



# Philadelphia Commission on Human Relations Philadelphia Fair Housing Commission

## Language Access Plan

(Updated 2025)

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## 1. PURPOSE AND AUTHORITY

In cooperation with the Mayor’s Office, the Philadelphia Commission on Human Relations (PCHR) and the Fair Housing Commission (FHC) are committed to compliance with Title VI of the Civil Rights Act of 1964, 2 C.S. § 561 et seq. (Act 172 of 2006) the Philadelphia Home Rule Charter § 8-600 and § A-200, Executive Order 7-16 and revised and updated Managing Director Directive 62, in ensuring meaningful access to City services and programs for individuals with Limited English Proficiency (“LEP”).

This document aims to establish an effective plan and protocol for PCHR and FHC personnel to follow when providing services to, or interacting with, individuals with limited English proficiency (LEP). Following this plan and protocol is essential to the success of our mission to serve the greater Philadelphia region by enforcing the laws set to prevent discrimination and promote equity in Philadelphia.

PCHR and FHC recognize the importance of effective and accurate communication between employees and the communities served and will accomplish language access goals through services provided by City-contracted language access vendors for telephonic, in-person interpretation, and document translation.

PCHR and FHC will continually work with community stakeholders to evaluate its services and identify ways to refine and/or expand them. As a result, we expect the strategies, services, and programs will evolve.

## 2. GENERAL POLICY

### A. Eligibility

PCHR and FHC recognize that Philadelphia residents and visitors are eligible for City services including anyone with limited English proficiency. The City’s policy grants every person access to services or programs even when the person has a limited ability to speak, understand, read, or write English. Therefore, access to services and programs is free to anyone.

### B. Core responsibility

PCHR and FHC seek to reduce barriers by increasing the capacity to deliver services and benefits to people in their primary language. PCHR and FHC, rather than the LEP customer, have the following obligations:

- To provide language-appropriate services.
- To identify and record language needs by staff at the initial point of contact.
- To avoid using informal interpreters such as family, friends of the person seeking service, or other customers.
- To prohibit the act of using minor children as interpreters.
- Not to suggest or require that an LEP customer provide an interpreter to receive services.

#### C. Method of service

- Staff should seek professional in-person or telephonic interpreters and translation service assistance 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.
- Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.

### 3. LANGUAGE ACCESS COORDINATOR

The appointed Language Access Coordinator is tasked to implement and monitor the language access services. The representative is the liaison between PCHR and FHC and LEP communities.

#### **Language Access Coordinator**

**Satteria Kersey**

Public Information Officer

Commission on Human Relations

Fair Housing Commission

### 4. ENGAGEMENT

PCHR has several points of contact with the public:

- Office walk-ins** – Visitors occasionally seek services in person. If no bilingual staff is available, telephonic interpretation is used. Staff identifies the language using:
  1. “How Can We Help You?” poster and cards
  2. “Point to Your Language” poster and cards
- Office calls** – During business hours, callers seeking assistance are served using telephonic interpretation if no bilingual staff is present.
- Correspondence via email and letters** –
  - Responses to non-English messages follow the same protocol as emails and letters:
    - If under one paragraph, bilingual staff assists
    - If over one paragraph or if language not covered by bilingual staff, trained translators are engaged

**D. Correspondence via social media –**

1. For correspondence in other languages
  - i. If under one paragraph, bilingual staff assists
  - ii. If over one paragraph or if language not covered by bilingual staff, trained translators are engaged

**E. Hearings** – For in-person or virtual hearings, PCHR and FHC will provide in-person interpretation when language services are requested or anticipated.

**F. Meetings/Training** - PCHR and FHC arrange in-person interpretation for meetings or training sessions where language access services are anticipated.

## 5. LANGUAGE ACCESS SERVICES AND PROTOCOLS

### A. Interpretation

Interpretation is a real-time *spoken (or signed)* service. Interpretation services offered include:

1. In-person interpretation
2. Telephonic interpretation
3. Video interpretation (i.e. Zoom, Microsoft Teams)

### Protocols

PCHR and FHC will provide an interpreter, at no cost, under the following procedures:

1. An individual seeks assistance but has difficulty communicating their needs.
2. A request for an interpreter has been made, either
  - a. Orally
  - b. Written
  - c. By pointing to a language card

### Procedures

1. Telephone interpretation
  - a. Over-the-phone interpreters can be accessed by calling the following vendor: United Language Group (ULG). This service is available 24/7.
    - i. To submit a request, call 1-800-xxx-xxxx and provide the following information when greeted by a coordinator:
      1. Provide language needed
      2. Provide payroll number

## 2. In-Person Interpretation

a. Requests may be made at any time (i.e. "24/7") but, when possible, should be submitted at least two weeks in advance by emailing the Language Access Coordinator at [Saterria.Kersey@phila.gov](mailto:Saterria.Kersey@phila.gov).

i. The Language Access Coordinator can also submit a request online, at: [www.nscphila.org/language-access-services/request-services](http://www.nscphila.org/language-access-services/request-services)

## 3. Video Interpretation

a. Requests may be made at any time (i.e. "24/7") but, when possible, should be submitted at least two weeks in advance of need by emailing the Language Access Coordinator at [Saterria.Kersey@phila.gov](mailto:Saterria.Kersey@phila.gov).

i. The Language Access Coordinator can also submit a request online, at: [www.nscphila.org/language-access-services/request-services](http://www.nscphila.org/language-access-services/request-services)

## 4. Cancellation of In-Person Interpreter

If the in-person interpreter is not needed, contact the vendor at least a full business day to cancel before the scheduled time, when possible.

### Future Plans

1. Use telephonic interpretation and ensure that the public knows about the availability of these services. Telephonic interpretation services are available through ULG. The telephonic interpretation service is available in over 170 languages. The office will continue to inform the public about these resources through social media, and visible multilingual signs. Office staff will be trained in telephonic interpretation services.
2. Grow in-person interpretation services. In-person interpretation for scheduled meetings is serviced through GLOBO. PCHR and FHC will continue to inform the public about these resources through social media, and visible multilingual signs. Office staff will be trained in how to request in-person interpretation services.

### B. Translation

Translation is the process of converting written text from one language to another. This service is free to the public. These services include translations of vital documents, signage, and key sections of our website.

### Protocols

Vital Documents - Vital written documents include but are not limited to: intake forms, public meeting notices, written notices of rights; and complaint forms. Vital documents will be translated into Spanish, Chinese (Simplified), and Khmer, as well as any specific language requested by the public.

Vital documents that have been translated include:

- Annual Report
- Good Neighbor Guide
- Fair Housing Guide
- Intake forms

#### **Procedures**

A. After notifying their supervisor of a translation need, staff should contact the Language Access Coordinator at [Satterria.Kersey@phila.gov](mailto:Satterria.Kersey@phila.gov)

- Have an editable document
- The Office of Immigrant Affairs (OIA) obtains a quote from translation vendors
- Quote must be approved
- Translation will be delivered by the vendor by the time estimated in the quote

#### **B. Public Procedure**

The public can request a PCHR or FHC vital document translation:

- Email a request to the Commission on Human Relations or Fair Housing Commission at [pchr@phila.gov](mailto:pchr@phila.gov)
- Identify the document requested and the requested language
- Agency staff will commission a translation from the translation vendor
- The final translation will be shared with the requestor and added to either the PCHR or FHC website.

#### **C. Signage**

OIA has provided signage alerting complainants that interpretation services are available.

- How Can We Help You?
- Language selection poster

#### **D. Website**

PCHR and FHC's websites contain information regarding laws, meetings, and forms. Currently, the following information and materials are available on the website in multiple languages:

- Good Neighbor Guide
- Fair Housing intake form
- Fair Housing pamphlet
- Lead Guide

## 5. BILINGUAL STAFF

The Language Access Coordinator will work with managers and staff to identify bilingual staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.

Language	Number of staff
Khmer	1
Mandarin	1
Spanish	6

## 6. FUTURE PLANS

Language Access Goals:

1. Develop a plan to continuously identify languages that are frequently requested by complainants/clients
2. Translate public materials extensively
3. Translation services are centralized through PCHR's Public Affairs Division to ensure that translations are clear and consistent.
4. Periodically review our websites to improve 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.
5. Develop a budget for translation services to encourage the broad translation of public materials.

## 7. TRAINING STAFF

### Training Protocol

All staff will receive language access training upon employment followed by refresher courses annually or as needed. Employees can contact the Language Access Coordinator for training requests.

LEP training will include information on the following topics:

- The federal, state, and local legal obligation to provide language assistance;
- LAP plan and protocols;
- How to work with interpreters
- How to request translation services

## Future Plans

PCHR and FHC will work to expand language access training to include:

- Understanding multilingual communities and identifying their needs
- Language mapping: using internal data for outreach to individuals with limited English proficiency or non-English language preference
- Require cultural competency training and training of the language access plan within 90 days of the date of hiring
- Further standardize language access resources and tools across PCHR and FHC

## 8. 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 our main office, which is primarily the area 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. Department notices and flyers will also provide notice of the availability of language services and simple instructions on how to request language assistance.
3. Taglines in multiple languages will be attached to English-language documents, explaining how individuals with limited English proficiency can access translations or an interpreter to read or clarify the document.
4. Clear, readable signs in the most prevalent languages in the City will be displayed in all public contact areas and on the websites, notifying LEP individuals about free translation and interpretation services.
5. OIA has provided signage alerting PCHR and FHC customers that interpretation services are available at customer contact locations.

## 9. 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 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 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. The Commission on Human Relations and Fair Housing Commission 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 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. Evaluation results and recommended changes will be shared by PCHR and FHC's Language Access Coordinator and incorporated into an annual report, which is required by 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 Office of Immigrant Affairs may use some of the following tools to conduct further assessment:
  - a. Request comments and feedback from visitors who have received language services.
  - b. Establish a tracking system to collect primary-language data for individuals that participate in programs and activities.

#### 10. LANGUAGE ACCESS COMPLAINT PROCESS

Customers may file a formal Language Access grievance with OIA if they believe they have been wrongly denied the benefits of this Language Access Plan. One must file their 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:

Office of Immigrant Affairs  
Deis Rodriguez  
Language Access Program Manager  
City Hall, Room 110  
Philadelphia, PA 19107  
E-Mail: [deis.rodriquez@phila.gov](mailto:deis.rodriquez@phila.gov)

This form is also available on the OIA's website at [www.phila.gov/programs/language-access-philly/language-access-grievance-form/](http://www.phila.gov/programs/language-access-philly/language-access-grievance-form/).

Additionally, any person, regardless of immigration status, may submit a formal legal complaint through the Philadelphia Commission on Human Relations. To do so, a Public Accommodations Discrimination Intake Form must be completed and submitted in person, by e-mail, or by mail to:

Philadelphia Commission on Human Relations  
The Curtis Center  
601 Walnut Street, Suite 300 South  
Philadelphia, PA 19106  
E-mail: [PCHR@phila.gov](mailto:PCHR@phila.gov)

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

## 11. TIMELINE FOR IMPLEMENTATION

### 2025

- Continue to broadly translate and interpret
- Update agency language access tools and resources
- Explore additional training opportunities
- Continue to utilize the services of Language Services Associates and Nationalities Services Center.
- Continue to broadly translate materials and provide on-site interpretation as needed, and to track these activities.
- The Language Access Coordinator will continue to communicate with frontline staff to discuss language access and any emerging needs/challenges.
- The Language Access Coordinator will update PCHR's internal protocols for written translations and in-person interpretations, respectively.
- The Language Access Coordinator will meet with front-line PCHR staff to discuss language access challenges, best practices, and methods for tracking language access data by program/site, and brainstorm ideas for new or updated language access resources these staff might need.
- PCHR will work closely with the Office of Immigrant Affairs and will communicate with other City agencies about best practices, tools that can be shared, and challenges.

Through December ~~2027~~

The Language Access Coordinator will update the Language Access Toolkit (a language access policy and training tool) and will distribute the updated toolkit to staff in the agency's public programs.

- The Language Access Coordinator will explore ways to track and certify PCHR staff who speak other languages and who are willing to help review translations and provide interpretation services; this will include updating the agency's internal Volunteer Language Database. The agency will evaluate alternative training and certification resources for these volunteers.
- The Publications and Language Access group will work with other groups in the agency to coordinate plain language and/or cultural competency training.

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12. SIGNATURE PAGE



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Randy Duque  
Acting Executive Director  
**Philadelphia Commission on Human Relations**

3/20/2025

Date



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Saterria Kersey  
Language Access Coordinator  
Public Information Officer  
**Philadelphia Commission on Human Relations**

3/20/2025

Date