

The New York City Administration for  
Children's Services

## 2021 Language Access Implementation Plan



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## **MESSAGE FROM COMMISSIONER DAVID HANSELL**

The NYC Administration for Children's Services (ACS) is committed to protecting all New York City children and supporting their families no matter their national origin, legal status or English language proficiency. We know that 23% of NYC families are limited-English proficient, and ensuring these families have meaningful language access support is critical to our work.

We are proud of the extensive language access services currently offered to the families we work with, including interpretation services which include in-person, telephonic and video-remote platforms and written translation. However, in the years ahead, we plan to build upon and improve this work further. The 2021 Language Access Implementation Plan outlines the work we are doing to expand internal communication on and awareness of ACS's language access services and policy, enhance the quality and consistency of language access services and continue engaging with families and advocating on language access issues. We are committed to making sure all New York City children and families with limited English proficiency have equal access to the programs and services provided by ACS and our contracted providers.

Thank you for your support of this vital and challenging work.

David Hansell

Commissioner, NYC Administration for Children's Services

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## **I. Agency Mission and Background**

The Administration for Children's Services (ACS) is responsible for protecting the safety and promoting the well-being of New York City's children and strengthening their families by providing child welfare, juvenile justice, child care and early education services. In child welfare, ACS contracts with nonprofit organizations to support and stabilize families at risk of a crisis through prevention services and with foster care agencies for children not able to remain safely at home. Each year, the agency's Division of Child Protection conducts over 45,000 investigations of suspected child abuse or neglect. In youth and family justice, ACS manages and funds services including detention and Close to Home placement, intensive community-based alternatives for youth, and support services for families. In the Division of Child and Family Well-Being, created in September 2017, ACS issues child care vouchers for more than 64,000 children eligible for subsidized child care, and promotes a two-generation approach to child and family well-being, family stability, and equity through public education campaigns and a place-based approach including Family Enrichment Centers and the Community Partnership Program.

## **II. Agency Language Access Policy and Goals**

The Administration for Children's Services (ACS) seeks to administer equitable child welfare and juvenile justice systems in which a child or family's race, ethnicity, national origin, immigration status, language, gender, gender identity/gender expression and sexual orientation do not predict how they fare. As part of these equity goals, ACS is committed to ensure that New York City's children and families with limited English proficiency have equal access to all programs and services provided by ACS and our contracted providers. In order to achieve this, ACS provides interpretation in over 240 languages, translates commonly distributed public facing documents into the 10 priority Citywide languages required by Local Law 30 (Spanish, Chinese, Bengali, Russian, Arabic, Urdu, Haitian Creole, Korean, Polish and French) and translates other important agency documents on demand. All language access services are free to NYC families.

ACS's Language Access Policy is integral to the Agency's mission to promote the safety and well-being of all NYC children and ensuring NYC families have access to our programs and services. Quality and timely language access services enable the effective and constructive interactions between staff and families that are needed for improving outcomes for children and families. Individuals should not face obstacles to receiving any ACS services for which they may be eligible because they do not speak, understand, or read and/or write English. Similarly, the outcome of an ACS child protective investigation must not be impacted by the language a family speaks. ACS requires implicit bias training for all staff and provides continual discussion and learning opportunities about race, diversity, intersectionality, oppression and systemic racism.

ACS is proud of the extensive language access services we currently offer and will use the next three years to build on and improve those existing services. ACS's overarching goals for the 2021 Language Access Implementation Plan (LAIP) are:

1. Expand internal communication on and awareness of ACS's language access services and policy;
2. Enhance quality and consistency of language access services;

3. Continue to engage with ACS families and advocates on language access issues.

**Goal 1: Expand internal communication on and awareness of ACS's language access services and policy**

As ACS prioritized in the last LAIP, the Agency is in the process of finalizing ACS's new Language Access Policy, which will replace previous versions of the policy to ensure compliance with the latest local law. The Policy was sent for public comment, suggestions are being incorporated where appropriate and the Policy will soon be sent to our state oversight agency for final approval.

The Policy applies to all ACS and provider agencies, including Prevention and Foster Care services. One of the most important goals of the next three years will be to ensure that knowledge and awareness of the new Language Access Policy and its requirements reach all ACS and provider agency staff. To do so, the ACS Office of Immigrant Services and Language Affairs (ISLA) will be coordinating an Agency-wide initiative to train all staff on the new Policy. This will include working with the James Satterwhite Academy, which trains all new Child Protection Specialists (CPS) and the ACS Workforce Institute, which provides continuing education and training to ACS and provider agency staff, to ensure they are incorporating the new Language Access Policy in their language access guidance.

In addition, ISLA will be providing language access trainings directly to ACS divisions and provider agencies. Furthermore, ISLA will be responsible for creating and regularly updating ACS division/agency specific language access desk aids, which summarize clients' language access rights, language access best practices and how to access language access services.

**Goal 2: Enhance quality and consistency of language access services**

To help better coordinate language access services at ACS, a major development since our 2018 plan is that ACS consolidated all language access contract management and policy guidance into our ACS Office of Immigrant Services and Language Affairs (ISLA). To support this new organizational structure, ACS created and hired for a new position, Language Access Contract Manager, whose exclusive focus is overseeing the Agency's five language access contracts. This restructuring and staffing have allowed us to approach contract management through a language access lens, ensuring that our interpretation and translation vendors are not only providing their contracted services, but doing so in the best way possible to meet the needs of our LEP client population.

Over the next three-year period, we aim to create clear feedback loops, using information from LEP families, frontline staff, interpreters and advocates to inform future service provision. To that end, we will work closely with our vendors, the NYC Department of Citywide Administrative Services (DCAS), who manages the master contracts, and our staff to create systems that provide ACS Language Access Contract Management with consistent and comprehensive feedback.

In addition, we hope to expand ACS's internal capacity to provide services directly in other languages, rather than only through third party interpreters. Currently, ACS staff generally do not provide services in languages other than English. Our goal is to work toward a system by which ACS staff can be certified for fluency in languages other than English and voluntarily provide services directly in those languages, rather than needing to use a third-party interpreter. In addition, we would like to increase the number of bilingual staff at the Agency, through recruitment and use of the selective certification hiring process.

Finally, we will work closely with the vendors who provide interpretation and translation services, to strengthen their capacity to support language access in the child welfare context. Child welfare terminology is unique and contains many terms of art. Precision and consistency is extremely important in interpretation and translation, as the vocabulary used can impact the trajectory of an investigation. For that reason, since the previous LAIP, ACS has developed a child welfare-specific style guide and glossary, which has been distributed to our vendors. We hope to build on this foundation and provide further training and guidance to interpreters and translators on trauma-informed interpretation practices.

**Goal 3: Continue to Engage with families and advocates on language access issues.**

ACS recognizes the importance of family voice in the child welfare system. In our previous LAIP, we stated a goal of ensuring that the youth, families, and communities ACS serves are aware of their right to free language services. While we have made progress on this goal, there is still work to be done, and for that reason are including it again in our new LAIP.

Since the last LAIP, ACS has prioritized creating mechanisms to involve parents and youth voice in policy and practice. ACS established a Parent Advisory Council with 21 members. It includes individuals who work with organizations that formed the original Steering Committee and that represent voices from across the spectrum of ACS programs. ACS also established a Youth Leadership Council to bring together the voices (experiences, complications, triumphs, challenges, needs) of youth that are system-involved into the development and implementation of policies, programs and services that positively impact young people in and who have exited out of the foster care and juvenile justice systems. Our goal for the next LAIP period is to engage the Parent Advisory Council and Youth Leadership Council on ACS's language access programming. We will use their feedback to help ACS strengthen our language access work and make it more responsive to the needs of parents and youths.

Over the next few years, we will continue outreach to community members to raise awareness about ACS's language access program, specifically on families' rights to free interpretation services, that requesting services will not prejudice their cases and how and where to provide feedback on their language access experience. ACS will continue our work with the Supporting Immigrant Children and Families Working Group, made up of ACS staff and advocates, to receive consistent and current feedback on ACS's language access services and build a collaborative relationship with advocates and the families we serve.

In addition, we plan to review all ACS public access offices to ensure free interpretation signage is up-to-date and easily visible for LEP families upon entering the space. We will do a full review with all public facing divisions to ensure free interpretation signs are placed in all entrances and in conference rooms used by families and provide continuing technical support to ensure they are kept current in the future.

**III. Agency Language Access Accomplishments and Progress on Goals from Previous LAIP**

ACS's laid out three overarching goals in our last LAIP:

1. Support public-facing staff who work with LEP clients;
2. Collect, measure and evaluate key data; and
3. Enhance community awareness and engagement.

Over the past three years, ACS has made significant progress on all three fronts. We will discuss each in turn.

### **Goal One: Support Public-Facing Staff Who Work With LEP Clients**

#### ***Language Access Policy and Training***

As prioritized in our first Language Access Implementation Plan, ACS developed a new ACS Language Access Policy, which reflects the language access obligations of all divisions and contracted providers. Development of the new Language Access Policy required extensive cross-divisional support and coordination, and ISLA worked closely with the ACS Division of Policy, Planning and Measurement to ensure feedback was incorporated from every ACS division. As is the protocol for all ACS policies, the Policy was sent for public comment, and comments are being incorporated as appropriate. ACS will soon seek interim approval, while the Policy awaits final approval from ACS's oversight agency, the NY State Office of Children and Family Services (OCFS).

The ACS Office of Immigrant Services and Language Affairs (ISLA) will be collaborating with ACS's training institutes, the James Satterwhite Academy, which trains all new Child Protection Specialists (CPS) and the ACS Workforce Institute, which provides continuing education and training to ACS and provider agency staff, to ensure they are incorporating the new Language Access Policy in their language access guidance. In addition, ISLA will provide trainings directly to ACS and provider agency staff on the new Language Access Policy, once it has received interim approval status.

#### ***Upgrading Technology***

ACS completed the goal of providing frontline CPS with tablets to support prompt delivery of services, including language access services, in the field. In addition, ACS rolled out the Language Line Solutions application, which staff can download to their tablet or ACS-issued smartphone. The application helps connect ACS and provider agency staff to a telephonic interpreter at the touch of a button, rather than necessitating that they remember the Language Line hotline number and their agency code, ACS has also upgraded key forms to make them electronically fillable and has integrated language accessibility in this project by ensuring the fillable forms are available in the 10 Citywide languages.

As planned in the previous LAIP, ACS developed a new electronic system for requesting in-person or video-remote interpretation sessions, replacing the paper voucher system. This new process removes additional barriers to requesting an interpreter for ACS staff, thereby ensuring that language access services are requested and offered as quickly as possible for LEP families. In addition, the new electronic system allows for ACS contract management to receive faster and more specific feedback about quality of interpretation services.

#### ***Plain Language***

ACS created a cross-divisional team of key staff that met regularly to review the Agency's existing forms for plain language. In 2018, that team conducted an intensive review of ACS's existing public-facing documents (forms and brochures). The group reviewed 500 forms and brochures and determined that there are approximately 60 public-facing forms and approximately 20 brochures that are in active use and are commonly distributed. The remaining forms were used by staffers for internal use within ACS. ACS hired a consultant to review these key public facing forms and re-write them in plain language. The commonly distributed public facing plain language forms were then translated into the ten Citywide

languages. The forms and their translations are posted on ACS's internal internet page, to be made easily available for all staff.

In addition, ACS hired a consultant to provide plain language trainings to public-facing ACS divisions, thereby building internal capacity to write public-facing documents in plain language going forward. The consultant conducted six plain language trainings across ACS's public facing divisions, including the ACS External Affairs division, which is has primary responsibility for public-facing communications.

### ***Translations***

The ACS Office of Immigrant Services and Language Affairs (ISLA) provides trainings to all public-facing ACS divisions on Local Law 30's translation requirements. In addition, ISLA sends an annual reminder to agency leadership on the requirement to translate all commonly distributed public facing documents into the 10 Citywide languages. ACS has also developed a Style Guide and Glossary of key terms (translated into the 10 Citywide languages) to improve the quality and consistency of agency translations.

## **Goal Two: Collect, Measure and Evaluate Key Data**

### ***Building Internal Capacity***

Since the last Language Access Implementation plan, ACS has consolidated its language access policy and language access contract management work into one office: the ACS Office of Immigrant Services and Language Affairs (ISLA). In addition, this office was elevated to a standalone office within the Division of External Affairs, reporting directly to the Deputy Commissioner, and was given greater resources and staff, to ensure that language access contract management was conducted through a language access lens.

ISLA engages in regular outreach to community groups and advocates to ensure that feedback on language access is received and incorporated into agency practice and quality assurance. ISLA conducts regular meetings and listening sessions with ACS and provider agency staff, in addition to sending out surveys to staff who request language access services, to receive feedback on the quality of interpretation services.

### ***Updating Data Fields***

In addition, in our 2018 LAIP, we discussed that we would be working with the NY State Office of Children and Family Services (OCFS) to propose changes to the way we are required to collect data on families' language needs. All child welfare agencies in NY State must use the child welfare database CONNECTIONS (CNNX) to document information about clients and families. We worked closely with the State team who manages the database to propose changes to the way language data is collected in this database. The State team agreed to clarify in the database that the "Language" field is asking for the clients "Preferred Language" and to include a new data field in the database, which will specifically track if the individual is limited-English proficient (LEP). This change was rolled out in 2020 and will provide more precise data on ACS's LEP client population in the future.

## **Goal Three: Enhance Community Awareness and Engagement**

ACS's Communications team has made strides in reaching immigrant and LEP New Yorkers. Since the 2018 LAIP, ACS added a bilingual press secretary, who focuses on increasing outreach to ethnic and non-English



media. With his support, we actively pitch ethnic media outlets, including Spanish language media outlets. We secured approximately 20 such stories in 2020. As a result of our efforts, we have built close relationships with assignment desk managers, reporters and anchors in Spanish language media outlets including: El Diario, Univision, Telemundo, and NY1 Noticias. Any and all media inquiries we receive from Spanish language media are provided with statements or background information in Spanish and English. We also make available Spanish-speaking ACS representatives for interviews in Spanish. When our ACS representatives are doing media interviews in Spanish, we conduct media training and provide talking points in Spanish for support. ACS translates key press releases into Spanish, which are posted to our public website (<https://www1.nyc.gov/site/acs/about/pressReleasesEsp.page>). In addition, the ACS website is available in translation through google translate, and key documents posted to the public facing website are translated into the 10 Citywide languages.

The ACS Communications Team works closely with City agencies and the City Hall Creative Communications Team to share vital information about citywide resources via social media. As part of that work, each month, we make sure there are social media posts in Spanish. Below are a just few examples of Spanish language social media posts in 2020:

- NYC ACS on Twitter: "Social distancing shouldn't mean social isolation. If you or someone you know is struggling, call for help. El distanciamiento social no significa aislamiento social. Si tu, o alguien que tu conoces tiene dificultades, solicita ayuda. <https://t.co/bZIP7I2CL9>" / Twitter
- NYC Immigrant Affairs on Twitter: "Get tested for #COVID19 at any of NYC's testing sites today! Safe. Simple. Easy. ¡En NYC hay nuevos centros para realizar pruebas de detección de COVID-19! Seguro, sencillo y fácil. 纽约市开放了新的COVID-19检测站点！安全，简单，便利。 <https://t.co/uwynPQgs9A> #FightCovidNYC <https://t.co/3cTbzurSGZ>" / Twitter
- NYC Immigrant Affairs on Twitter: "New York City Begins Phase Two of Reopening This announcement is available in additional languages in this thread. <https://t.co/nB57aSi51h>" / Twitter
- NYC ACS on Twitter: "¿Se siente abrumado? ¡Usted no está solo! Visite la nueva página web de @ACSNYC para encontrar recursos que lo ayudarán a sobrellevar el #COVID19, incluyendo despensas de comida, actividades para niños y más. #COVID19 <https://t.co/cli0yYI5yr> <https://t.co/AWTCTGeQ1U>" / Twitter
- NYC ACS on Twitter: "Padres y cuidadores: Si se sienten abrumados durante este momento complicado, ¡recuerden que no están solos! Visiten el nuevo sitio web de @ACSNYC para obtener información sobre los diversos recursos gratis para ustedes y su familia. <https://t.co/POQIU5i63R> <https://t.co/uMq1qBR4q2>" / Twitter

In regards to direct community outreach, ACS's language access services are discussed in ACS's "Getting to Know ACS" presentations, which are given to community groups and public sector partners across the city to help explain the child welfare, juvenile justice and early child care and education programs and policies. Interpretation for "Getting to Know ACS" presentations is available, depending on the audience language needs.

In addition, ACS has developed flyers for our Prevention Services provider agencies, explaining clients' language access rights and the agencies' obligations. The flyers also outline agency-specific instructions on how to request interpretation services and make any language access complaints. This information is also included in ISLA's trainings for provider agencies.

#### IV. LEP Population Assessment

##### **Factor 1: The number or proportion of LEP persons in the eligible service population**

According to the Mayor's Office of Immigrant Affairs (MOIA) 2019 Annual Report, 23% of New Yorkers are limited-English proficient (LEP).<sup>1</sup> Of that population, MOIA provides information on the percentage of LEP foreign-born New Yorkers who speak different languages, which is included below:

	<b>Language Spoken by the foreign-born with LEP</b>	<b>% of all foreign-born LEP in NYC (2019)</b>
1	Spanish	45.00%
2	Chinese*	20.00%
3	Russian	7.00%
4	Bengali	4.00%
5	Haitian Creole	2.30%
6	Korean	2.20%
7	Arabic	1.70%
8	French	1.60%
9	Polish	1.50%
10	Urdu	1.40%

*Source: Mayor's Office of Immigrant Affairs (MOIA) Annual Report for Calendar Year 2019, "State of Our Immigrant City."*

Another helpful dataset for NYC's population is from the American Community Survey, the last 5-year survey available is from 2017, and is pasted below:

##### **Top Languages Spoken at Home by Limited English Proficiency (LEP) 2013-2017 American Community Survey Summary File**

	<b>Total</b>	<b>Percent</b>
<b>Total LEP</b>	<b>1,844,527</b>	<b>100</b>
Spanish	887,413	48.1
Chinese (incl. Mandarin, Cantonese)	341,489	18.5
Russian	111,237	6

<sup>1</sup> Mayor's Office of Immigrant Affairs (MOIA) Annual Report for Calendar Year 2019, "State of Our Immigrant City," <https://www1.nyc.gov/assets/immigrants/downloads/pdf/MOIA-Annual-Report-for-2019.pdf> at p19.

Bengali	57,364	3.1
Korean	45,732	2.5
Haitian	44,841	2.4
Yiddish, Pennsylvania Dutch or other West Germanic language)	31,374	1.7
Arabic	28,147	1.5
Italian	26,731	1.4
Polish	25,443	1.4
French (incl. Cajun)	22,207	1.2
Yoruba, Twi, Igbo or other languages of Western Africa	21,327	1.2

**Factor 2: The frequency with which LEP individuals come into contact with the agency**

At ACS, we have several different ways of measuring out LEP client population and their language needs. As noted above, ACS, like other child welfare agencies in New York State, is legally mandated use the statewide database CONNECTIONS (CNNX). ACS and provider agency staff who use CNNX as their record keeping system enter all relevant information, including the client’s preferred language for communication, into the database. If the client speaks one language, but reads and/or writes in another, staff indicate the latter language within the progress notes in the database. See below for the reports for the primary language of individuals with ACS cases (which were referred to ACS through the State Central Registry) in 2020 and 2019:

**Primary Language of Individuals Involved in SCR Reports, CY20 and CY19**

Includes children, subjects, and other family members who had no role in the SCR report.

A persons may be counted more than once with were involved in more than one SCR intake during the year

Language	Persons in SCR Intakes CY20		Persons in SCR Intakes CY19	
	#	%	#	%
English	163,622	86.95%	213,245	86.07%
Spanish	15,760	8.37%	22,016	8.89%
Unknown	3,451	1.83%	5,095	2.06%
Mandarin	1,011	0.54%	1,378	0.56%
Multiple Languages	981	0.52%	1,487	0.60%
Bengali	748	0.40%	964	0.39%
Arabic	528	0.28%	627	0.25%
Russian	420	0.22%	501	0.20%
Creole	330	0.18%	427	0.17%
Cantonese	221	0.12%	304	0.12%
French	173	0.09%	260	0.10%
Chinese	153	0.08%	296	0.12%
Urdu	142	0.08%	231	0.09%
Amer Sign	93	0.05%	103	0.04%
Punjabi	79	0.04%	93	0.04%
Korean	77	0.04%	108	0.04%
Polish	55	0.03%	47	0.02%

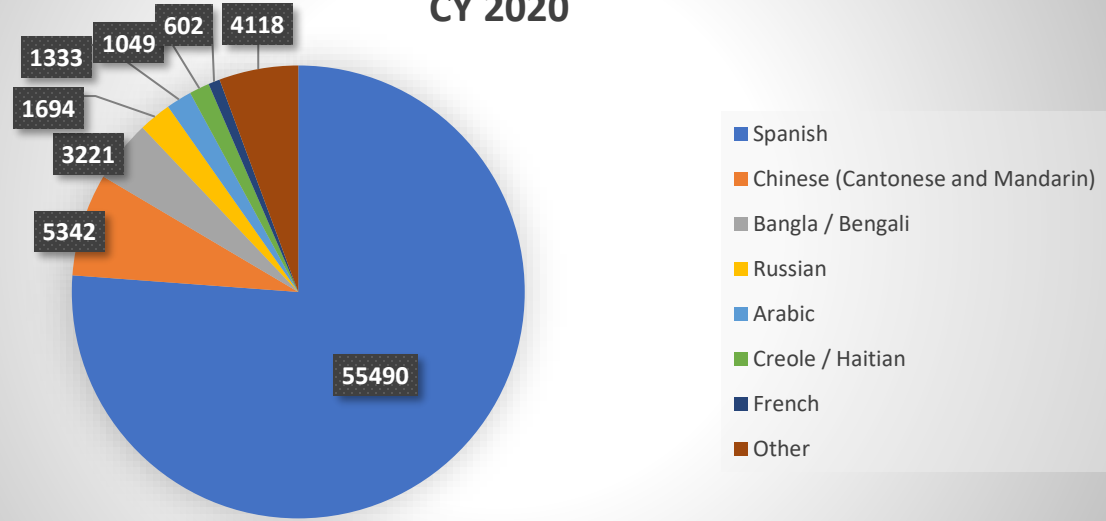
Hindu	36	0.02%	40	0.02%
Yiddish	36	0.02%	22	0.01%
Fujianese	35	0.02%	35	0.01%
Vietnamese	30	0.02%	37	0.01%
Albanian	24	0.01%	71	0.03%
Hebrew	23	0.01%	42	0.02%
Fulani	22	0.01%	64	0.03%
Portuguese	17	0.01%	50	0.02%
Romanian	17	0.01%	29	0.01%
Japanese	13	0.01%	14	0.01%
Ethiopian	12	0.01%	20	0.01%
Czech	10	0.01%	19	0.01%
Italian	10	0.01%	16	0.01%
Nigerian Ibo	9	0.00%	10	0.00%
Nat Am Lan	7	0.00%	9	0.00%
SerboCroatian	7	0.00%	14	0.01%
Tagalog	6	0.00%	17	0.01%
German	5	0.00%	4	0.00%
Greek	5	0.00%	8	0.00%
Farsi	4	0.00%	10	0.00%
Filipino	4	0.00%	4	0.00%
Cambodian	3	0.00%	3	0.00%
Braille	2	0.00%	3	0.00%
Gukarati	2	0.00%	12	0.00%
Bosnian	1	0.00%	4	0.00%
Khmer	0	0.00%	5	0.00%
<b>TOTAL</b>	<b>188,184</b>	<b>100%</b>	<b>247,744</b>	<b>100%</b>

Data Source: Connections as of 2/20/2002 for CY19 and 2/08/2021 for CY20,  
Prepared by Report Development and Analysis Unit/ORR/DPPM

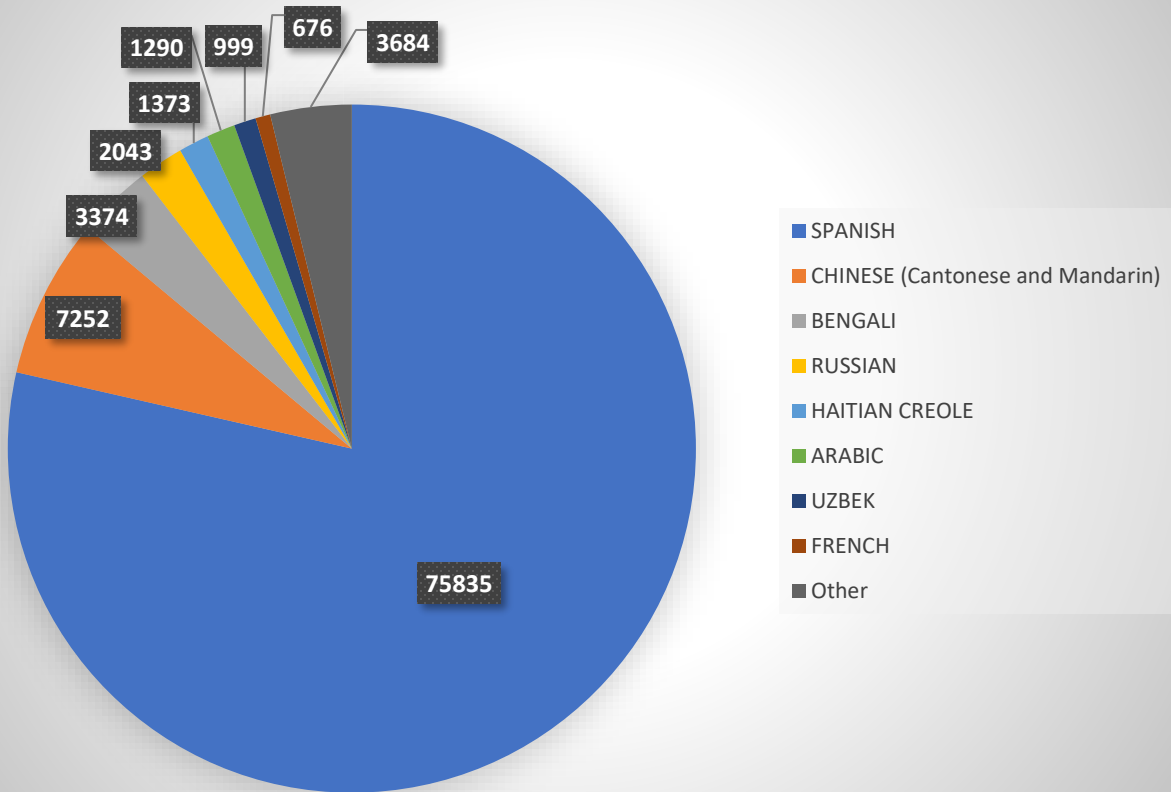
ACS considers all interactions with children and families as part of the agency's services and engagements. As such, ACS also uses vendor data from instances when interpretation services were provided in-person and telephonic.

Below is the data from our in-person and video-remote and our telephonic interpretation requests for CY2020.

### In-Person and Video-Remote Interpretation Requests in CY 2020



### Telephonic Interpretation Requests in CY2020



We can use the data from CNNX and our vendors, to draw a comparison with the LEP percentage data from MOIA. Please see below:

	Language Spoken by the foreign-born with LEP	% of all foreign-born LEP in NYC (2019)	% of all LEP in CNNX (2020)	% of all Accurate Requests	% of all LLS Telephonic Requests
1	Spanish	45.00%	78%	76%	79%
2	Chinese*	20.00%	7%	7%	8%
3	Russian	7.00%	2%	2%	2%
4	Bengali	4.00%	4%	4%	3%
5	Haitian Creole	2.30%	2%	1%	1%
6	Korean	2.20%	0%	0%	0%
7	Arabic	1.70%	3%	2%	1%
8	French	1.60%	1%	1%	1%
9	Polish	1.50%	0%	0%	0%
10	Urdu	1.40%	1%	1%	1%

A clear takeaway from ACS’s data compared against the citywide LEP data is the percentage of ACS-involved LEP individuals who are Spanish-speaking is much higher than the citywide numbers. For this reason, ACS has developed a dedicated On-Site Spanish interpretation program, which provides onsite interpreters at ACS field offices. This data will also inform our goal of increasing bilingual capacity of ACS staff, so as to reflect our LEP client needs.

**Factor 3: The importance of the benefit, service, information, or encounter to the limited English proficient person**

Providing meaningful and accessible language services is vital to ACS’s mission of promoting the safety and wellbeing of all NYC children. Much of ACS’s work with families is rooted in a family engagement model, which requires collaboration between the child welfare professional and the families we serve. In order to be successful, families must have the ability to fully participate in the process and there must be trust between the parties. As such, meaningful communication, through quality and easily accessible interpretation and translation, is a necessary prerequisite for ACS’s model of work. The Agency is constantly striving to improve the quality of our language services and minimize barriers to receiving those services.

Specifically, this Plan reflects ACS’s commitment to providing language access services and meeting the following over-arching goals:

1. Expand internal communication on and awareness of ACS’s language access services and policy;
2. Enhance quality and consistency of language access services;
3. Engage with ACS families and advocates on language access issues.

**V. Provision of Language Access Services**

ACS has one of the largest investments in language access vendor services of any City agency. We provide in-person, video-remote, on-site Spanish and telephonic interpretation and written translation,

through two different vendors: Accurate Communication and Language Line. Frontline staff receive training on how to access language services during onboarding and receive additional refresher training after that. ACS Immigrant Services and Language Affairs prepares and regularly updates division-specific Desk Aids with clear instructions on how to request interpretation and translation services, an explanation of LEP clients' right to interpretation and translation services and guidance on where/how to make complaints.

### ***Translation Services***

ACS contracts with Language Line Solutions (Language Line or LLS) to provide translation services for the agency. ACS has a dedicated Language Access Contract Manager, who is part of the ACS Office of Immigrant Services and Language Affairs. The Contract Manager liaises with LLS to request that documents are translated. ACS ISLA provides trainings to leadership in different public-facing divisions on the LL30 requirements to translate commonly distributed public-facing documents into the 10 Citywide languages.

The new ACS Language Access Policy defines "commonly distributed documents" as those ACS documents most often provided to families that contain or elicit important and necessary information regarding the provision of services, i.e., those relating to:

- Program participation (e.g., intake and consent forms);
- Reduction, denial, or termination of services or benefits and the right to appeal such actions;
- Actions and proceedings affecting parental custody (excluding court filings);
- Administrative hearings and/or other investigations;
- The recipient's awareness of rights, requirements, or responsibilities; and
- Time-sensitive or required responses from an LEP individual.

ISLA sends an annual reminder to leadership in all public-facing divisions to conduct an internal review to see if there are any new commonly distributed public facing documents that have not yet been translated. In addition to commonly distributed documents, a large number of ACS's translations are case-specific documents for individual clients, such as conference notes and/or other client documents.

ACS has developed a translation style guide and glossary (translated into the 10 Citywide languages), to ensure that translations are consistent and accurate. All translations of public documents are sent to the divisions for distribution to clients and are posted on the ACS ISLA internal internet page, to be easily available to staff. Translation requests, like any other language access request or inquiry, can be sent directly to our language access mailbox: [language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov).

### ***Interpretation Services***

ACS provides interpretation services through two different vendors: Accurate Communication and Language Line Solutions. Accurate Communication provides ACS with in-person, video-remote and ASL interpretation. Language Line Solutions provides telephonic interpretation. Between the two vendors, interpretation is available to ACS-involved families 24 hours a day, 7 days a week. Accurate Communication has capacity to provide in-person and video-remote interpretation in over 150

languages. Language Line Solutions has capacity to provide telephonic interpretation in over 240 languages. Requests for interpretation are sent directly from staff to the Vendors.

Upon initial contact, ACS's frontline CPS staff members inform clients of their legal right to free language services and ask for the client's preferred spoken language for verbal communication in order to identify a client's need for language services. A Language Identification Card is used to facilitate this process. The card is a paper card that explains the right to an interpreter in nearly 100 languages. Alternatively, staff can use the language list on the Language Line app, on their phones. If it is not possible to determine a client's primary language using the Language Identification Card, telephonic interpretation services are used.

Interpretation services are provided for all interactions between ACS staff and clients who are LEP or Deaf and/or Hard of Hearing. ACS's policy is that every effort will be made to use in-person or video-remote interpreters when interactions are expected to last longer than thirty (30) minutes or planned ahead of time. The interactions include but are not limited to:

- Interviews;
- Investigations;
- Family team conferences (FTCs); and
- Other meetings with LEP families.

Telephonic interpretation services are used for interactions expected to last less than thirty (30) minutes. Those interactions for which telephonic interpretations can be used include:

- Arranging meetings with LEP families;
- A call from an LEP individual to ACS staff;
- A visit to an ACS office, without an appointment, by an LEP individual(s).

Staff and ACS clients and advocates can send any questions, concerns or complaints about language access to ACS's language access mailbox: [language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov). In addition, ACS Language Access Contract Management sends surveys to staff who request in-person and video-remote interpretation and follows up with the vendor if there were any concerns.

### ***Language Access in Agency Communications***

ACS language access services are available for community outreach events, such as "Getting to Know ACS" presentations. "Getting to Know ACS" presentations are often hosted by or presented in collaboration with community groups, including immigrant community groups.

Moving forward, the ACS Communications Team has committed to posting at least 10 Spanish language posts on Facebook and Twitter each quarter. We are also committed to securing at least five positive media stories in ethnic media outlets (including Spanish language media outlets) each quarter.

Additionally, our goal for the next LAIP is that all press releases are translated into Spanish and posted to the website.



Below is some of the work we've already secured:

#### Press

- 1/6 - NYC Launches New Program To Help Youth At Risk Of Being Victims Of Human Trafficking - TELEMUNDO 47
- 2/18 - Young New Yorkers In Foster Care Will Have Better Opportunities To Succeed – EL DIARIO NY

#### Social Media

- 1/7/2021 NYC ACS on Twitter: "Social distancing shouldn't mean social isolation. If you or someone you know is struggling, call for help. El distanciamiento social no significa aislamiento social. Si tu, o alguien que tu conoces tiene dificultades, solicita ayuda. <https://t.co/cotcAMqgrX>" / Twitter
- 3/11/2021 NYC ACS on Twitter: @ACSNYC se enorgullece de anunciar @childrensvllg, @grahamwindham, @BBCPBronx & @goodshepherd han sido seleccionados para operar en nuestros tres Centros de Enriquecimiento Familiar que proporcionan a las familias con apoyo y servicios concretos que pueden necesitar.
- 3/11 Facebook: La votación anticipada para elecciones especiales en el Bronx empieza el 3/13 hasta el 3/21 para la elección especial de 3/23. Consulte el horario y la ubicación de su sitio de votación anticipada en <http://findmypollsite.vote.nyc> #DemocracyNYC

#### ***Plain Language***

As discussed above, the agency ACS hired a consultant to help provide plain language trainings to public-facing divisions, thereby building internal capacity to write public facing documents in plain language going forward. The consultant conducted six plain language trainings across ACS's public facing divisions, including the ACS External Affairs division, which is has primary responsibility for public-facing communications. The new ACS Language Access Policy also specifies that plain language principles should be incorporated in all public facing commonly distributed documents.

#### ***Policies and Procedures***

As discussed above, ACS has updated our Language Access Policy, which has received public comment and will be seeking interim and final approval soon. The Language Access Policy unifies and builds upon previous division-specific policies and incorporates recent developments in the law. The Policy underscores that it is ACS and provider agency staff's responsibility to inform families of their right to free interpretation and to ask their language of preference for communication. The Policy lays out which type of interpretation is suitable for different situations (e.g. in-person should be used for pre-planned, longer interactions and telephonic interpretation is suitable for shorter, unplanned interactions) and which documents must be translated. In addition, the Policy has contact information for ACS Language Access Contract Management, and how to make complaints about interpretation or translation services.

### ***Notification of Free Interpretation Signage***

ACS posts free interpretation signage at each point of contact with members of the public. We are in the process of updating the posters to the signage developed by the Mayor's Office of Immigrant Affairs. ACS provider agencies are responsible for posting signage in their offices where they interact with families.

### ***Languages Beyond the Top 10***

As stated above, ACS regularly provides services for clients in many different languages, beyond the top 10 Citywide languages. ACS's interpretation and translation vendors can accommodate requests for over 240 languages. In 2020, for example, ACS requested interpretation services for clients in almost 100 different languages.

### ***Emergency Preparedness and Response***

During an emergency, such as the COVID-19 pandemic during 2020-21, ACS works with New York City Emergency Management (NYCEM) to ensure that we devise a unified, accurate and timely message to the public. Considering New York City's ethnic and linguistic diversity, ACS makes every effort to make information available and accessible to all LEP youth and families. During an emergency, language assistance and the provision of language services are provided by ACS's language access vendors. Additionally, there are 15 ACS locations where an on-site Spanish interpreter are available in the event of an emergency. Depending on the nature of the emergency, some sites may be closed and temporarily relocated. Because ACS has contracts for in-person, video-remote and telephonic interpretation, we have a wide range of language access service media which can be used interchangeably depending on the nature of the emergency. For example, if in-person interpretation is not available or not advisable, as during the current COVID-19 pandemic, ACS and Prevention staff can use video-remote or telephonic interpretation.

## **VI. Training**

ACS Office of Immigrant Services and Language Affairs (ISLA) works closely with both of ACS's training institutes (the James Satterwhite Academy and the ACS Workforce Institute) to ensure that language access training and understanding is disseminated throughout the agency. The ACS James Satterwhite Academy focuses on establishing the foundations of fundamental practice for newly hired direct service staff and supervisors. The Workforce Institute is a partnership between ACS and the City University of New York (School of Professional Studies and the Hunter College Silberman School of Social Work) to provide ongoing professional skills development for direct service staff and supervisors at ACS and its many partner agencies across the child welfare and juvenile justice sectors.

There are more than 2,000 frontline Child Protective staff who interact regularly with families, children, and members of the public. As part of their onboarding training at the James Satterwhite Academy, these staff members receive a three-hour training that includes language access, immigration and cultural sensitivity. That training includes videos that model how to explain interpretation services to members of the public; the videos also demonstrate how to speak while working with an interpreter.

The video components of that training are posted to the internal ACS intranet site and are available for all ACS staff to view at any time.

The ISLA team supplements and reinforces these trainings by providing continuing in-person trainings to ACS and provider agency staff on language access. ISLA provides almost weekly trainings to frontline staff in ACS field offices and provider agencies, and tracks which teams have received training recently, and which teams might benefit from refreshers. In addition, to build on the initial trainings and increase capacity for training the thousands of frontline staff across ACS and provider agencies, ISLA is working closely with ACS's Workforce Institute to develop a new e-learning course on working with immigrant families, which will include a language access component. We expect the training to be finalized and rolled out in summer of 2021. Once finalized, the e-learn will be available to any ACS or provider agency staff to watch from their computer at any time, thereby greatly increasing the Agency's training capacity.

## **VII. Record Keeping and Evaluation**

As discussed previously, ACS is mandated to use the statewide database CONNECTIONS (CNNX) to track casework data for child welfare services cases. ACS has been working closely with the state agency who oversees us, OCFS, to update the way we collect language data for clients. As of the end of 2020, CNNX updated the "Language" field to clarify that it is referring to the person's "Preferred Language" and added a specific question asking about English proficiency for each individual. We anticipate that these changes will aid caseworkers in meetings clients' language needs and will help ACS ISLA in more precise record keeping on the number of LEP individuals served.

In addition, by centralizing the language access contract management in the Office of Immigrant Services and Language Affairs, the ACS office which is responsible for monitoring the efficacy of the Agency's Language Access Plan and Policy and our compliance with Local Law 30 is the same as the office that monitors the delivery and quality of our language services, better enabling the agency to meet the needs of our LEP client population. The consolidation of language services in the ISLA office means we are better able to use data from the language access contracts to drive programmatic decisions on how best to meet the language access needs of our client population. We have been able to compare information about language as tracked in our Connections database with the information we have received from our vendor, to ensure that language services are being requested in proportion to our understanding of our LEP client language needs. In addition, ACS ISLA has already started sending surveys to all ACS and provider agency staff after their interpretation sessions and expanding and building upon our current feedback mechanisms is one of our top goals for the next three years.

## **VIII. Resource Analysis and Planning**

As discussed above, ACS has consolidated our language access work into the ACS Office of Immigrant Services and Language Affairs. ACS has hired a fulltime, dedicated Language Access Contract Manager and also added team members from the NYC ReServe program and Americorps VISTA, who provide support to ACS's language access work. ISLA also works closely with leadership in every ACS division to ensure language access best practices are incorporated into all our work with families. In addition, ISLA benefits from the outstanding support of the language access team at Mayor's Office of Immigrant Affairs, who provides invaluable ongoing training, technical support and materials for the ISLA team, which is then passed onto the Agency.

Other areas of collaboration include:

- Citywide Materials: ACS will use standardized signage and materials provided by the Mayor’s Office for Immigrant Affairs;
- Citywide Services: ACS will obtain translation and interpretation contracting services through contracts held by DCAS;
- ACS Office of Advocacy and 311: ACS Office of Advocacy receives all 311 language access complaints and other language access complaints from the public through walk-ins and phone calls, and works with ISLA to resolve those complaints;
- ACS’s internal training institutes, including the James Satterwhite Academy and the Workforce Institute;
- ACS’s HR department, who will work toward hiring of bilingual staff;
- ACS’s Communications team, to ensure outreach is being made to ethnic media and press releases and social media are available in translation.

As discussed above, ACS invests heavily in our language access services. In the latest full contract year (2019-2020), ACS spent \$751,472.40 on telephonic interpretation services, \$420,247.72 on in-person interpretation services; \$284,221.72 on ASL interpretation, \$236,155.19 on onsite Spanish interpretation and \$100,478.52 on written translation services.

## **IX. Outreach and Public Awareness of Language Access Services**

ACS recognizes the importance of outreach and public awareness of language access services, and we will continue to build on ongoing outreach initiatives. The Office of Immigrant Services and Language Affairs now sits within the Division of External Affairs, whose goal is public awareness. This restructuring allows the agency to keep language access considerations front and center in our public awareness work. ISLA collaborates regularly with our Communications and Marketing teams.

Our goal is to ensure that the youth, families and communities ACS serves are aware of their right to free language services. ACS Office of Immigrant Services and Language Affairs (ISLA) meets regularly with community advocates and explains ACS’s language access services and the language access complaint system to the advocate community directly. For example, the ACS Office of Immigrant Services and Language Affairs chairs the “Supporting Immigrant Children and Families Working Group,” which is made up of over 100 community child welfare advocates and ACS staff and meets on a semi-annual basis. Language access rights and concerns are regularly discussed in these meetings. This collaborative working group also fosters direct relationships between ISLA and advocates, and advocates know to reach out directly to ISLA on any individual case needs concerning immigration and/or language access or for general questions about ACS language access policies and procedures.

Furthermore, as discussed above, ISLA conducts regular trainings on language access at ACS and our provider agency offices throughout the city. In addition, language access services are discussed in ACS’s “Getting to Know ACS” presentations, which are given to community groups and public sector partners across the city to help explain the child welfare, juvenile justice and early child care programs and policies. The language access mailbox ([language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov)), where clients can make any language access inquiry or complaint, is listed on the ACS website.

## **X. Language Access Complaints**

Members of the public can submit language access complaints through multiple media: by calling 311, reaching out the ACS Office of Advocacy (by phone, email or walk in) or by directly emailing the dedicated ACS Language Access mailbox (language.access@acs.nyc.gov), which is listed on our website (<https://www1.nyc.gov/site/acs/about/immigrant-services.page>). Language access questions are then routed to the relevant programmatic division and the Office of Immigrant Services and Language Affairs, who look into the complaint and respond accordingly. In the next three years, one of the Agency’s goals is to more systematically and proactively elicit feedback (including complaints) directly from clients and advocates, to help support our quality assurance for language access services.

#### **XI. Implementation Plan Logistics**

<b>Language access goal</b>	<b>Milestones</b>	<b>Responsible Staff</b>	<b>Deadline</b>
Goal 1	ACS training institutes (the James Satterwhite Academy and the Workforce Institute) will update their trainings to reflect the new ACS Language Access Policy.	James Satterwhite Academy and the Workforce Institute	December 2021
Goal 1	Every ACS public-facing division and provider agency will receive training and/or guidance on the new Language Access Policy and its implications for their work.	ACS ISLA	December 2023
Goal 1	ACS has updated and distributed division- and provider agency-specific Language Access Desk Aids with information about the new Language Access Policy and its implications for their work with LEP clients.	ACS ISLA	Annually, starting by December 2021
Goal 2	ACS has developed a system to request and receive feedback from ACS and provider agency staff for all in-person and video-remote interpretation sessions.	ACS ISLA	December 2021
Goal 2	ACS has developed a system to request and receive feedback from ACS clients and advocates about interpretation sessions.	ACS ISLA	December 2022

Goal 2	ACS regularly reviews feedback from interpretation sessions survey and analyzes trends to promote quality assurance with language access vendors.	ACS ISLA	December 2021
Goal 2	ACS has assessed the ability of the Agency to increase the number of bilingual staff through recruitment, the use of the selective certification hiring process and developing a certification system by which ACS staff can be certified for fluency in languages other than English and voluntarily provide services directly in those languages, rather than needing to use a third-party interpreter.	ACS ISLA and HR	December 2022
Goal 3	ACS has presented to provider agencies and community groups about our language access services and ACS's language access program, specifically on families' rights to free interpretation services, that requesting services will not prejudice their cases, and how and where to provide feedback on their language access experience.	ACS ISLA	December 2021, and ongoing
Goal 3	ACS ISLA has met with Parent Advisory Council and Youth Leadership Council to discuss ACS's language access work. ACS ISLA has received feedback from the councils and used the feedback to inform service delivery.	ACS ISLA	December 2022, and ongoing

Goal 3	All ACS public access offices have up-to-date free interpretation signage that is easily visible for LEP families upon entering the space.	ACS ISLA, the Division of External Affairs, the Division of Child Protection and the Division of Juvenile Justice	March 2022
Goal 3	ACS Communications Team has posted at least 10 Spanish language posts on Facebook and Twitter each quarter.	ACS Communications Team, ACS ISLA	December 2021
Goal 3	ACS Communications Team has secured 5 positive media stories in ethnic media outlets (including Spanish language media outlets) each quarter.	ACS Communications Team, ACS ISLA	December 2022
Goal 3	All ACS press releases are translated into Spanish and posted to the public website.	ACS Communications Team, ACS ISLA	December 2021

ACS will update this Language Access Implementation Plan every three years and will post it on its website.