

**CITY OF PHILADELPHIA, COMMERCE DEPARTMENT,
DIVISION OF AVIATION
LANGUAGE ACCESS PLAN & PROTOCOL
September 2016**

Purpose and Authority

In Cooperation with the Mayor’s Office, the City of Philadelphia, Division of Aviation (DOA), which includes Philadelphia International Airport and Philadelphia Northeast 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 offer premier air service while providing the highest levels of safety, security and customer service.¹

General Policy

The DOA recognizes that the population eligible for services includes LEP individuals. It is the policy of the DOA to ensure meaningful access to LEP individuals. The DOA adopts the following policy to ensure that LEP individuals can gain equal access to services and programs at Philadelphia International Airport (“PHL”)², and communicate effectively. This Plan applies to all DOA offices and satellite offices.

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 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.

I. Responsibility Statements

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

1. Provide language appropriate services
2. Staff at the initial point of contact have the specific duty to identify and record language needs
3. Use of informal interpreters such as family, friends of the person seeking service, or other customers must be discouraged
4. Minor children are prohibited from acting as interpreters
5. No staff may suggest or require that an LEP customer provide an interpreter in order to receive services

¹ Source: Getting Around PHL Guide

(<http://www.phl.org/Documents/Passengerinfo/Accessibility/ADAGettingAround.pdf#search=getting%20around%20PHL>)

²Philadelphia International Airport (PHL) shall include Philadelphia Northeast Airport when referenced in this Language Access Plan.

II. Preferred Method of Service

The preferred method of serving LEP individuals is by:

1. Using competent bilingual staff able to provide services directly to the customer in his/her primary language without the need for an interpreter.
2. Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.
3. Staff should seek assistance from professional in-person or telephone interpreters when staff cannot meet language needs.
4. Departments should recognize that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available (for example, situations concerning Health Insurance Portability and Accountability Act ("HIPAA"), confidentiality or anything that may have a legal implication). Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the customer.

Language Access Coordinator or Committee

Language Access Coordinator

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Language Access Coordinator

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Direct Contact with LEP Individuals

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. PHL has a language line in place that individuals may access through the white Airport Information telephones located within all terminals. Upon request, an operator from the Communication Center shall contact the Language Line service and connect the passenger with a qualified translator or interpreter (An in-house or contracted translator or interpreter who has demonstrated his or her competence to interpret or translate through court certification or is

authorized to do so by contract with the DOA.) The Language Line has more than 175 different languages available.

Staff and employees shall determine whether a passenger needs language assistance in several ways:

- Self-identification by the LEP individual or companion
- Inquiring as to the primary language of the LEP individual if he or she has self-identified as needing language assistance services;
- Asking multilingual staff or employees to verify the LEP individual's primary language

If the LEP individual is unable to identify his or her primary language, the staff member or employee shall call the Language Line and request an interpreter. Language Line staff shall then assist in identifying the LEP individual's primary language.

Language Access Services and Protocols

DOA has services that are in place to provide language access to LEP individuals. The DOA coordinates its Language Assistance Services through five (5) different units: Public Information Services³; the PHL Communication Center; the PHL ID Badging Office; the Passenger Assistance Staff; and the Language Line. The language assistance services that PHL provides include direct "in-language" communication, interpretation, and sight translation. Additionally, PHL's website, www.phl.org, can be translated in more than 150 languages.

I. Interpretation

a. Services Provided

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, the DOA will continue to provide an interpreter for LEP individuals, at no cost to the individual. Services offered include telephonic interpretation and in person interpretation, as outlined above under Direct Contact with LEP Individuals.

b. Protocols

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, the DOA will continue to provide an interpreter for LEP individuals, at no cost to the individual pursuant to the following procedures:

1. An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs; and/or

³ PHL Public Information Services are provided by an outside company under contract with the DOA. This contract is subject to change from time to time.

2. 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.

c. Procedures

If a DOA staff member determines that an LEP individual requires language assistance, the employee shall identify the proper staff 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 via the language line to provide interpreter services. As part of their job functions, staff are trained on how to contact Language Line Services during their on the job training process. The DOA has approximately 31 frequent languages that can be accessed through the Language Line.

The process to do so is as follows: The DOA staff member checks with the individual to see what assistance is needed, if any. Once identified that language assistance is needed, the staff person identifies the proper staff who can assist based on the LEP individual's needs. Once the staff is identified, then translation services are provided. If there are no available bilingual/multilingual staff to assist, a telephone interpreter via the language line is contacted to provide interpreter services.

Steps to follow:

1. The Communication Center operator receive a foreign language interpretation request directly from LEP individual or from an Airport employee.
2. The Communication Center operator determines the language needed.
3. The Communication Center operator places the caller on hold and calls the Language Line.
4. The Communication Center operator tells the Language Line representative the language needed.
5. The Language Line representative (also called Answer Point) asks the Communication operator to verify the six-digit client ID for the Airport as well as the Airport Personal Code.
6. The Language Line representative confirms the language needed.
7. The Communication Center operator waits for the Answer Point to conference in the interpreter.
8. The Communication Center operator briefs the interpreter on the purpose of the call.
9. The Communication Center operator conferences in the LEP individual or the Airport employee with the interpreter.

d. Future Plans

DOA will formalize the LAP procedures, and distribute to all DOA staff, develop a division-wide training plan for all staff including Interpreters/Translators, and develop unit specific training program for on-the job training for those work units with primary customer contact responsibilities including the Communication Center, Passenger Assistance, Security, Human Resources and Information Counters.

The DOA shall reevaluate PHL's LAP from time to time to consider whether changes are needed. This review shall solicit comments from DOA staff and ensure that identified language assistance services are still available and viable. More specifically, the DOA shall periodically in its reevaluation of the LAP review language access utilization data by frequency of encounters, type of language services provided and duration. The Language Access coordinator will submit quarterly reports on the number of bilingual staff by employment status and frequency of training provided in Language Access/Cultural Competency.

II. Translation

a. 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 year round translations, at no cost, for LEP individuals. This includes translations of signage and portions of our website.

b. Protocols for Document Translation

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 on the Language Line for translation. All responses shall be written in the LEP correspondent's language.

c. Procedures for Submitting a Document for Translation

Documents may be submitted online to feedback@phl.org; by fax at 215-937-6497; or by traditional mail to: Marketing and Public Affairs Dept., Philadelphia International Airport, Executive Offices- Terminal D/E, 3rd floor, Philadelphia 19153 Attn: Manager Mary Flannery.

d. Signage

Throughout both domestic and international terminals, signage uses traditionally accepted 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.

e. Website

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.

f. Future Plans

To provide notice to LEP Individuals about the Language Line, each public information services counter and passenger assistance counter maintains a sign listing the most commonly requested Language Line languages. The sign 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.

The Philadelphia Convention and Visitors Bureau Official Guides to Philadelphia are available at the Passenger Assistance Counter in Terminal A-East, PHL’s international terminals and online at www.discoverphl.com. The guides are available in multiple languages.

In all areas of public contact and on its 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.

Bilingual Staff

I. Current 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 list⁴ 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.

Spanish	French	Berber
Arabic	Ukrainian/Russian	Vietnamese
Portuguese	Albanian	Greek
Ewe	Kabye	Italian
German	Gaelic	Indonesian
Urdu	Korean	Swahili
Hindi	Hebrew	Chinese

⁴ As of August 10, 2016. This list is subject to change when DOA staff complement changes.

Shona	Sindebele	Sichangani
Xhosa	American Sign Language	Kru
Ethiopian	Liberian	Eritrea
Cantonese	Mandigo, Mane Olo	Alcoun (Ghana, Haua)
Ghanian TWI	Amhluil, Ouomi	Chewa
Kpelleh	Krio, Mende	Amhaie
Owi, Krume	Ndedele	Amaharic, Tigrina

II. Future Plans

a. Hiring/Selection

The DOA plans to build in-house language capacity by continuing to employ both temporary and permanent staff who can support our goal and mission to provide interpretation assistance to our customers in their primary language. If bilingual/multilingual skills are included in the job description, a candidate’s language proficiency will be assessed by the Office of Human Resources in accordance with existing Philadelphia Civil Service Regulations including but not limited to Section 11.032⁵. The assessment type will be determined by the Office of Human Resources, but may include formal testing of the candidate’s declared language, as well as a review of transcripts, diplomas or other evidence of language proficiency. It is the DOA’s goal to increase the number of languages available through in-person, e-mail and telephone contact using staff, contracted services, and other technology based equipment.

b. Staff Interpreters

DOA has full-time staff who speak more than 28 languages, and this increases to over 40 of the same when you include part-time employees. LEP individuals also have access to the language access services that provides over 175 languages. The DOA will continue to utilize these services, as well as increase the number of languages available for LEP individuals.

c. Language Sensitive Assignments

DOA considers the options available to assign employees in order to best communicate with LEP individuals served by or in contact with DOA without imposing unfair burdens on staff. However, with the large volume of customers traveling to or through PHL, it is a challenge to determine with any specificity when a particular language will be needed and when a staff person will be called on for assistance. Currently, the assistance is on a voluntary basis, and employees are eager to assist. The DOA assesses various units that have specific bilingual/multilingual business needs, and Human Resources staff fill temporary and permanent positions based on the operational needs. To fill permanent positions within specified language needs, requests are sent to the Office of Human Resources to use available bilingual lists.

⁵When a certification of eligible candidates with specified experience, education, training, license, registration, certification or skill is requested in writing by the appointing authority as being necessary for satisfactory performance in a particular position in an established class or series of classes, and the Director determines that the reasons given fully justify the request, a certification may be made of the two highest ranking eligible candidates on the appropriate list who possess the specified qualification. Selection of the eligible to fill the vacancy will then be made in accordance with the Civil Service Regulations.

Training Staff on Policy, Plan, and Protocols

I. Training Protocol

Mandatory training will be required of all DOA staff who have the potential to interact or communicate with LEP individuals, staff whose job is to arrange for language assistance services, and managers. 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 LAP. The DOA will develop a list of all bilingual/multilingual staff and as needed will use the list to assist the LEP individual.

II. Future Plans

- a. The Public Relations/Marketing unit will develop a Notice of the Right to Language Access brochure, which will be made available to LEP individuals seeking information on services upon request.
- b. The LAP will be communicated to all staff by December 1, 2016, and whenever updates are made.
- c. The Human Resources Staffing unit will obtain language information during the new employee hiring process and update the language list.
- d. The Human Resources Training unit will develop a train the trainer interpretation training for On the Job training sessions for unit managers in highly visible, customer oriented positions.
- e. The Human Resources Training unit will develop a formal interpretation training to all staff during the new hire orientation.
- f. On or before June 30, 2017, the DOA will have developed an administrative process that an LEP can use to file a complaint and request an administrative hearing with the Language Access Coordinator or designee within 14 days of any filed complaint.

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 and passenger assistance counter maintains a sign listing the most commonly-requested Language Line 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.

The Philadelphia Convention and Visitors Bureau Official Guides to Philadelphia are available at the Passenger Assistance Counter in Terminal A-East, PHL's international terminals and online at www.discoverphl.com. The guides are available in multiple languages.

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.

Language Access Complaint Procedure

I. Procedure

An LEP individual may file a complaint with the DOA if they believe that their rights under Title VI have been violated. Specifically, on www.phl.org, our Title VI Policy maintains the following:

“It is the policy of Philadelphia International Airport that no person shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination in the receipt of its services in accordance with Title VI of the Civil Rights Act of 1964. Upon request, Philadelphia International Airport will make available language assistance for individuals with Limited English Proficiency.”

<http://www.phl.org/Pages/AboutPHL/Title-VI.aspx>)

Included on the Title VI page is a link to the Title VI poster, as well as a link to the Complaint Form. This page, as with all pages on the website may be translated into over 150 different languages.

II. Future Plan

On or before June 30, 2017, the DOA will make readily available written complaint forms in the five most prevalent languages spoken in the city.

Timeline for Implementation

The DOA will have a fully completed LAP on or before June 30, 2017.

