

LANGUAGE ACCESS PLAN

Prepared by:
Office of the City
Controller

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(City Controller's Office)
LANGUAGE ACCESS PLAN &
PROTOCOL
2024

1. PURPOSE AND AUTHORITY

The purpose of this document is to establish an effective plan and protocol in cooperation with the Mayor's Office 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 section 8-600 and A-200, for the City Controller's Office, in ensuring meaningful access to City services and programs for individuals with limited English Proficiency (LEP). Following this plan and protocol is essential to the success of our mission to the Mayor's Office.

2. GENERAL POLICY

- A. The Controller's Office recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the Controller's Office to ensure meaningful access to LEP individuals. The Controller's Office adopts the following policy to ensure that LEP individuals can gain equal access to the Controller's Office 'services and communicate effectively. This Plan applies to all Controller's Office 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. The Controller's Office intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Controller's Office seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

C. Responsibility Statements:

- The department, 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

D. Preferred Method of Service:

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. The Office of Immigrant Affairs intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Office of Immigrant Affairs seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

- The preferred method of serving LEP customers 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 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.

3. LANGUAGE ACCESS COMMITTEE

Language Access Coordinator: Andrea Rose, Administrative Services Director

Language Access Support:

John Combay, Auditor, john.combay@phila.gov, (215) 686-3960

Ezinma Nwoye, Assistant to City Controller, ezinma.nwoye@phila.gov, (215) 686-6698

Isaac Chen, Auditor, CPA, isaac.chen@phila.gov, (215) 686-3925

LANGUAGE ASSESS COORDINATOR

Andrea Rose

Language Access Program Manager

City of Philadelphia Controller's Office

1401 John F. Kennedy Blvd., Suite 1230

Municipal Services Building

Philadelphia, PA 19102

Direct: (215) 686-6690

andrea.rose@phila.gov

CITY CONTROLLER:

Christy Brady, CPA

4. DIRECT CONTACT WITH LEP INDIVIDUALS

The Office of the Controller's branch of Immigrant Affairs has one point of contact with the public; our reception area, however;

Meetings/Information Sessions – at times committee members of COIA (Controller's Office of Immigrant Affairs) will hold meetings or information sessions. If language needs are anticipated, COIA will utilize in person interpretation for appropriate language.

5. LANGUAGE ACCESS SERVICES AND PROTOCOLS

Services that are to be in place to provide language access to LEP individuals can include: Interpretation (in person and telephonic), as well as translation of documents and websites.

The LEP Committee will assist any employee and/or visitor interacting with the Controller's Office via, person, phone, website etc who needs assistance.

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

3.) Procedures

1.) Procedure

- A.) When bilingual staff is not available, the employee shall contact a committee person listed on page 5 to provide interpreter services, the process to do so outline below:

Telephonic Interpretation – any available committee member, their direct telephone numbers are listed

In-Person Interpretation - any available committee member

4.) Future Plans-

Use telephonic interpretation, and ensure that the public knows about the availability of these services.

- a. Future plans include, having a hotline number for LEP individuals to help with Community Affairs or to interpret what services are needed.
- b. Identifying all persons speaking more than one language fluently and having them be available to help in-person or telephonic interpretations as needed.
- c. **Grow in-person interpretation services.** The Controller's Office of Immigrant Affairs can offer in-person interpretation for scheduled meetings and events as needed. COIA will inform the public about these resources through our website and newsletters.

B. TRANSLATION

Currently there are no documents translated as our office has as of yet has the request, however should the need arise. Our committee consists of persons from Latin, African, Indian, Russian descent who will be available to offer translation services.

The information on our website is not translated, in our future goals we plan to offer translation services as requested.

All signs are currently in English, our office welcomes the public for meetings etc., and however is not a public service office.

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**- Vital written documents include, but are not limited to: notices advising LEP individuals of free language assistance services.

3.) Procedures

a.) To submit a request, all persons will call our main number; receptionist will take the information and forward it to the appropriate personnel for translation.

b.) In-Person Interpretation requests will be handled by available staff.

1.) Current Staff

This list identifies the languages spoken by **(Controller's Office)** staff that are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.

- Arabic
- Cantonese
- French
- Greek
- Hindi
- Italian
- Korean
- Russian
- Spanish

2.) Future Plans

a.) Hiring.

The Controller's Office does not have significant customer service/public contact. We plan to develop in-house language capacity through regular hiring of employees with specific language skills. We will comply with Civil Service Commission Regulation 11/032- SELECTIVE FACTOR CERTIFICATION regarding the hiring needs for bilingual staff.

b.) Staff interpreters

We will utilize current staff members to function as interpreters.
Should it become necessary we will have staff go through formal interpretation training.

c.) The Controller's Office will consider options available to assign or configure employees in order to best communicate with LEP individuals serviced by or in contact with the department without imposing unfair burdens on bilingual staff.

1.) Training Protocol:

- a. The Controller's Office Language Access Plan and Protocol will including in our Policy and Procedures manual with can be found on our Local Area Network (LAN) available to all employees, and provided a hard copy to all Controller's Office staff members at hiring.
- b. All Controllers' staff providing assistance, training or receiving in-bound calls will receive annual LEP updates and necessary training if applicable.
- c. LEP training will include information on the following topics:
 - a. Legal obligation to provide language assistance
 - b. Obtaining interpreters
 - c. Translation procedures
 - d. Documenting language requests
 - e. Identifying and responding appropriately to LEP individuals
- d. The Controller's Office will circulate this language access policy and related protocols to all staff within 10 days after adoption. Every two years, the Controller's Office will circulate the revised policy and protocols to all staff after adoption. Within nine month of the adoption of this policy, the Controller's Office 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 the Controller's Office. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.
- e. 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 Controller's Office'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 with LEP individuals, to ensure that they fully understand the policy, plan, and protocols so they can reinforce their importance and ensure implementation.
- f. Orientation – New staff training will be provided on the Controller's Office Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

2.) Future Plans

The Controller's Office future goal is to update and freshen our office'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.

E. ADMINISTRATIVE HEARINGS

1.) Protocol

- a. Once a request for an interpreter has been made, a formal request for an in-person interpreter will be to Language Services Associates of the Controller's Office. If an in-person interpreter is not available, a telephonic interpreter will be provided.
- b. The Controller's Office will provide a trained legal interpreter for any hearing that an LEP individual requests language assistance with three business days' notice should a hearing be deemed necessary.

2.) Future Plans

- a. An effort will be made to provide simultaneous interpretation over consecutive interpretation.
- b. A protocol will be put in place that will identify whether a resident is LEP prior to the hearing in order to plan accordingly for an interpreter.

6. NOTICE OF THE RIGHT TO LANGUAGE ACCESS

In all areas of public contact and on its website, the Controller's Office 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

The following information will be required to be monitored and collected by units in the Controller's Office and will be collected via quarterly reports by the COIA:

- 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 quarterly on the following:

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

- 1.) The Controller's Office Immigrant Affairs Committee 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/or 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 procedure, how to carry them out, and whether language assistance resources and arrangement 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.) The Controller's Office Immigrant Affairs Committee 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. Controller's Immigrant Affairs Committee 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.

- 3.) Evaluation results and recommended changes will be shared by Controller's Office Language Access Coordinator 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, the Controller's Immigrant Affairs Committee 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 Controller's Office Immigrant Affairs Coordinator 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 Complaint Form and submit the form in person, by mail or email to:

Controller's Office of Immigrant Affairs
Andrea Rose
Immigrant Affairs Coordinator
1401 John F. Kennedy Boulevard, 12th Floor
Municipal Services Building
Philadelphia, PA 19102
Email: andrea.rose@phila.gov

The form will also be available on the Controller's Office website once it is created.

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 Controller's Language Access Coordinator will form a committee/staff to implement the plan, objectives and services.
- The Language Access Committee will meet to discuss the plan, brainstorm ideas for language access resources.
- The committee will share the information with all staff members and be available to upper management for questions/approval of the plan

2017

- Ensure Language Access plan is available on Local Area Network electronically and hard copy.
- The committee will continue to communicate with frontline staff to discuss language access and any emerging needs/challenges
- The committee will work with other groups to coordinate plain language and /or cultural competency trainings.

10. SIGNATURE PAGE



Language Access Coordinator
Title
(Office of the City Controller)



^{1st}
Deputy, Bill Rubin

Commissioner
(Office of the City Controller)