

## **Philadelphia Streets Department: Language Access Plan**

### **1. Purpose:**

In Cooperation with the Mayor's Office, the Philadelphia Streets Department 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 Philadelphia Streets Department 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 provide clean, green, and safe streets in a cost-effective and efficient manner. The department delivers a number of City services that are critical to maintaining the public health and safety in our communities. These essential services include, but are not limited to, curbside trash and recycling collection, maintaining all traffic control devices and street lighting, the construction and maintenance of 320 bridges and 2,525 miles of streets and highways and snow and ice removal.

### **2. Policy:**

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

C. The department, rather than the LEP customer, bears the responsibility for providing language appropriate services. Staff at the initial point of contact has a specific duty to identify and record language needs. Use of informal interpreters such as family, friends of the person seeking service, or other customer 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 Service

- 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 service even when staff with bilingual abilities are available.
- Staff will be authorized to provide language services to communicate effectively even when such assistance is not requested by the customer.
- 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.

### **3. Language Access Coordinator**

The Streets Department has appointed a Language Access Coordinator to implement and monitor its language access services. The representative serves as a liaison between the Department and the Office of Immigrant Affairs to communicate with LEP communities through established organizations.

Language Access Coordinator  
Keisha McCarty-Skelton  
Public Affairs Officer  
Keisha.McCarty@phila.gov

### **4. Direct Contact with LEP Individuals**

The Streets Department has identified the following areas as primary points of contact with the public and areas of service provision in which contact with LEP individuals is most likely. The department has determined the following means of providing interpretation and translation services, if needed, in connection with these functions:

- Reception Areas: Telephonic interpretation and Display Charts
- Customer Service Counters: Telephonic interpretation and Display Charts
- Field: Telephonic interpretation and Display Charts

The Language Access Coordinator will work with department managers to help identify Streets Department employees that are in contact with residents that may require language access services.

### **5. Language Access Plan and Protocols**

In order to ensure that the Streets Department's personnel can communicate effectively with LEP individuals and provide meaningful access to services, the following language access services will be used:

### **Telephonic Interpretation Services**

The Streets Department uses the contracted, telephonic interpretation service, Language Line. This service allows its department employees to access an off-site interpreter by dialing the language line number and using an access code and password.

Employees at the Streets Department's Visitor Front Desk, Customer Affairs Unit and the Permit Services counters will use telephonic interpretation services as needed. These are employees who interact with citizens solely by phone and who have direct personal contact with constituents.

When a customer calls the Streets Department's service lines and it is determined that the caller is LEP, the call taker will transfer the caller to Language Line. Language Line personnel will determine the language of the LEP caller and interpret the information from the Streets Department's call taker.

The Streets Department Sanitation and Transportation field employees will be provided access to LanguageLine via cell phones. The Language Access Coordinator will obtain tip cards for field staff to access off-site interpreter services and will help designate field and office employees for training.

Telephonic interpretation is available by calling LanguageLine at the following number: 1-800-874-9426 and entering access code 507992.

This service is available 24/7. An operator will ask for the language that you need interpretation for.

### **Document Translation Services**

The Streets Department documents are vital tools for the efficient delivery of service and allow the Department to educate customers about its regulations and citizen responsibilities as they relate to these regulations. The Department shall, through its contracted vendor, provide translations of vital departmental literature and forms.

In an effort to provide written translation of vital documents to LEP constituents the Streets Department in the past has acted to have these key documents translated in two languages, Spanish and Chinese. These two languages were chosen after a survey was taken among departmental employees who frequently interact with the public as to which key LEP constituents they have the most interaction.

Changes in departmental services and regulations require these documents be updated. Updates to documents already translated will be provided to the vendor for further translation.

The Language Access Coordinator will work with the Department's managers to get the top three public facing documents of each division to be translated into Spanish and Chinese.

The Coordinator will periodically review the translated documents and identify any additional documents to be translated on an as-needed basis.

Procedure for Submitting a document for translation:

Email the editable document to the language access coordinator or division manager  
The Committee will submit the translation request to the OIA  
The OIA will submit translation to vendor to obtain a quote  
The Office of Immigrant Affairs will email the requestor with a quote for approval  
Quote must be authorized by the language access coordinator or division manager  
Quote is then signed and emailed back to Office of Immigrant Affairs  
Office of Immigrant Affairs will email the translated documents once completed

NOTE: Before submitting a document for translation, staff will review documents 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 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.

To date, the Streets Department has translated several public assistance and service-related materials including:

SWEEP and Trash Guidelines brochure  
PMBC – “Do You Want To Live On A Clean Block”  
PMBC Cleaning Schedule  
Traffic Engineering  
Dumpster Laws  
Good Neighbor Booklets

Additional documents to be requested for translation include:

The Hole Truth  
Alleys, Driveways and Retaining Walls  
Block Party brochure  
Block Party application  
Application for Street Closure

See the Translated Documents spreadsheet for a list of the Streets Department documents/forms that have been translated into other languages.

### **Website**

The Streets Department website is currently available in English. We will make translated documents available on our website.

### **Bilingual Staff**

This list identifies the languages spoken by Streets Department staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to

serve as interpreters. Please see the snapshot below of languages and number of employees that speak that language in our department (self-reported):

Arabic	9
French	8
Hindi	7
Punjabi	1
Urdu	5
Malayalam	8
Cantonese	1
Mandarin	4
Creole	2
Haitian Creole	1
German	6
Greek	2
Patoise	2
Gujarati	3
Finnish	1
Italian	3
Thai	1
Amharik	1
Bengali	1
Korean	1
Romanian	1
Myanmar	1
Russian	2

Uzbek	1
Spanish	28
Tagalog	2
Pampango	1
Yoruba	1
Gbandi	1

**Training on Policy, Plans and Protocols**

The primary purpose of the training will be to ensure all employees are familiar with the plan, how it is to be utilized and what resources are available to them when assisting LEP customers. We will work with the Office of Immigrant Affairs and vendors to schedule future trainings for our staff that interact with LEP populations in early 2017.

**6. Notice of Right To Language Access**

A necessary component in addressing LEP customer needs is to communicate the existence of language access services and provide readily available directions on how to access these services.

The Streets Department will generate awareness of its language access services on its external website(s) and all public outreach material.

Multilingual signage shall be posted in public contact areas advising LEP customers that language access services are available. The signage will be provided by the City’s Language Access Coordinator to be posted in key service areas (Permit Services counters, Visitor’s Front Desk, Field offices).

Written notice, provided in English and most common languages identified by staff, will be posted at work locations that have public access where interpretation services will be available. Such notice will also be posted on the department’s website and literature.

The Language Access Policy will be posted on the Streets Department’s internal employee intranet website so that employees are aware of the policy and understand how to obtain language access services as part of their work protocol.

**7. Data Collection and Annual Reporting:**

The LAP coordinator will work directly with divisional representatives who manage functions that interact with the public and other stakeholders to determine the level of access for various constituent groups. The coordinator will also collect data and information on the following

- (1) Number of LEP encounters
- (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

The Streets Department 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. 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.

Evaluation results and recommended changes will be shared by the Streets Department's 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 the past, to assist LEP constituents, the Department has relied solely on the language abilities of its own staff. Translations of documents were completed through an outside vendor.

Staff in the functional areas identified previously are directed to keep a log of the interaction with LEP constituents and the services they request. Each unit will be responsible for submitting a monthly log to the Language Access Coordinator.

The Language Access Coordinator will monitor, track and review all documents submitted by staff to determine the most common services requested by LEP constituents and if the Department's plan should be modified.

This language access plan shall be evaluated and revised, if needed, every two years. The language access coordinator shall be responsible for the evaluation and revision of the plan.

This data will be collected quarterly and reported annually to the Office of Immigrant Affairs. This data will also be cross referenced with city maps that identify cultural and ethnic communities and populations for further LAP use detail.

## **8. Language Access Complaint Process**

You may file a formal 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. 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  
1401 JFK Blvd., Suite 1430,  
Philadelphia, PA 19102  
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

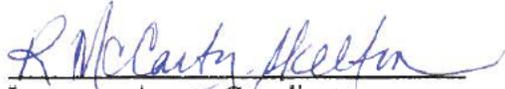
To access the form and for more information, please visit [www.phila.gov/humanrelations](http://www.phila.gov/humanrelations)

## **9. Implementation Timeline**

An implementation timeline will be enacted as each division and unit completes training. The Department will develop and distribute a formal policy statement that codifies the plan to implement language access services. The policy will include:

- program goals and guiding principles
- responsible parties for implementation and oversight
- methods for notifying constituents of language access services
- protocols for employees to follow when providing language access services
- training requirements

10. SIGNATURE PAGE

A handwritten signature in blue ink, reading "Keisha McCarty-Skelton", written over a horizontal line.

Language Access Coordinator  
Keisha McCarty-Skelton  
Streets Department

A handwritten signature in blue ink, reading "Carlton Williams", written over a horizontal line.

Commissioner

Carlton Williams  
Streets Department