.) Current Staff

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

MCEO Languages		
Bengali (1)	Hindi (1)	French (1)

Malayalam (1)	Spanish (4)	Tamil
---------------	-------------	-------

2.) Future Plans

CEO will determine future plans after collecting data to illustrate the demand and need of language interpretation and translation.

If the committee comes to a conclusion that additional staff is needed to meet LEP needs, the committee will recommend applying “bona fide occupation qualification” for community based positions.

D. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS

1) Training Protocol

- a. **CEO’s** Language Access Plan & Protocol is part of the staff handbook, posted on the intranet, and provided as a hard copy to all **CEO** staff members at hiring.
- b. **CEO** will distribute the LEP plan to all staff and will have a current electronic copy available so all staff will be knowledgeable of LEP policies and procedures.
- c. All staff providing technical assistance, training or receiving in-bound calls will receive annual LEP training, or training upon employment, and then annually.
- d. 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; and
 - Using or not using bilingual staff as in-house interpreters.
- e. **CEO** will circulate this language access policy and related protocols to all staff within **10 days** after adoption. Every two years, **CEO** will circulate the revised policy and protocols to all staff after adoption. Within **nine months** of the adoption of this policy, **CEO** 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 six months of the beginning of their employment with **CEO**. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.

- f. 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 **CEO's** 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.
- g. Orientation- New staff training will be provided on the CEO Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

2) **Future Plans**

- a. **Further standardize language access resources and tools across CEO.** CEO's Language Access Committee will work with frontline programs to update and standardize language access tools and resources across the agency. CEO will also work to ensure that all public-facing programs have appropriate language access signage and materials in multiple languages available at sites. Another goal is to update and refresh the agency's Volunteer Language Database of staff who speak languages other than English and who are willing to help review translated materials and/or assist with interpretation in emergencies. In addition, CEO will update its Language Access Toolkit, an internal resource for staff, and will meet with agency employees to share challenges and best practices.
- b. **Grow plain language and other language access-related trainings.** CEO will plan to hold plain-language training at its headquarters. The agency hopes to expand training opportunities on plain-language and cultural competency topics and will explore opportunities to do so.

6. **NOTICE OF THE RIGHT TO LANGUAGE ACCESS**

1. 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.' Posters will be displayed in English as well as the principle languages spoken in the service area.
2. Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.
3. Tag lines will be included in or attached to a document. Taglines in languages other than English can be used on documents written in English that describe individuals with LEP can obtain translation of the document or an interpreter to read or explain the document. Contact the office of Immigrant Affairs for support in creating tag lines.
4. In all areas of public contact and on its website, **CEO** will post and maintain clear and readable signs in the languages most prevalent in the City notifying LEP individuals that free translation and interpretation services are available to them.

7. DATA COLLECTION AND ANNUAL REPORT

A. Data Collection

The following information will be required to be monitored and collected by departments and will be collected via quarterly reports by 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 Committee will be required to report quarterly 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 sheet to assist in the reporting of this data.

B. Annual Report/Evaluation

- 1.) CEO 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 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 LEP's 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; and
 - f. Assessment of soliciting feedback from LEP individuals and community groups.
- 2.) CEO 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.
 - a. If the individual is Limited English Proficient, the person's language of choice will be noted for future visits.
 - b. CEO's Language Access Committee 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.
- 3.) Evaluation results and recommended changes will be shared by CEO's Language Access Committee and incorporated into an **annual report which is required to be filed under Philadelphia Home Rule Charter § 8-600**. The Language Access Committee 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, CEO 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

8. LANGUAGE ACCESS COMPLAINT PROCEDURE

You may file a formal Language Access grievance with the Office of Immigrant Affairs (OIA) 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
Orlando Almonte
Language Access Program Manager
City Hall, Room 110
Philadelphia, PA 19107
E-Mail: orlando.almonte@phila.gov

The form will also be available on OIA's website once the website is completed.

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

9. TIMELINE FOR IMPLEMENTATION

Implementation Plan Logistics

Major milestones in our plan will include:

- Continuing to broadly translate and interpret
- Updating agency language access tools and resources
- Exploring additional training opportunities

Timeline

2016

- The Language Access Committee (LAC) will meet with front-line CEO staff to discuss language access challenges, best practices and methods for tracking language access data by program/site, as well as to brainstorm ideas for new or updated language access resources these staff might need.
- LAC will update the agency's internal protocols for written translations and in-person interpretations, respectively.
- LAC will update its internal glossaries as needed.
- CEO will work closely with City Hall and will communicate with other City agencies about best practices, tools that can be shared and challenges.
- CEO will continue to broadly translate materials and provide on-site interpretation as needed, and to track these activities.

2017

- LAC will create a Language Access Toolkit (a language access policy and training tool) and will distribute the toolkit to staff in the agency's public programs.
- LAC will explore ways to track and certify CEO staff who speak other languages and who are willing to help review translations and provide interpretation services; this will include updating CEO's Language Database. The agency will evaluate alternative training and certification resources.

Updated

2016

- CEO created Language Access Plan
- CEO created Language Access Committee
- CEO will continue to broadly translate materials, provide on-site interpretation as needed, and track these activities.
- CEO begin to track language access needs and barriers upon approval of language access plan
- CEO will adjust and update this plan as needed.
- LAC will provide input on the above steps.

2017

- The work outlined in 2016 will continue.
- CEO will adjust and update this plan as needed.

10. SIGNATURE PAGE

Language Access Coordinator
Benefits Access Unit Manager
Mayor's Office of Community Empowerment & Opportunity

Executive Director
Mayor's Office of Community Empowerment & Opportunity