



## **LANGUAGE ACCESS PLAN AND PROTOCOL**

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## I. PURPOSE AND AUTHORITY

- A. In cooperation with the Mayor's Office, the City Council of Philadelphia 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 City Council personnel to follow when providing services to, or interacting with, individuals who have LEP.
- C. Following this plan and protocol is essential to the success of our mission to facilitate public access to the legislative and budget processes, and to provide superior constituent services.

## II. GENERAL PURPOSE

- A. City Council recognizes that the population eligible for services includes individuals who are limited in their English proficiency. It is the policy of City Council to ensure meaningful access to LEP individuals, therefore the following policy is being adopted to ensure that LEP individuals can gain equal access City Council's services and communicate effectively with Council's members and staff. This plan applies to all City Council offices and satellite offices.
- B. It is City Council'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. City Council intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. City Council also seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.
- C. In this regard City Council will endeavor to facilitate LEP persons through:
  - 1. Training staff at the initial point of contact to identify language needs.
  - 2. Utilizing competent bilingual staff able to provide services directly to the constituents in their primary language without the need for an outside interpreter.
  - 3. In the absence of such staff utilizing professional in-person or telephonic interpreters.

### III. LANGUAGE ACCESS COORDINATOR

**City Council Language Access Coordinator**

Mary Ellen Milovsky and Linda Rios Neuby

Language Access Program Managers

Office of the City Council President

City Hall, Room 494

Direct: (215) 686-2168 or (215)-686-3405

[Mary.ellen.milovsky@phila.gov](mailto:Mary.ellen.milovsky@phila.gov) or [linda.rios@phila.gov](mailto:linda.rios@phila.gov)

### IV. DIRECT CONTACT WITH LEP INDIVIDUALS

City Council has several points of contact with the public including:

**A. Direct communication with constituents**

- Office walk-ins
- Scheduled in-person meetings
- Phone calls (incoming and outgoing)
- Letters and emails
- Website and Social Media

**B. Mass communication with constituents**

- Community meetings and town halls
- Mass mailings
- Flyers
- Press releases

**C. City Council functions**

- City Council Hearings
- City Council Sessions

## V. 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, City Council will provide an interpreter, at no cost to the resident, for LEP individuals. Services offered include or in-person or telephonic interpretation.

#### 2. Procedure

When it is determined that a constituent is an LEP individual employees shall determine whether bi-lingual staff in the office is available who speaks the language being requested.

If bilingual staff is not available, the employee shall contact Council's Language Access Coordinator who will contact an interpreter service in this regard:

When an LEP person requests interpretation for a meeting in advance of the meeting, telephonic or in-person interpretation may be used, the process for requesting interpretation in advance is below:

##### a. In-Person Interpretation

The Language Access Coordinator will contact GLOBO. Although the service is available 24/7, it is recommended that providing 72 hours advanced notice whenever possible, if not more.

Cancelation of In-Person Interpreter - if it is determined that an in-person interpreter is no longer needed offices should inform the Language Access Coordinator a full business day in advance of the scheduled time (if possible).

##### b. Telephonic Interpretation

City Council makes telephonic interpretation services available in its main office through GLOBO. 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 its staff on using telephonic interpretation services.

The City Council can offer in-person interpretation for scheduled meetings and events as needed through GLOBO if given enough notice.

City Council will continue to inform the public about these resources through social media, visible multilingual signs and will train all its staff on requesting in-person interpretation services.

## **B. Translation**

### **1. City Council upon request provide the following translated documents:**

- Bills
- Resolutions
- Press Releases
- Hearing Testimony
- Information Packets

### **2. Procedure For Submitting a Document for Translation**

- Email the editable document to Council's Language Access Coordinator.
- The LAC will submit the translation request to OIA/translation vendor to obtain a quote.
- The LAC will email you a quote with a time estimate for delivery of the translation.
- Quote must be authorized by person with authority.
- Quote is then signed and emailed back to OIA.
- The LAC will email you the translated documents.

Before submitting a document for translation, offices must 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 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.

### C. Bilingual Staff

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

[Allan Domb](#)

German  
Italian

[Derek Green](#)

Sign Language

[Helen Gym](#)

Chinese  
Creole & French

[David Oh-](#)

Spanish  
Korean

[Blondell Reynolds Brown-](#)

French

[Al Taubenberger](#)

German  
Hindi, Malayalam, Tamil

[Mark Squilla](#)

Spanish & Italian

[Kenyatta Johnson-](#)

Spanish

[Jannie Blackwell-](#)

Spanish

[Darrell Clarke-](#)

Spanish

[Maria Quinones Sanchez-](#)

Spanish

[Cherelle Parker](#)

French

**VI. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOL**

Training will be provided on the City Council's Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

- A. City Council's Language Access Plan & Protocol is part of the staff handbook, posted on the intranet, and provided as a hard copy to all City Council staff members at hiring.
- B. City Council 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.

**VII. NOTICE TO PUBLIC OF AVAILABILITY OF LEP ASSISTANCE**

- A. 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.' - and will be in English as well as the principle languages spoken in the service area.
- B. Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.
- C. Tag lines will be included in or attached to a document when helpful. 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.
- D. Staff 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 in (language).'

**VIII. DATA COLLECTION AND ANNUAL REPORT**

**Data Collection**

The following information will be monitored and collected and submitted 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 report quarterly on the following:

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

## **IX. LANGUAGE ACCESS COMPLAINT PROCEDURE**

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  
Municipal Services Building  
1401 JFK Blvd., 14th Floor, Suite 1430  
Philadelphia, PA 19102  
E-Mail: [orlando.almonte@phila.gov](mailto:orlando.almonte@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 contact:

Philadelphia Commission on Human Relations  
The Curtis Center  
601 Walnut Street., Suite 300 South  
Philadelphia, PA 19106

For more information, please visit [www.phila.gov/humanrelations](http://www.phila.gov/humanrelations)

X. SIGNATURE PAGE



CITY COUNCIL  
WILLIAM A. CARTER IV, ESQ.



CITY COUNCIL  
MARY ELLEN MILOVSKY  
LANGUAGE ACCESS COORDINATOR



CITY COUNCIL  
LINDA RIOS NEUBY  
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