

**CITY OF PHILADELPHIA, COMMERCE DEPARTMENT,
DIVISION OF AVIATION
LANGUAGE ACCESS PLAN & PROTOCOL**

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Limited English Proficiency Policy and Procedure

In Cooperation with the Mayor's Office, the City of Philadelphia, the Division of Aviation (DOA), which includes Philadelphia International Airport and Northeast Philadelphia Airport, 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 Limited English Proficiency ("LEP") individuals.

The purpose of this document is to establish an effective plan and protocol for DOA personnel to follow when providing services to, or interacting with, LEP individuals. Following this plan and protocol is essential to the success of our mission to proudly connect Philadelphia with the world while providing the highest levels of safety, security and customer service.

General Policy

The DOA recognizes that the population eligible for services includes LEP individuals. It is the DOA 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 DOA intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The DOA seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

The DOA, rather than the LEP individual, bears the following responsibilities:

- Provide language appropriate services
- Staff, at the initial point of contact, have the specific duty to identify and record language needs
- Use of interpreters such as family, friends of the person seeking service, is 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

The preferred method of serving LEP individuals is:

- Using competent bilingual staff to provide services directly to the customer in the primary language without the need for an interpreter service
- Available, trained, competent bilingual staff may be used for in-person or telephone interpreting.
- Using telephonic interpreters when bilingual 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.

Language Access Services and Protocols

DOA has services that are in place to provide language access to LEP individuals. These services are coordinated as detailed below.

Direct Contact with LEP Individuals from the Public:

The DOA has several points of contact with the public including but not limited to deplaning and enplaning, baggage claim, ticket counter check-in, and security checkpoints.

Guests with limited English, or employees and volunteers assisting guests, may obtain interpreters in three primary ways.

- Use the white Airport Information telephones located within all terminals to call the Communications Center.
- Contact a volunteer or employee at an Information Booth located in the terminals.
- Contact the language access coordinator.

Procedures

As part of their job functions, Communication Center and Information Booth staff and volunteers are trained on the LEP policies and procedure at onboarding. In this policy PHL staff and volunteers are referred to as “operators”.

When an LEP individual requires language assistance, the operator shall identify if a staff person is available who can assist based on the LEP individual’s language needs. If the bilingual staff is not available, the employee shall contact a telephone interpreter to provide interpreter services (see telephonic interpreter).

Telephonic Interpretation Procedure

If there are no available bilingual/multilingual staff to assist, a telephone interpreter is contacted to provide interpreter services.

The operator will follow these steps:

1. The operator receives a language interpretation request from LEP individual or from an Airport employee assisting a guest.
2. The operator determines the language needed.
3. If the request is received at Information Booth – Call Communication Center and transfer the individual. The Communication Center will complete the call.
4. The operator places the caller on hold and calls the telephonic interpreter (phone numbers for telephonic interpreters are provided to operators by the Language Access Coordinator).
5. The operator tells the representative the language needed.
6. The operator waits for the representative to conference in the interpreter.
7. The operator briefs the interpreter on the purpose of the call.
8. The operator conferences in the LEP individual or the Airport employee with the interpreter.

For in-person assistance, Airport employees would walk with the LEP individual to the Information Booth to access a telephonic interpreter with assistance of dual handset phones.

Translation

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, DOA will provide translations, at no cost, for LEP individuals. This includes signage, PHL website, and essential documents.

Non-English written correspondence, whether an inquiry, complaint, or compliment, shall be immediately referred to a DOA employee who speaks that language or to a translator for translation. All responses shall be written in the LEP correspondent's language.

Documents may be submitted online to feedback@phl.org

Throughout both domestic and international terminals, signage uses International Symbols to convey information. This includes and is not limited to baggage claim, ground transportation, bathrooms, information counters, and lactation areas.

Also, in the Customs area of International Arrivals terminal, "Welcome to Philadelphia" is displayed under the flag of 91 different nations, in the nation's principal language. There are 52 languages represented.

The PHL website (www.phl.org) contains information about the range of programs and activities at PHL. Currently, the website can be translated in more than 150 languages.

Interpretation

The DOA will provide an interpreter for LEP individuals, at no cost to the individual. Services offered include telephonic interpretation and in person interpretation. When 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 is available who speaks the language being requested.

Bilingual Staff

The DOA has in place bilingual staff who are competent to deliver services directly in a second language, or to serve as interpreters for other employees. This list identifies the languages spoken by staff within various units at PHL, who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters. Human Resources maintains the bilingual staff list and is responsible for yearly reporting.

Training Staff on Policy, Plan, and Protocols

Mandatory training will be required of all DOA staff who have the potential to interact or communicate with LEP individuals. This plan will be communicated to staff during the new hire or transfer appointment process, where applicable. All DOA employees will be notified in a timely manner when any changes are made to the LEP. Human Resources is responsible for training staff and reporting training. Human Resources will communicate updated policy changes.

Notice of the Right to Language Access

The DOA understands the importance of notifying LEP individuals that language assistance services are available and are free of charge. To provide notice to LEP Individuals about the Language Line, each public information services counter has a sign listing the most requested languages. The signs states that Interpretation Services are Available and instructs an individual to point to their language, at which point an interpreter will be called. The interpreter is of no cost to the individual seeking the service.

In all areas of public contact and on the PHL website, the DOA 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.

Data Collection and Annual Report

The DOA will continue to monitor our progress in meeting the LEP individual's needs.

The following information will be tracked and reported to the Language Access Coordinator from the responsible party by March 4.

- Number of LEP encounters (By Language) – Responsible: Communication Center, Information Booths and all others
- Type of Language Services Provided to LEP Customers -Responsible: Communication Center, Information Booths and all others
- Number of Documents Translated –Responsible: Communication Center
- Bilingual Staff – Responsible: Human Resources
- Language Access Expenditures – Responsible: Communication Center

The Language Access Coordinator will submit the annual reports to the City Language Access Program Manager to be submitted to the Department of Records for public access.

Language Access Complaint Procedure

An LEP individual may file a complaint with the DOA if they believe that their rights under Title VI have been violated

To file a complaint, contact Saron McKee within 14 days of the violation.

Saron McKee
215-863-2745
Saron.mckee@phl.org

Future Plans

- Human Resources will obtain language information during the new employee hiring process and update the language list.

- Human Resources will develop a train the trainer interpretation to train unit managers in highly visible, customer service positions.
- Human Resources will develop a formal interpretation training to applicable staff during the new hire orientation.
- Information counter signage notices will be updated.

Current Contracts

In Fiscal Year 2021, the City of Philadelphia has the following contracts:

- United Language Group- ULG, for all language access services, including telephonic interpretation, document translation, in-person interpretation, and video remote interpreting.
- GLOBO, for all language access services, including telephonic interpretation, document translation, in-person interpretation, and video remote interpreting.
- Powerling, for document translation
- LSA, for video remote interpreting
- NSC, for in-person and video remote interpretation

Language Access Coordinator or Committee

Language Access Coordinator:

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