



# Office of the City Controller Language Access Plan

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## SECTION I. – PURPOSE AND AUTHORITY

- A. The Office of the City Controller 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 the Office of the City Controller 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 promote the effective and efficient operation of Philadelphia government by identifying cost savings, recommending best practices and modernization, and exposing fraud and mismanagement.

## SECTION II. – GENERAL POLICY

As the independent financial watchdog for the City of Philadelphia, it is the mission of the City Controller to promote the effective and efficient operation of Philadelphia government by identifying cost savings, recommending best practices and modernization, and exposing fraud and mismanagement. The City Controller’s Office is an independent, elected office. The new administration was sworn in January 2018 and will focus on the following key areas:

- *Spending taxpayer dollars more efficiently and effectively, saving Philadelphia millions of dollars each year;*
- *Auditing every department every year with a focus on best practices and modernization;*
- *Investigating accusations of mismanagement and fraud by City agencies, employees and/or contractors;*
- *Increasing transparency of City government by releasing data on City spending to the public;*
- *Increasing diversity of the City’s workforce; and*
- *Researching key financial issues facing Philadelphia and taking policy positions to drive effectiveness.*

The Office of the City Controller recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the Office of the City Controller to ensure meaningful access to LEP individuals. The Office of the City Controller adopts the following policy to ensure that LEP individuals can gain equal access to the Office of the City Controller’s services and communicate effectively. This Plan applies to all of the City Controller offices and satellite offices.

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

The Office of the City Controller, and not the LEP Customer, bears the following responsibilities:

- Providing language appropriate services.
- Staff at the initial point of contact have the specific duty to identify and record language needs.

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, is the preferred method of serving LEP customers. Staff should use this method before others.
- 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.
- Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the customer. The Office of the City Controller recognizes that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available. (for example, situations concerning HIPAA, confidentiality or anything that may have a legal implication)
- The 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
- Minor children (under 18) are prohibited from acting as interpreters.

## SECTION III. – LANGUAGE ACCESS COORDINATOR

### **LANGUAGE ASSESS COORDINATOR**

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Rebecca Rhyhart  
City Controller

## SECTION IV. – DIRECT CONTACT WITH LEP INDIVIDUALS

The Office of the City Controller has several points of contact with the public. The following outlines how communications with LEP's must be handled at each point of contact:

### **A. Online Complaints**

The Office of the City Controller online web portal will be translated for LEP individuals to file complaints electronically. This translation will be done using Google Translate and will be available for our entire website.

### **B. Telephone Complaints**

The Office of the City Controller receives many telephone complaints, in these instances, if there is no bilingual staff available to interpret, staff will be directed to take the residence's information and call back at a time when an appropriate staff member or interpreter is available.

### **C. In-person Complaints**

Occasionally, in-person complaints are made. If the complainant is an LEP individual, and there is no bilingual staff to interpret, staff will use the forthcoming telephonic interpretation services.

### **D. Interview**

The office of the City Controller interviews individuals, both as witnesses and targets. If language needs are anticipated, the office of the City Controller will utilize in person interpretation in the appropriate language and schedule them as necessary.

## SECTION V. – LANGUAGE ACCESS SERVICES AND PROTOCOLS

### **INTERPRETATION**

Interpretation is the immediate oral rendering of the source language into the target language.

#### **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 in person interpretation and in the future will include telephonic interpretation.

#### **Protocols**

The Office of the City Controller will provide an interpreter at no cost to the LEP individual pursuant to the following procedures:

- An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or
- If 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.
- 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 by 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](http://www.nscphila.org/language-access-services/request-services)
- Fill out service request form and be sure to select interpretation
- Enter any interpretation appointment information available
- You will receive an email once an interpreter has been confirmed

**Cancelation 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.)

**Future Plans:**

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

The Office of the City Controller will make 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 all of its staff on using telephonic interpretation services.

If need increases for telephonic interpretation on the fraud hotline, processes for telephonic interpretation will be reviewed and updated.

**Grow in-person interpretation services.** The Office of the City Controller can offer in-person interpretation for scheduled meetings and events as needed through Nationalities Service Center if given enough notice. The Office of the City Controller will continue to inform the public about these resources through social media, visible multilingual signs and will train all of its staff on requesting in-person interpretation services.

**TRANSLATION**

Translation is the rendering of a written text from the source language into the target language.

**Services Provided**

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, The Office of the City Controller will continue to provide translations, at no cost, for LEP individuals. This includes translations of vital documents, signage and portions of our website.

**Translations Needed**

Documents:

- Office of the City Controller Mission Statement
- Contact Information
- Home Rule Charter and County Code Laws and Regulations regarding the City Controller
- End of Year Popular Audit
- Other Audits as Requested

Website:

The website will utilize Google Translate to translate the page to one of the more than 100 languages supported by the platform.

Additional translation efforts will be made for the following subpages of the website:

- |  |                              |
|--|------------------------------|
| • Office of the City Controller Mission Statement                                      | • Report Fraud               |
| • Contact Information  | • Request Data               |
| • Home Rule Charter and County Code Laws and Regulations regarding the City Controller | • Contact Us                 |
|  | • About Us                   |
|  | • Frequently Asked Questions |

### Vital documents

The large majority of documents generated by the Office of the City Controller our audits and special reports regarding different departments and protocols throughout city government. All of these reports and documents are uploaded to our website and made available to the public. The Office of the City Controller will review requests for the translation of vital documents to determine whether the request is appropriate, under the purview of the City Controller’s Office, and relevant to residents and will provide translation, in coordination with the Office of Immigrant Affairs, when appropriate.

### **Procedures for Submitting a Document for Translation**

- Email the editable document to the Office of the City Controller -Language Access Coordinator at Nicole.McCormac@phila.gov
- The Office of the City Controller will review the translation request to ensure that it is for a vital document relevant to residents and under the purview of the City Controller’s Office and will coordinate the approval of the request with the Office of Immigrant Affairs.
- If the translation request is approved, the Office of the City Controller will request the translation of the document from one of the vendors utilized by Office of Immigrant Affairs.

**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.

### Future Plans

The Office of the City Controller will determine how to best translate all of our offices audits and reports, after collecting data to illustrate the demand and need of translation for each audit or report based on topic.

## **C. BILINGUAL STAFF**

**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
- Spanish

**Future Plans** – Hiring decisions are based on the City Controller’ staffing needs as interpreted by unit heads, including language service needs. For outwardly facing jobs, such as investigator and community affairs, language needs will be addressed by including language skills as a preferred qualification in job and internship announcements. On an annual basis, the Office of the City Controller will assess whether new or revised functions might require bilingual staff in order to determine whether hiring practices need to be modified.

## **D. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS**

### **Training Protocol:**

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.

All Controllers’ staff providing assistance, training or receiving in-bound calls will receive annual LEP updates and necessary training if applicable.

LEP training will include information on the following topics:

- Legal obligation to provide language assistance
- Obtaining interpreters
- Translation procedures
- Documenting language requests
- Identifying and responding appropriately to LEP individuals

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.

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.

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.

**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**

**Protocol**

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.

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.

**Future Plans**

An effort will be made to provide simultaneous interpretation over consecutive interpretation.

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.

## SECTION VI. – 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.

## SECTION VII. – DATA COLLECTION AND ANNUAL REPORT

### Data Collection

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:

- Number of LEP Encounters (by language)
- Type of Language Services provided to LEP customers
- Number of documents translated
- Language Services expenditures

Additionally, Language Access Coordinators will be required to report quarterly on the following:

- Number of bilingual staff
- Number of staff trained in Language Access/Cultural Competency

### Annual Report/Evaluation

The Controller’s Office 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:

- Assessment of the use of telephonic interpretation, in-person interpretation and translation services.
- Assessment of data collected about the LEP’s primary language
- Assessment of the number and types of language requests during the past year.
- 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.
- Assessment of complaint information; and
- Assessment of soliciting feedback from LEP individuals and community groups.

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.

- If the individual is Limited English Proficient, the person’s language of choice will be noted for future visits.
- 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.

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:

- Request comments and feedback from visitors that have received language services
- Establish a tracking system to collect primary-language data for individuals that participate in programs and activities.

## SECTION VIII. – 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:

**Office of the City Controller**  
**Andrea Rose**  
**Immigrant Affairs Coordinator**  
**1401 John F. Kennedy Boulevard, 12th Floor**  
**Municipal Services Building**  
**Philadelphia, PA 19102**  
**Email: [andrea.rose@phila.gov](mailto:andrea.rose@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 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)**

## SECTION XIV. – SIGNATURE PAGE

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Office of the City Controller

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