

**Final Report to the William Penn Foundation  
From Community Legal Services, Inc.  
For Language Access Project  
Grant Period: March 16, 1999 to March 15, 2002  
Grant No. 8599**

---

On April 19, 1999, the William Penn Foundation awarded a three-year grant to Community Legal Services, Inc. (CLS) to improve and expand its work with limited English proficient (LEP) communities throughout Philadelphia. While the grant aimed to strengthen CLS' capacity for serving limited-English speakers on an organization-wide basis, particular emphasis was placed on assisting individuals in addressing the new challenges faced by welfare reform. The grant led to the creation of CLS' Language Access Project (LAP). This report describes activities and outcomes achieved during the third year of this grant. Since this report is the final one offered to the Foundation on this grant, we also offer some more general observations about the difference LAP has made to our work.

CLS has markedly improved and expanded its work with immigrants and other communities with limited English proficiency through a variety of strategies. These include the following:

- Placing more emphasis on hiring bilingual staff
- Contracting with professional language service providers
- Developing guidelines for more efficient use of in-house staff who are able to assist with interpreting and translation
- Training CLS staff in the use of interpreters
- Expanding targeted outreach by translating community educational and other materials
- Developing partnerships with community organizations
- Serving an increased number of individuals
- Providing training and designing a curriculum for mutual aid agencies serving immigrants and refugees on legal interpreting
- Engaging in more administrative and legislative advocacy to encourage government agencies to be more responsive to the needs of individuals who are disadvantaged due to lack of English skills.

In terms of results and measures, CLS met or exceeded all goals as set forth in our original grant proposal. With regard to expanding staff to increase services to LEP individuals, CLS met this goal in the first year and continued to hire in the second and third years of the grant.

Not only did CLS exceed its goal of increasing services to non-English speaking individuals by 50 percent in terms of numbers served, it did so in terms of the scope of services provided as well — i.e., more in-depth legal assistance and/or representation is now being provided rather than simply providing advice or making referrals.

With regard to the avoidance of sanctions and the maintenance of benefits for eligible public assistance recipients and the resolution of employment issues for indigent persons moving into work, it is important to note that CLS's leadership in welfare reform in general has contributed to the occurrence of very few sanctions in the Commonwealth. In terms of the target constituency of this grant, as is discussed in the *Advocacy* section beginning on page 15, the LAP has impacted the future of TANF for LEPs and has had similar measurable successes in Medical Assistance, food stamp access, Social Security, low-wage employment, unemployment compensation, consumer fraud, and court interpreting.

This report is divided into five sections. The first four sections describe the development of the LAP on various levels: internal; outreach to local communities; actual service provision to individual clients; and advocacy on behalf of clients with appropriate agencies. Finally, the future of the LAP is discussed. A number of exhibits are included in the report folder, starting with the Year Three Expenditure Report (Exhibit 1) and the Financial Statement (Exhibit 2).

## **I. INTERNAL CAPACITY-BUILDING**

### *Staff Hiring*

The implementation of LAP has convinced CLS of the importance of to hiring bilingual staff whenever possible to increase the program's in-house language capacity and build greater ties to language communities. In Year 3, CLS hired several employees with language skills.

Kim Mach, who is an ethnic Chinese from Vietnam who was raised in Philadelphia, was added to the Energy Project as a paralegal in the fall of 2001. She speaks Cantonese, and can communicate at a basic level in Mandarin and Vietnamese. Since no one else on the staff speaks any Cantonese or Mandarin, and her predecessor was monolingual, Kim's hiring increased our language capacity. Kim has also been involved with Asian community organizations and helps CLS build its ties in that area. She has already raised language issues with the Public Utility Commission, the Low Income Homeowners Emergency Assistance Program and Peco Energy.

Paula Ubiera was hired in April 2001 as a clerk and back up receptionist at the center city office to replace a bilingual Spanish clerk who had left CLS. Paula, who grew up in the Dominican Republic, helps makes it comfortable for Spanish speaking clients to initiate contact with CLS on the telephone or by walking in. In addition, she regularly serves as an interpreter for other staff, and has handled some translations of letters.

Dennisse Bones, also bilingual in Spanish and bi-cultural, was promoted from a secretarial position to a paralegal spot in the Elderly Law Project in March, 2001 to replace a departing bilingual paralegal. Dennisse's contribution to our outreach to Latino elders is detailed later in the report.

Evelyn Rosa was hired in June 2001 to replace Dennisse as a bilingual secretary at the North

Philadelphia office, which sees a high volume of Spanish speaking clients. Evelyn spent her early childhood in Puerto Rico, moving to Philadelphia with her family at age ten. She speaks Spanish fluently and has experience working with low-income Latino families. In addition to her invaluable secretarial assistance, Evelyn often interprets for staff and Spanish speaking clients. She also translates brief letters to clients and reviews for accuracy Spanish language translations performed by CLS' contracted services. Evelyn attended a forty hour training on interpreting.

Diana Espiñal was also hired in June 2001 as a bilingual receptionist/clerical worker for CLS' North Philadelphia office. Diana was born in the Dominican Republic and moved to the United States when she was nine years old. She is fluent in Spanish. In addition to working at the reception desk during intake hours, Diana frequently serves as an interpreter, assisting staff communicate with Spanish language clients. Diana also attended a forty hour training on interpreting.

Sofia Memon was hired in September 2001 as a public benefits attorney and has already made several important contributions to CLS' work with immigrant communities. Sofia, who is Pakistani-American, was raised in an immigrant family in the Philadelphia area and has worked on immigrants' rights issues both as an activist and as a legal advocate. She speaks Sindhi, a language prevalent in certain regions of Pakistan and India. Sofia has been working to build CLS networks in Philadelphia's South Asian and Muslim communities, with whom CLS traditionally has not been well connected. She serves on the Advisory Board of the Liberty Center for Survivors of Torture (described below), is a key member of the welfare unit's Title VI advocacy group, and has offered workshops for community organizations on immigrants' rights to public benefits.

Of the 12 new full-time staff hired during the year, five are bilingual, and three have limited to moderate second language skills in a total of six languages. CLS will continue to recognize the importance of multilingual staff in its hiring process, giving applicants extra consideration if they are bilingual.

#### *Board of Director Appointments*

One important goal of LAP has been to elevate the attention that CLS focuses on immigrants and people with limited English skills in a manner which is pervasive throughout the organization. Board composition was an area in need of improvement. The CLS Board has always been very diverse, including representatives of the poverty community as one third or more of its membership and generally having a majority of board members come from a minority background. However, few non-English speaking communities were represented on the CLS Board, and Hispanic membership was low if compared to the proportion of poor Hispanics in Philadelphia. An effort to address this was made and representation of LEP communities on the Board significantly changed during the grant period. LAP and other CLS staff recruited excellent and diverse Board candidates and, with the assistance of the Executive Director, persuaded the Board nominations committee to recommend and the Board and Bar Association to appoint some of those individuals to the Board.

John Kidane joined the Board in 2001. He is a prominent African community leader. He has served as acting director and is currently the director of refugee programs for the Nationalities Service Center, an important social and legal services organization which assists and organizes refugees and immigrants throughout the Greater Philadelphia area. John has worked for NSC for 19 years, having started his employment there within months of arriving in the US as a refugee from Eritrea. His personal experiences provide him with a deep understanding of the challenges facing immigrants and refugees, and a high level of legitimacy and standing among refugee communities. John speaks Amharic (Ethiopian), Tigrinya (Eritrean) and some Arabic, and has worked extensively with Ethiopians, Eritreans, Liberians, Sudanese, Somalis, South Africans, and Angolans in Philadelphia. Philadelphia is home to a rapidly growing number of African immigrants and refugees, and new waves of immigrants are expected to continue to arrive from Africa. John has already proved that he will be an important asset to CLS in its effort to better serve African communities.

Neeta Patel also joined the Board in 2001. She is a highly respected immigrant leader who directs Asian American United's South Philadelphia Family Center. Neeta, who is South Asian, previously worked for the Southeast Asian Mutual Assistance Associations Coalition (SEAMAAC), where she coordinated employment and training programs and helped form and facilitate the Refugee Community Coalition of Philadelphia -- a coalition of seven refugee organizations in Philadelphia who came together to advocate around immigrant issues. Neeta's work at AAU and SEAMAAC has familiarized her with the broadest range of Philadelphia's immigrant communities. She has helped give voice to immigrant concerns at Board meetings, and her participation on CLS' Board has facilitated a closer relationship between CLS and AAU, an important partner organization.

CLS has traditionally included representatives of the minority bar associations on its Board, and in 2002 Julie Lu of Duane Morris, LLP, the current president of the Asian American Bar Association of the Delaware Valley, joined our board. Ms. Lu, a Chinese-American, speaks Mandarin and is also a member of the Asian American Women's Coalition. Ms. Lu and the Asian American Bar Association are aware of LAP and support its mission. Arlene Rivera Finklestein has been appointed to the Board by the Hispanic Bar Association of Philadelphia. She is the President-Elect of that organization and a mentor for Latino American Law Students, and involved with the Police-Barrio Relations Project, bringing contacts with the Latino community to CLS.

In addition, Elvin Padilla, the Director of the Norris Square Civic Association's Mercado project serves on the Board. Norris Square Civic Association is a non-profit which serves a primarily Latino constituency, and which is very concerned with language access issues. El Mercado is a very successful community economic development venture which is establishing a food market in Norris Square which brings in products from farms in Puerto Rico and employs Philadelphia residents of the Norris Square area. Elvin is Puerto Rican by birth and brings familiarity with the Puerto Rican community of Philadelphia to the Board.

The CLS Board thought that two members of the Hispanic community on the Board did not constitute sufficient representation of that population and reached out to another Hispanic community leader, Stephanie Galindo, who also joined the board this year. She is the Director of

Staff and Organizational Development at Congreso de Latinos Unidos, the largest Hispanic community organization in Philadelphia which provides social services to tens of thousands of Hispanic Philadelphians, and will bring additional knowledge and contact with that community to CLS' planning and decision making.

### *Improving Use of In-house Staff as Interpreters*

Hiring bilingual staff allows the program to provide more services to clients directly in their own language. It also helps increase our internal capacity for interpreting. The hiring is only the first step in this process. In Year Three, we took the following steps to expand our interpreting ability:

- We created a CLS Staff Language Directory identifying the foreign languages spoken by staff-members and listing self-reported proficiency levels in verbal and written communications in those languages. CLS staff speak 11 different foreign languages at varying degrees of proficiency. This Directory better enables staff members to call upon colleagues in a pinch to assist in communications with LEP clients. It also includes information on accessing professional interpreting and translating services. A copy of the Directory is enclosed as Exhibit 3.
- Two new bilingual staff members were sent to a 40-hour, week long training on basic interpreting skills, giving them a foundation on the proper techniques to use when serving as an interpreter.
- We finalized management protocol regarding the use of Spanish- and Cambodian-speaking staff as interpreters. It explains who should be used and when in both offices and resolves staffing issues that arise in connection with the use of staff whose primary responsibilities are not interpreting.
- In April, 2002, we presented a two-hour training session for staff on how to work effectively with interpreters. A professional court interpreter was the featured guest. About 25 staff members attended.
- Our technical staff installed Microsoft Office for staff over a period of months. Staff who do translating were given a priority for the upgrade. The new Word program provides for the use of keyboards, grammar and spelling checks in a second language, which improves speed and accuracy on translations done in house.

### *Maintaining Contracts with Professional Interpretation/Translation Services*

Readily available, easily accessible language resources is a key to ensuring that LEP clients get the interpreting and translating services they need. During Year Three, CLS maintained its contracts with professional interpreting services. CLS continues to use Language Line services for phone

interpretation. Language Line offers phone interpretation in over 100 languages. We negotiated a new contract with Quantum, Inc. for in-person interpreters in languages other than Spanish and Khmer (for which we use in-house staff). Quantum is a language broker which offers interpreters in nearly 50 languages. Quantum also continues to serve as the primary source of written translations in languages other than Spanish and Khmer. During the past year, we began to utilize other sources for written translation. We have identified a number of qualified freelance translators. By eliminating the “middle-man,” we are sometimes able to obtain quicker and less expensive translations by working directly with freelance translators. We have also continued our contract with Silvia Lee for translation of complex or lengthy Spanish documents. Staff members continue to praise the availability of these services.

## **II. OUTREACH, TRAINING and COMMUNITY PARTNERSHIPS**

### *Elderly Law Project: A model of Effective Community Outreach and Partnership*

Outreach to and partnership with community organizations has proved key to CLS’ efforts to improve and expand its services to individuals with limited English proficiency. CLS’ Elderly Law Project (ELP) has served as a model in this regard. Funding from the William Penn Foundation and PEW Charitable Trusts enabled ELP’s small staff of two attorneys and two paralegals to make remarkable strides in its services to LEP communities, and its work deserves highlighting. ELP’s use of off-site intake at two senior centers serving predominantly LEP elderly has contributed significantly to the increased number of LEP clients served by CLS.

The Norris Square Senior Center is located in and serves a predominantly Spanish-speaking neighborhood of North Philadelphia. Dennisse Bones, an ELP paralegal promoted to the Project during Year Three, has held weekly office hours at the Center and has developed a strong relationship with the staff and members at Norris Square. Ms. Bones also received referrals from Projecto Ayuda (a senior employment program which serves Latinos), the Mann Older Adult Center and social services providers from throughout Philadelphia’s Latino community. From 2000-2001, the Project provided legal services to 144 Latinos, due in large part to the Norris Square initiative.

The “Coffee Cup” is a satellite site of the Philadelphia Senior Center. It is located in Chinatown and is frequented by elderly Asians. Since the summer of 1999, ELP has served nearly 50 senior citizens through holding office hours at the Coffee Cup. Collectively, these individuals speak six languages (Mandarin, Cantonese, Shanghainese, Fukienese, Vietnamese, and Laotian). The Philadelphia Senior Center has often provided staff to assist with interpreting. CLS has utilized its language resources, such as Language Line and Quantum, Inc. when needed. Many of the Coffee Cup clients have returned several times for assistance with their SSI benefits, Social Security benefits, senior employment program, food stamps, LIHEAP, and medical assistance. ELP also provided information about landlord-tenant issues and utility problems and have made referrals to legal services providers who specialize in immigration law.

ELP also has been actively involved in community education and outreach to the Latino and Asian communities. Example of these efforts have included:

- A community education presentation on medical insurance programs for approximately 110 Latino seniors at Projecto Ayuda, a senior employment program in the Latino community.
- Two presentations at “Homesmart” trainings, which covered an array of issues affecting homeowners, including tangled title, delinquent property taxes and Medicaid estate recovery. Both trainings were held at locations in or near the North Philadelphia Latino community and were attended by social service agency staff who work with this population, as well as elderly individuals.
- Participation in the first Asian and Latino Senior Community Health and Information Fair, providing information about the project’s services, the Medicare Buy-In and various other public benefit issues. Several hundred Latino and Asian seniors attended.

Finally, the ELP has translated its brochure, which details the legal services CLS provides to elderly persons and how to access them, into Spanish, Chinese, Vietnamese and Cambodian.

### *Solidifying Partnerships and Building New Relationships*

CLS more than met its measurable outcomes to establish partnerships with 18 non-profit organizations serving limited English proficient populations. Such partnerships have proven to be a critical element of CLS’ effort to improve its work with these communities. Through these relationships, we spread awareness of the availability of our services, partner in providing community educational workshops on legal topics, promote referrals of clients, and gain a better understanding of the legal needs and other issues facing immigrant and LEP communities. We have also found ourselves to be frequently providing brief advice to the organizations, consulting with them on legal issues which arise for their members or clients, suggesting an appropriate government agency to whom they can turn for assistance, and helping to facilitate referrals to other public interest legal organization on issues which fall outside CLS’ areas of expertise or focus.

During the past grant year, CLS continued to build relationships with 19 of the partner organizations identified in our previous reports:

Maria de los Santos Health Center  
Hall Mercer’s Southeast Asian Mental Health Program  
Nationalities Service Center  
Asian Americans United  
Kensington Welfare Rights Union  
Greater Philadelphia Overseas Chinese Association  
New World Association of Emigrants from Eastern Europe

Vietnamese United National Association of Greater Philadelphia  
Cambodian Association of Greater Philadelphia  
Philadelphia Corporation for the Aging / Asian Pacific Ethiopian Community Center  
Philadelphia Immigration Resource Center  
Southeast Regional Immigration and Citizenship Coalition (SERICC)

Senior Resource Center  
Congreso de Latinos Unidos  
Hebrew Immigrant Aid Society of Philadelphia (HIAS)  
National Consumer Law Center

Haitian Community Center  
Southeast Asian Mutual Assistance Associations  
Coalition (SEAMAAC)  
Health Promotion Council

In addition, CLS began the process of building partnerships with six additional organizations:

Catholic Social Services  
Lutheran Children and Family Services  
Peruvian Association

Coalition of African Communities  
Liberty Center for Survivors of Torture  
Committee to Save the Palelei Buddhist Temple

CLS looks forward to continuing our efforts to build new relationships with organizations which deepen our connections with immigrant and LEP communities.

*(Please see Attachment 13 for examples of Year Three Partnerships.)*

### *Trainings*

In Year Three, LAP significantly expanded the number and quality of trainings presented by its staff. The increase reflects the growing expertise of LAP staff in language rights issues and greater recognition by others of that expertise. Trainings conducted in Year Three include:

- ▶ We continued a series of legal interpreter trainings for staff at a number of refugee service agencies, in collaboration with the Health Promotion Council of Southeastern Pennsylvania. We further improved our existing training materials for the one and one half day curriculum and conducted trainings in November 2001 in Philadelphia and March 2002 in Harrisburg attended by approximately 50 staff. Two new CLS clerical staff attended the training in Philadelphia. We were assisted in the trainings by staff from HIAS and Council and the Pennsylvania Immigration Resource Center, as well as a professional court interpreter. During the course of the William Penn Foundation's grant, we have conducted six of these courses, providing intensive training on interpreting to over 130 refugee and immigrant service providers.
- ▶ In May 2001, we presented a workshop on "Language Access in Health and Welfare Settings" to elderly service providers attending a conference of the Center on Ethnic and Minority Aging outside of Philadelphia.
- ▶ LAP presented a training on two dates in October 2001 to staff at Philadelphia Legal Assistance, our sister agency, on Language Access Policy and Obtaining Language Services.
- ▶ In October 2001, we also presented a Continuing Legal Education training on "Language Access Rights under the Civil Rights Act of 1964" at the convention of the National Hispanic Bar Association.
- ▶ At the annual Pennsylvania Legal Services Statewide Training, LAP presented two

trainings to our legal services colleagues in Gettysburg. One session covered Providing Accessible Services to Limited English Proficient Clients. In preparation for this event, project staff wrote an original eight page reference memorandum called “Making Your Legal Services Program Accessible to Clients with Limited English Proficiency - An Approach.” (Exhibit 5) (We hope to submit the piece for publication in the Clearinghouse Review after additional editing.) Our second presentation at this conference, also held in October 2001, covered language access rights under Title VI.

- ▶ As an outgrowth of the joint work on immigrant consumer issues with the National Consumer Law Center, Paul Uyehara was invited by NCLC to present a training at that organization’s annual conference, held in October in Baltimore. He presented a training on “Overcoming Barriers in Serving Immigrants and Refugees” and was able to attend and participate in the conference as a guest of the Immigrant Justice in the Consumer Marketplace project of NCLC.

- ▶ In November, Paul Uyehara was an invited panelist for a workshop in Miami on “Strategies for Overcoming Language Barriers and Creating Access to Legal Services for Immigrant Clients” at the annual meeting of the National Legal Aid and Defender Association, attended largely by program directors from across the country. He was able to meet staff from some of the leading programs in the country in terms of language access, and to share our experiences in Philadelphia with programs that have not yet adopted language access policies.

- ▶ In January 2002, new paralegal, Kyle Fisher, presented a one-hour training to community based organization staff located at the Houston Center in South Philadelphia on TANF time limit issues. The center serves an area with a substantial population of Asian refugees as well as Mexican immigrants

- ▶ In March 2002, Jon Blazer offered a training on public benefits eligibility as part of a statewide conference entitled “Resources for Asylees in Pennsylvania.” The conference, sponsored by the Office of Refugee Resettlement and the Department of Public Welfare, brought together refugee resettlement providers, government officials, social service agencies, and individuals who had been granted political asylum. Jon also contributed a section of a manual on resources for asylees which will be distributed to refugee service providers across the state.

- ▶ Early in 2002, Employment Project attorney Suzanne Young conducted a training on basic employment law for youth leaders at Asian Americans United. The results of the training are detailed in the prior section on community partnerships.

- ▶ In March 2002, Nadia Hewka of the Employment Project conducted a workshop for immigrant advocates entitled, “Tax Issues for Immigrant Workers.” Topics covered at this training included an overview of the relationship between the IRS and the Immigration and Naturalization Service, a discussion of tax benefits for which documented and undocumented immigrants are eligible, an explanation of the Individual Taxpayer Identification Number which can be used by individuals who do not have Social Security Numbers when filing taxes, and a discussion of outreach challenges and strategies when doing outreach to immigrant communities and, in particular,

undocumented immigrants. Approximately 20 advocates who work with immigrants attended this two hour training.

- ▶ In March 2002, Sofia Memon of the public benefits unit presented a workshop on immigrants' eligibility for public benefits to members of a newly formed organization called the Peruvian Association.
- ▶ In April 2002, LAP presented a two hour training for CLS and PLA staff on Working with Interpreters. We were joined at the training by a professional court interpreter.
- ▶ LAP is scheduled to present a Continuing Legal Education training in June on improving the linguistic accessibility of legal services programs as part of Pennsylvania's annual CLE workshop for public interest lawyers.

LAP anticipates continued involvement in trainings of lawyers and advocates in the future as we develop further expertise and experience in language access policy, civil rights of language minorities and working with interpreters.

#### *Written Materials and Brochures*

During Year 3, LAP developed multilingual brochures that will provide basic information regarding CLS' services in twelve of the most prominent foreign languages spoken by Philadelphians eligible for our assistance. An Asian language brochure contains panels in Chinese, Korean, Cambodian, Vietnamese, Laotian, and Malayalam. An international brochure contains panels in Spanish, French, Arabic, Russian, and Haitian Creole. These brochures will significantly enhance our ability to perform outreach directly to LEP communities at venues such as community health fairs. We had previously worked with single-language flyers printed on standard paper. These flyers were difficult to keep organized and to distribute, and we only had translations in six languages. The new brochures also make clear that we provide language accessible services and that we assist people irrespective of their immigration status. A draft of one of the brochures is enclosed as Exhibit 6.

CLS worked with the Real Property Section of the Philadelphia Bar Association to translate landlord tenant brochures into Spanish, Chinese, and a Cyrillic language. These brochures provide information about the landlord/tenant relationship and gives readers suggestions that an individual should consider when entering into a landlord/tenant relationship, including the importance of a written lease.

In addition to translating brochures into a variety of languages, CLS has also made an effort to include multilingual "tag-lines" on its routine English language promotional materials. For example, the back of the folder in which this report was delivered contains the sentence "Free Legal Services to Philadelphia's Low-Income Communities" translated into six other languages, as does the CLS brochure enclosed as Exhibit 7. We believe that the presence of multilingual messages on our materials sends an important message, conveying our interest in communicating with a range of

language communities.

### **III. SERVICES TO INDIVIDUAL CLIENTS**

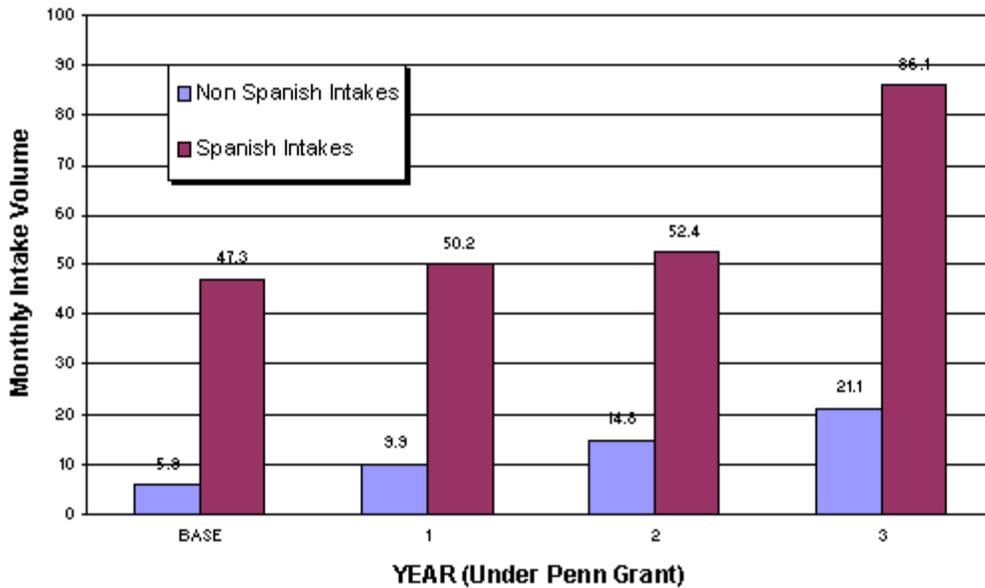
#### *Numbers Served*

During the three years of the William Penn grant, CLS increased its services to clients with limited English proficiency by over 50%. Increases in services to clients who spoke neither English nor Spanish were particularly dramatic, improving by over 250%.

An agency seeking to improve services to LEP persons must, among other things, improve its ability to gather and retrieve data according to language spoken by the client. Before LAP was created, CLS had three language categories for clients: English, Spanish and “Other”. Staff routinely ignored the language data field, which was set to default to English. LAP successfully upgraded CLS’ language data capability in two steps. Initially, we increased the number of languages that could be coded from three to 21 and we began to encourage staff to evaluate the appropriate language choice for each client. Early in Year Three, a second upgrade was completed in the intake software which provided for 44 language choices. More importantly, the language field no longer defaulted to English; each intake form must have a language consciously selected. In addition, we added a separate box to be checked if the client needed an interpreter. Additional training emphasized to staff that they are to record the client’s primary language, even if she is able to speak English, and to use the interpreter box to record client’s who must have services delivered in a language other than English.

Improvement in our data gathering ability was essential to effectively monitor our service to LEP clients. Of course, the changes have also complicated year to year comparisons. To some extent, the improved numbers of LEP clients reflect greater accuracy in the counting process. But it is also clear that we are reaching significantly more LEP clients each month. The graph illustrates the growth of intake from LEP clients during the three years of the William Penn grant, broken down into Spanish and non-Spanish speaking LEP persons.

### BREAKDOWN OF LEP INTAKE VOLUME



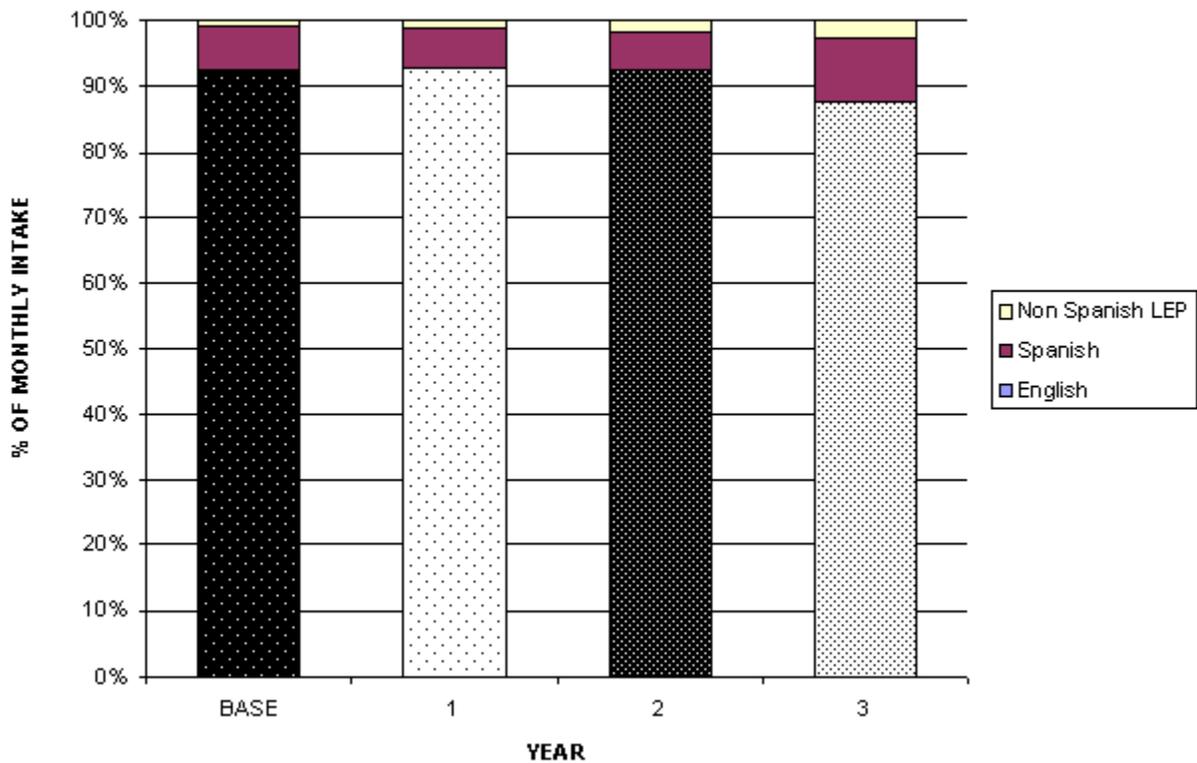
Intake levels for Spanish-speaking clients increased about 5 percent per year during the first two years, and leapt up 64 percent between Years Two and Three. Analysis of the intake statistics by race and language suggests that the bulk of the increase in the last year for Spanish speaking clients may have been the result of changes in data gathering. However, we estimate that there was an actual increase in Spanish-speaking clients of about 17 percent between Years Two and Three, for a total cumulative increase since the base year of about 29 percent.

The graph also makes clear that even more dramatic gains have registered for LEP clients who speak a primary language other than Spanish. That class of clients has increased consistently throughout the grant, in amounts exceeding 40 percent per year, for a total increase over three years of 258%. Based upon cross checking with Asian clients, the increases in the non-Spanish LEP's appear largely unrelated to changes in our data system.

We realized at the end of Year Two that the Spanish numbers were difficult to move as they were relatively large to begin with. In addition, the barriers to Spanish speaking clients were not as difficult as for other language groups, who tend to be more insular and for whom interpreters were harder to find. Combined with a smaller numerical base to begin with, we were able in fact to dramatically increase our numbers for non-Spanish LEP's through increased outreach and greater ease at obtaining interpreters.

Over time, these changes have also changed the language mix of the client base, as is illustrated in this graph:

**MONTHLY INTAKE BREAKDOWN BY LANGUAGE GROUP (%)**



As can be seen, the percentage of LEP clients increased from about 7.5 percent of all clients in the base year to over 12 percent in Year Three, with visible increases in both Spanish and non-Spanish LEP clients. In addition, an analysis of the type of service provided reveals that many more LEP cases are receiving extended representation than three years ago. Whereas the vast majority of LEP cases in the base year received brief advice and referral, now, the majority receive in-depth legal assistance.

*Individual Client Stories from Year Three*

The story offered below illustrates the types of extensive representation now being provided to immigrants and other clients with limited English skills:

*(Additional stories are provided in Exhibit 14.)*

*Ms. T is a Spanish-speaking mother of three children from Puerto Rico. One of her children is disabled. She is unable to communicate in English Ms. T. has, in the past, relied on public benefits such as TANF cash assistance, Medical Assistance, and food stamps, to help care for her family, particularly during periods of unemployment. Ms. T lost a factory job in August 2001. She did not qualify for unemployment and applied for TANF in September, hoping to get back to work*

*as soon as possible. As a condition of receiving TANF, Ms. T signed an "Agreement of Mutual Responsibility" (AMR) with her welfare caseworker, listing certain steps which she needed to take to search for employment and verify her child's disability. Her caseworker was monolingual and the AMR was written by the caseworker in English, despite Ms. T having written on her welfare application that she needed a Spanish interpreter. Ms. T did not understand what was required of her or the significance of the AMR and failed to follow-through on the steps listed in the AMR. The welfare department sent her a notice proposing to sanction her, cutting off all cash assistance to her entire family for at least sixty days as punishment for her failure to follow the "agreement" listed on her AMR.*

*Ms. T. came to CLS after her family's cash assistance had already been terminated. She had not understood the notice the welfare department had sent her; it was also in English. When she realized her benefits had been terminated, she felt disgusted and tried to re-double her efforts to find work rather than try to fight get her benefits back. In the midst of an economic downturn caused by the recession and the events of September 11, her efforts to find work were not successful. By the time Ms. T came to CLS, the thirty day deadline for appealing termination notices had already passed. Public benefits paralegal Abby Adorno and LAP attorney Jon Blazer decided to work together on a appeal effort even though the deadline had passed. A Hearing Officer found fully in Ms. T's favor, affirming CLS' arguments that DPW had violated Title VI of the Civil Rights Act of 1964 in its handling of Ms. T's case. Because the termination notice was sent in English, the Hearing Officer excused the delay in appealing the notice. Furthermore, the hearing decision stated that the welfare office could not sanction a client known to be LEP on the basis of an AMR written in an English and completed with an English speaking caseworker without an interpreter. This hearing decision is the first decision of which we are aware which articulates Title VI as a grounds for reversing a sanction. Shortly after winning her appeal, Ms. T found work sorting mail for a postal carrier.*

### *Representation of Groups of Clients during Year Three*

During the past year, CLS worked on several matters impacting numerous LEP clients. Undertaking representation of groups of clients is a resource-intensive venture. We believe that our willingness to take on these matters serves as an important indication of the priority we are now placing on serving immigrant and LEP communities. These cases also help account for CLS' sharp increase in numbers of LEP clients served during Year Three.

- The New World Association of Emigrants from Eastern Europe is a mutual-aid organization based in Northeast Philadelphia. It provides social and employment-related services to Eastern European immigrants, especially Russians and Ukrainians. We have been developing a partnership with this organization since Year Two of the grant. In March 2002, the New World Association referred to CLS numerous elderly Russians whose adult day center services had been abruptly terminated by the area agency on aging. Adult day centers provide a structured program of activities, including health care services, meals, and socialization, to elderly individuals who have disabilities which are sufficiently severe that they qualify for nursing home level care. The purpose of the adult day services is to prevent the elderly person's having to enter a nursing home by meeting their needs in the community. Many of the Russian adult day center participants, who do not speak English, had suffered from depression as a result of loneliness and cultural isolation before they began attending the centers. Dozens have been informed that they are somehow no longer eligible for this service. The Elderly Law Project is currently representing over a dozen of these individuals, and has entered into negotiations with the area agency on aging concerning civil rights, due process and other violations of this group's rights.*

- *The Palelei Buddhist Temple is situated in the heart of Philadelphia's South Philadelphia Cambodian community, and serves as its central religious and cultural institution. LAP paralegal Nathalie Emam is a member of the Temple and has worked to develop a close relationship with the monks residing at the Temple. The monks, often aware of problems facing community members, were an important source of referrals of cases to CLS. In January 2002, Nathalie learned from some of the monks as well as other Temple members that the Chief Monk has placed the Temple up for sale, and that he planned to use the proceeds towards the purchase of land in West Philadelphia, on which a new Temple complex was to be built. The Chief Monk's decision met immediate opposition from numerous members of the Temple, who believed the destruction of the Temple would be a severe loss for the South Philadelphia Cambodian community, and who worried about the viability of the new land, whose prior use had been as a oil storage facility. Of particular concern was the fact that the Chief Monk had made the decision unilaterally, without seeking the approval of the members or an elected Board, and over the objection of some of the monks. Several Temple members formed the Committee to Save the Palelei Buddhist Temple. The position of this Committee is summarized in a community flyer enclosed as Exhibit 8.*

*A team of CLS attorneys met several times with the Committee as well as several low-income Temple members who sought legal representation from CLS to demand a meeting with the Chief Monk or take legal action to stop the sale on the grounds that the sale had not been authorized by an elected Board, as required by law. The Chief Monk refused to meet or to otherwise explain his actions and in March 2002, CLS requested an emergency hearing on the matter. At this hearing, a Judge issued a Temporary Restraining Order prohibiting the Chief Monk from selling the current Temple and from purchasing any new property. This order is still in effect. CLS has continued its attempt to arrange a meeting with the Chief Monk at which our clients will explore possible resolutions of the dispute. LAP paralegal Nathalie Emam has been absolutely instrumental to this case, working tirelessly both as a client organizer and as a bridge between the clients and the attorneys.*

#### **IV. ADVOCACY**

In order to increase the number of LEP clients served by CLS, LAP's first priority was to provide staff with the tools and awareness to deliver services in the clients' own languages. We also needed to consider whether we needed to be open to providing different kinds of help to LEP clients because their needs might be different from English speaking clients. It became apparent that one way to help all LEP clients was to engage in advocacy with government agencies to push them to make changes as we were at CLS. During Year Three, LAP staff and other CLS advocates have given high priority to advocacy on language rights issues.

##### *Federal Title VI Guidances*

In August 2000, President Clinton issued Executive Order 13166 mandating that all federal agencies develop plans for delivery of services to people with limited English proficiency and requirements to impose on federally-funded programs to take affirmative measures to overcome language barriers. Since that time, and continuing under the Bush administration, federal agencies have been publishing "Guidances" which set forth their expectations for federally funded programs to comply with the prohibition of national origin discrimination contained in Title VI of the Civil Rights Act of 1964.

LAP has coordinated the comments filed by CLS on behalf of LEP clients with a number of federal agencies as they published or republished guidances. We also contributed to the development of comments from other organizations. LAP attorneys Jonathan Blazer and Paul Uyehara drafted the February 2002 CLS response to the republished guidance of the Department of Justice (Exhibit 9). Several LAP suggestions were subsequently adopted by the Justice Department. This impact was especially gratifying given that the Justice Department guidance sets the standard for the rest of the federal government. Public Benefits attorney Sofia Memon, just hired last year, coordinated the April 2002 CLS comments to the Department of Health and Human Services republished guidance, which is of great significance since it applies to the state Welfare Department. Attorneys Beth Shapiro (Elderly Law Project) and Jon Blazer and Paul Uyehara also contributed.

Beth Shapiro coordinated the December 2001 CLS response to a request from the Office of Management and Budget regarding the costs and benefits of compliance with Executive Order 13166. LAP staff contributed to the response, which sought to counter the notion that language rights in government funded services are simply too expensive to protect. We were able to use evidence from our own experience with LAP to demonstrate from a provider's perspective that making a program accessible to language minorities is just not that expensive.

CLS staff also helped other organizations draft their responses. For example,

- Jon Blazer offered suggestions to the National Immigration Law Center on its draft response to the LEP guidance by the Corporation for National and Community Service.
- Paul Uyehara offered helpful suggestions to staff at the Asian Pacific American Law Center on its response to the Justice Department guidance.
- Sofia Memon and Beth Shapiro offered suggestions to the National Health Law Program in connection with its comments to DHHS.

The existence of the LAP of CLS was critical to the formulation of our responses. Few organizations nationwide have staff with concentrated experience both as advocates on language rights issues and as providers of direct service to LEP clients. Our ability to provide insightful analysis of the guidances has helped build our reputation nationally as experts.

### *Office of Inspector General*

The Office of Inspector General (OIG), though a partnership with DPW, handles investigations of suspected welfare fraud. It's investigations may result in termination of public benefits, collection of "overpayments" of public benefits already received, and in some cases, prosecution for welfare fraud. One common form of OIG investigation involves a home-visit, in which an investigator pays a surprise visit to the home of a person applying for or receiving public benefits, requests permission to enter the home, looks around, and asks the client to explain certain information. In the cases highlighted as client stories above, the investigator were trying to verify

who was residing in the homes they visited.

OIG has no system in place for communicating with LEP clients under investigation. Investigators simply do the best they can communicating with clients. This practice has included using children and even neighbors as interpreters. CLS has represented several clients who could not communicate with investigators and who were then subjects of negative investigator reports leading to the denial or termination of benefits. This has sometimes led to grossly unjust outcomes.

In October 2001, CLS met with Washington, DC representatives of Food and Nutrition Services, the federal agency which regulates states' food stamps programs. This meeting pertained to a range of abuses CLS has alleged against OIG in its handling of food stamps investigations. Among these abuses were civil rights violations under Title VI. As a result of this meeting, which included the civil rights compliance officer from FNS' regional office, FNS initiated a Title VI review of OIG's practices which is still underway. One positive outcome already generated is that OIG is now meeting periodically with a small group of legal services advocates, including CLS, to open a dialogue on a range of issues include language access concerns.

#### *Supreme Court Committee on Racial and Gender Bias in the Courts*

Paul Uyehara has devoted a tremendous amount of time in the past year to serving on the Work Group on Language Access for this committee of the Pennsylvania Supreme Court. During the year, the committee conducted legal research, surveyed immigrant agencies on language problems in the courts, and investigated how other states are dealing with the issue. The Work Group has been drafting a report in 2002 to be submitted to the full committee and, hopefully, to the Supreme Court. Paul has been a major contributor to and editor of the report and has been able to influence the substance and tenor of its findings and recommendations. He has also become acquainted with both advocates and court administrators through the work with the committee, including experts in court interpreting and the administration of court interpreter programs. The final committee report to the Supreme Court may well be the impetus for a long overdue court directive that assures that LEP litigants are able to participate meaningfully in court proceedings and that they have the assistance of qualified interpreters.

#### *TANF Re-Authorization*

In February 2002, LAP attorney Jon Blazer published a paper entitled "Improving TANF for Immigrants and People with Limited English Proficiency." This paper makes a comprehensive set of recommendations to Congress as part of its debate on re-authorizing TANF, based on how immigrants and LEPs have fared under TANF in Pennsylvania. The paper also offers recommendations to Pennsylvania's policymakers. This paper was distributed widely at the national level by the Center for Budget and Policy Priorities, and has been circulated to key decision-makers throughout Pennsylvania. A copy of this paper is enclosed as Exhibit 10.

Three CLS attorneys visited Washington, DC in January 2002 as part of a select national

meeting of immigrant and TANF advocates. The goal of the meeting was to set priorities for legislative advocacy aimed at elevating immigrant issues within the TANF re-authorization debate. The three attorneys spent a day meeting with the offices of seven of Pennsylvania's Congress members, pressing the point that TANF needs to be improved for immigrants and LEPs, and circulating a draft of Jon's paper.

### *Emergency Medical Assistance*

Through aggressive individual case representation, educational workshops, production of a practitioner's guide, and ongoing consultation with medical providers, CLS has advocated for expanding and improving the provision of emergency Medical Assistance for individuals irrespective of their immigration status. Federal law requires that states' medicaid programs provide coverage to indigent persons for the treatment of emergency medical conditions, even to persons who are undocumented or otherwise unqualified for regular Medical Assistance due to their immigration status. Pennsylvania's welfare offices have employed a restrictive approach to emergency Medical Assistance requests. Coverage has typically been provided only on retroactive basis, for emergency room visits. Coverage has typically been limited to short-term crises, such as accidents or heart attacks.

Lack of health coverage can have the most critical consequences, including death. Given the importance of securing Medical Assistance for individuals with severe health problems, CLS has devoted significant attention to raising awareness about the existence of emergency Medical Assistance and to working with DPW to make its administration of the program more flexible and humane. CLS has succeeded in obtaining emergency Medical Assistance for immigrant clients with the following types of conditions:

- cancer evaluation and treatment (such as biopsy, chemotherapy, radiation)
- surgery to repair damaged tendons in the hand (after the injury had already been stabilized in the ER), followed by short-term physical therapy.
- hysterectomy
- eye surgery to prevent a retina from eventually becoming detached.

In each of these instances, the coverage was provided prospectively so to enable the immigrant to obtain treatment from a medical provider. In some instances, such as cancer treatment, the coverage has lasted many months.

During Year 3, LAP attorney Jon Blazer and public benefits attorney John Whitelaw provided six different workshops on the topic of immigrants' eligibility for Medical Assistance to specified audiences such as Congreso de Latinos Unidos, the Delaware Valley Health Care Consortium, the Center for Advocacy for the Rights and Interests of the Elderly (CARIE), Philadelphia Department of Health Workers. In addition, CLS took a leading training role in two workshops opened to the general public. These two workshops, sponsored by the Southeast Regional Immigration and Citizenship Coalition (SERICC), were very popular: more than 150 people attended. In conjunction with these workshops, CLS co-authored a practitioners' guide entitled "Immigrant Eligibility for

Medical Assistance in Pennsylvania” (Exhibit 11) which has been widely circulated. CLS provides regular consultation and support to health and social service providers who assist immigrants in applying for emergency and other forms of Medical Assistance.

### *Welfare Offices and Welfare to Work Programs*

In prior two reports, we noted that CLS had been actively engaged in efforts to improve the services provided by the Department of Public Welfare (DPW), particularly its local welfare offices and welfare-to-work programs, to people with limited English proficiency. A team public benefits attorneys from the North Philadelphia office has been coordinating this effort. CLS had filed 10 civil rights complaints on behalf of individual LEPs alleging language discrimination and a broader complaint on behalf of the Refugee Communities Coalition of Philadelphia, a coalition of seven refugee services organizations. The complaints were filed with the Office for Civil Rights (OCR) of the Department of Health and Human Services (DHHS), which is responsible for assuring that programs which receive DHHS funds are complying with civil rights obligations, including the duty to ensure that people with limited English proficiency have meaningful access to their programs. CLS’ clients’ complaints were incorporated into a review by OCR of DPW’s practices, and we have met several times with OCR during the course of its review.

We are very pleased to report that OCR issued a Statement of Finding on its review of DPW’s practices. A copy of this Statement and a cover letter to CLS is enclosed as Exhibit 12. The Statement, issued in March 2002, finds “major deficiencies in the provision of language assistance services in the TANF program.” and concludes that “OCR cannot determine DPW’s overall compliance with its responsibilities under Title VI until the proposed activities are completed and we assess their results.” The Statement offers a lengthy account of the various deficiencies OCR found and establishes time frames by which DPW should take specified remedial actions. These remedies strongly reflect the list of proposed remedies contained within the Refugee Community Coalition’s complaint and, if implemented, will fundamentally change the accessibility of DPW’s welfare offices to LEPs. CLS will remain involved in the process of monitoring DPW’s compliance with the directives of this Statement and will participate an advisory committee charged with identifying problems, proposing changes and assessing DPW’s language assistance program.

CLS has also raised the special needs of immigrants and LEPs as part of its comments on DPW’s proposed program for providing “Extended TANF” to certain groups of persons who hit their five year time-limit for federally funded TANF benefits. In addition to raising these issues as part of its official comments on DPW’s regulations, CLS attorney Brendan Lynch highlighted the special problems facing people with limited English skills as part of a January 2002 Welfare Reform Update circulated to media outlets, advocates, and social service providers state-wide.

### *Social Security Administration*

In our last report we noted that CLS was working to improve the services provided to people with limited English skills at the Social Security Administration (SSA). In 2001, CLS was invited

to testify before the Social Security Advisory Board, which has been charged with advising the President and Congress about policy matters, at their regional meeting in Philadelphia. CLS' testimony focused on the tremendous difficulties faced by limited English proficient individuals attempting to access programs and services provided by the Social Security Administration. Following the Advisory Board's hearing, the Area Director for the Philadelphia Region invited CLS to meet with the acting regional commissioner and local field office managers to discuss improving Social Security's ability to provide linguistically appropriate services. At the meeting in May 2001, CLS provided examples of letters that instruct clients to bring their own interpreter in clear violation of SSA's policy. CLS also raised the inaccessibility of SSA's toll-free number to anyone who does not speak English or Spanish and the lack of bilingual staff and interpreter resources at local field offices.

Following the meeting, the Area Director informed CLS that based on input provided at the meeting, "the Philadelphia Region has already begun research to clarify and standardize the agency policy on interpreter services" and was taking steps to increase interaction with limited English proficient communities. In June 2001, the acting regional commissioner issued a memorandum to all managers in the Philadelphia region clarifying that SSA staff must never state or imply that individuals must provide their own qualified interpreter. The memo also instructed field office managers to ensure that every employee understands and can follow SSA's procedures for communicating appropriately with limited English proficient individuals.

In February 2002, SSA held an Asian American Pacific Islander Community Day to educate people about Social Security programs, get feedback on improving their interpreter services cultural training, and other outreach efforts, and introduce SSA employees who speak Asian languages. Three field offices (out of nine) in Philadelphia employ staff who speak an Asian language, including the office serving Chinatown residents, which recently hired its only employee who speaks Mandarin and Cantonese, the two languages primarily spoken by Chinatown residents. SSA held an outreach event for the Latino community on November 1, 2001.

#### *Bureau of Unemployment Compensation*

In October 2000 the local unemployment offices were closed in Philadelphia and a new system was implemented which required the unemployed to file for unemployment compensation benefits by telephone. The CLS Employment Project has continued to advocate on behalf of limited English proficient claimants. Availability of translation services has still not been meaningfully integrated into the phone system which has now been implemented statewide. Unfortunately, people with limited English skills face severe barriers at every step. We have continued our advocacy efforts beyond individual representation, by meeting with top officials at the Pennsylvania Department of Labor and Industry regarding these problems.

At the federal level, Employment attorney Suzanne Young wrote to the Secretary of the U.S. Department of Labor to advocate for the re-issuance of the DOL's Policy Guidance on the Prohibition against National Origin Discrimination as it Affects Persons with Limited English

Proficiency in March 2002. The Guidance, among other things, would have a direct impact on the standards applicable to the Pennsylvania unemployment compensations system in its handling of LEP claimants. The Employment Project is poised to coordinate comments from CLS staff to the Guidance when it is republished.

Through our partnership with Asian Americans United, an increased number of cases have been referred to our Employment Project for assistance. There have been at least two unemployment compensation cases (which we do not usually handle, but which were accepted in order to enhance our relationship with the limited English speaking Asian communities); one case involved a Cantonese speaking client, Ms. L. and another case involved a Mandarin speaking client, Ms. C. Both cases continue to illustrate the problems encountered by LEP individuals in getting through to the call center and communicating in order to file their claims; responding to English-language questionnaires sent to claimants; filing continuing claims, which is usually done through a telephone keypad data entry system; and participating in an appeal hearing. The difficulties faced by Ms. C. formed the basis for an informal complaint made to the U.S. Secretary of Labor as well as the basis for initiating discussions with the Unemployment Compensation Board of Review regarding the process by which interpretation services are selected and monitored for quality.

We continue to coordinate our advocacy efforts with Friends of Farmworkers, and are currently preparing a Title VI complaint on these issues.

#### *Southeast Regional Immigration and Citizenship Coalition (SERICC)*

SERICC is a Philadelphia-area immigration coalition dedicated to continuing and furthering the American tradition of welcoming immigrants. SERICC supports family reunification, the rescue and resettlement of refugees fleeing persecution and the equitable treatment of immigrants under the law. Both of LAP's staff attorneys participate in SERICC.

Jon Blazer is an active participant in the coalition's Language Access Committee, which is focused on improving the accessibility of Philadelphia's health providers to people with limited English skills. During Year 3, as part of this Committee's work, Jon supervised three Masters in Public Health students for a three week full-time internship. The students undertook field research to determine what systems are utilized by the various District Health Centers run by Philadelphia's Department of Health in order to bridge language barriers with its LEP patients. The students found glaring problems in the Health Centers' delivery of medical care to LEP patients, with centers generally requiring patients to bring friends and family, including children, to interpret. The Committee is finalizing a report based on the students' findings that will be presented to the Department of Health.

Paul Uyehara had served on the coalition's Immigrant Empowerment Committee previously, which focused on identifying local campaigns that provide opportunities for grassroots immigrant organizing and leadership development. In Year Three, Paul continued to participate as the

committee transformed into the Immigrant Organizing Project of Philadelphia, which sponsored open meetings in April and June 2001 to lay the groundwork to form a grassroots immigrant organization.

Jon and Paul are also working with a group of SERICC members in challenging the drastic tightening of procedures for obtaining marriage licenses in Philadelphia and for obtaining drivers licenses or state identification from PennDOT's motor vehicle offices state-wide. In the wake of 9/11, these agencies have imposed restrictions aimed at making it more difficult for immigrants to obtain marriage and drivers' licenses. However, the restrictions are grossly over-broad and discriminate against a wide range of immigrants seeking licenses for lawful purposes.

## **V. NEXT STEPS**

The LAP funded by the William Penn Foundation has been a great success. In the past three years, the Project has been able to fundamentally change the manner in which the program delivers services to immigrant and other LEP clients. The program, its managers and most of the staff now understand that we must deliver service to clients in their preferred language. If that language is not English, staff and contracted services have been made readily available so that service is delivered by a bilingual staff member, or by an English speaking advocate with the help of a trained interpreter. Many staff members are now trained in how to work with interpreters and a few are knowledgeable enough to train the interpreters themselves.

The work done within CLS by LAP staff to devise methods to deliver services in other languages has given us insight into the problems faced by providers generally in complying with mandates on language access. We have gained sufficient expertise to train other programs on how to make themselves accessible. This experience as a provider also has made us better advocates for clients denied proper services. We can appreciate not only the legal obligations placed on other providers, but also the work needed to implement changes.

During the grant period, CLS staff have developed a considerable level of expertise in language rights and have used that expertise to advocate for clients and to train others on the issues. CLS staff have been able to contribute significantly to the national discourse on language discrimination which was stimulated by the issuance of Executive Order 13166 on government services to LEP persons in August 2000. The expertise is not confined to the staff assigned to LAP; a number of other advocates have developed a working knowledge in the area and have taken up the issue in the context of their existing areas of practice. We have filed formal comments about proposed guidances by several federal departments and helped other advocates in their comments. A large portion of a report on language issues to be presented to our state Supreme Court Committee on Race and Gender Bias in the Courts has been written or edited by a LAP lawyer. Our civil rights complaints against the state welfare department are causing changes effecting thousands of poor, limited English proficient families in their ability to access critical benefits and services and to move from welfare to work. The Bureau of Unemployment Compensation is being pushed to make its telephone claims system accessible for non-English speaking workers.

Most importantly, we have taken great leaps in making the program more accessible to LEP clients. We are seeing significantly more LEP clients each month as compared to before the grant, we are able to track them better, and we are committed to provide a higher level of service than ever before. We are helping many more Spanish speaking clients. And we increased our services even more dramatically to clients who speak neither English nor Spanish, a group which faced the greatest language barriers in the past due to the program's lack of any practicable system for providing language assistance to these individuals.

Although this William Penn grant will not be renewed, CLS has committed to maintaining the LAP. Discussions are being held to determine changes that need to be considered for LAP and new sources of funding are being sought. There is no shortage of work for the staff. In the future, we need to continue to advocate for LEP clients both within and outside of CLS. Some areas that still need attention are:

#### *Training*

- ▶ Complete mandatory training of all case handlers on how to work effectively with interpreters and the language services available to staff
- ▶ Complete mandatory training of all bilingual staff who serve as in-house interpreters on how to interpret
- ▶ Continue to provide trainings for other providers, especially legal services programs, on how to make programs accessible to language minorities. (CLS has become a local and national model; we intend to publish our success.)
- ▶ Continue to provide trainings to staff and other advocates on the rights of LEPs

#### *Monitoring*

- ▶ Continue to monitor CLS efforts to reach out and deliver services to LEP clients
- ▶ Further develop our data gathering capacity so that progress can be more easily measured and compared.
- ▶ Provide feedback to individual units on methods to increase service, including best practices of units that are strong in this area.

#### *Advocacy*

- ▶ Provide further comments on federal agency guidances as they are republished, and assist other advocates in preparation of their comments.
- ▶ Complete the report to the state Supreme Court Committee about language access in the court system, advocate for adoption of our recommendations and remain involved in the hoped for implementation phase.
- ▶ Take up select cases to press complaints against systems and providers that are not complying with language access requirements.

#### *Delivery of Legal Services*

- ▶ Continue to provide leadership within CLS in terms of taking on direct representation cases from LEP clients and raising language issues.
- ▶ Finalize and distribute widely the two multi-lingual brochures, and increase the number of other translated materials so to better communicate with LEP clients
- ▶ Promote more outreach and community education, targeted to immigrant groups and those who work with them, and build relationships to more organizations that comprise or work with immigrants. Encourage a broader range of CLS staff to accept responsibility for undertaking these outreach and community education to LEP communities.
- ▶ Assess the feasibility of CLS creating a new immigration law unit, so to enable us to serve clients in this critical area.

It is obvious that there is much work remaining to be done. Yet we feel a great sense of accomplishment already, in that we know that the William Penn grant has allowed us to actually change CLS culture in working with limited English proficient clients.

## **EXHIBITS**

1. Expenditure Report - Year Three
2. Audited Financial Statements
3. CLS Staff Language Directory
4. Workers' Rights Handbook
5. "Making Your Legal Services Program Accessible to Clients with Limited English Proficiency - An Approach"
6. CLS multilingual draft brochure "Do You Have a Legal Problem?"
7. CLS brochure "Providing Free Legal Services to Philadelphia's Low Income Communities"
8. Flyer "Update on our Efforts to Save the Temple"
9. 2/19/02 Letter to Merrily Friedlander, Department of Justice (commenting on proposed Guidance.)
10. "Improving TANF for Immigrants and People with Limited English Proficiency: Recommendations to Congress as part of TANF Re-authorization and to Pennsylvania's Policymakers as part of TANF Implementation" 2/21/02
11. Immigrant Eligibility for Medical Assistance in Pennsylvania booklet, 10/01
12. 3/28/02 Letter from U.S. Department of Health and Human Services, Office for Civil Rights and Statement of Finding (regarding access to TANF by LEP persons)
13. Examples of New Partnerships formed in Year Three of CLS Grant
14. CLS Language Access Project Client Stories — Year Three
15. Spring/Summer 2001 Newsletter — Featuring CLS' LAP