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# Language Access Policy & Implementation Plan

January 1, 2009

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**DEPARTMENT FOR THE AGING (DFTA) LANGUAGE ACCESS POLICY AND  
IMPLEMENTATION PLAN**

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

### **a. Agency Mission**

The New York City Department for the Aging (DFTA or the Department or Agency) is the lead Mayoral agency addressing public policy and service issues affecting elderly residents of New York City. Through its community partners and direct service units DFTA serves more than 300,000 older New Yorkers. DFTA is also the largest agency in the Federal network of Area Agencies on Aging (AAA). In this capacity, the Department represents the concerns of urban centers on a national scale and advocates on legislative, regulatory, and socio-economic issues that affect older adults.

DFTA's mission is to work for the empowerment, independence, dignity and quality of life of New York City's diverse older adults and for the support of their families through advocacy, education, and the coordination and delivery of services.

DFTA's various programs and initiatives pursue the following strategic goals:

1. To foster independence and individual choices, eradicate ageism and promote opportunities for older people to share their leadership, knowledge, and skills;
2. To inform and educate the general public about aging issues, including services, supports, and opportunities for older New Yorkers and their families;
3. To be a catalyst for increased resources to enhance and expand programs and services for older New Yorkers;
4. To ensure the provision of quality services fairly and equitably to older New Yorkers;
5. To enhance and expand effective, productive partnerships with consumers, advocates, private and public organizations; and
6. To recognize the value of all staff and encourage their creativity in building the Department's capacity for continuous improvement.

### **b. Direct Services Offered by the Department for the Aging**

DFTA's core services of case management, home delivered meals, and congregate programs for older adults (senior center services) are provided through community-based organizations under contract. In addition, the Department provides the following direct services:

### ***Senior Resource Center***

The Department's Senior Resource Center offers assistance to walk-in clients who are inquiring about or applying for the Senior Center Rent Increase Exemption Program (SCRIE), Home Energy Assistance Program (HEAP), the Weatherization Referral and Packaging Program (WRAP), Medicare Part D and other Medicare-related programs. It also refers walk-ins to DFTA's other direct service units on different floors: the Elderly Crime Victims Resource Center (ECVRC), the Grandparent Resource Center (GRC), the Alzheimer's and Caregivers Resource Center (ACRC). The Senior Resource Center sees an average walk-in volume of 70 persons daily. It does not handle telephone inquiries and requests for assistance which are routed through 311 directly to DFTA's direct service units (see below). The following Units comprise the Senior Resource Center:

- **The Senior Citizen Rent Increase Exemption Program (SCRIE)** assists qualified older adults age 62 or older to remain in rent regulated apartments by authorizing exemptions from future increases to their monthly rent.
- **The Home Energy Assistance Program (HEAP)** helps low-income homeowners and renters pay for utility and fuel costs, repairs, heat-related equipment, and temporary relocation through a one-time yearly grant. The Department educates the aging network, public officials, and utility companies about HEAP and its benefits. While administered through the Human Resources Administration, the Department conducts outreach for the program to seniors.
- **The Weatherization Referral and Packaging Program (WRAP)** is part of the HEAP program and is dedicated to assisting individuals with weatherization needs. WRAP enables low-income clients to receive complete weatherization and weatherization-related home repairs and support services. The program provides needs assessment home visits and ongoing technical support. WRAP's Housing Guide provides information on affordable housing, utility assistance and home repairs. WRAP collaborates with the NYS Division of Housing and Community Renewal (DHCR) to weatherize homes of eligible DHCR wait list clients. WRAP also coordinates the delivery and installation of air conditioners to eligible older adults that do not have working air conditioners.
- Medicare Part D assistance is provided by DFTA's **Health Insurance Information Counseling and Assistance Program (HIICAP)**. HIICAP conducts public outreach presentations for the elderly, community partners and other groups on Medicare, Medigap, private industry health insurance and long term care planning. HIICAP also distributes the "Complete Guide to Health Care Coverage for Older New Yorkers."

### ***Senior Employment Services Unit***

The **Senior Employment Services Unit (SESU)** provides training for positions in data processing, electronic offices, customer services, food services, security services and the home health field to older persons seeking to re-enter or advance in the workforce. It also

provides job search skills workshops, career advisement, job fairs, community placement and assistance with permanent employment. Trainees must be eligible for the Senior Community Service Employment Program (Title V). The SESU continues to expand partnerships with public and private organizations that provide on-the-job skills training and employment opportunities for older adults.

The training center is in Lower Manhattan at the Department's 220 Church Street location, Room 132.

#### ***Grandparent Caregiver Resource Center***

The **Grandparent Resource Center (GRC)** provides information, referral and counseling assistance to grandparents who have primary responsibility for their grandchildren (or other older kin caring dependent children) due to parental unavailability. In addition, the GRC has built a network of grandparent support groups across the city, and provides training to grandparents on self-advocacy and empowerment, support group start-up, and caregiving issues, as well as training and presentations to community-based groups and City government employees on grandparent caregiver needs. The GRC continues to increase its outreach to diverse communities including Latino, African, Caribbean and Russian grandparent-headed families. The GRC also works with intergenerational programs and explores recreational opportunities for grandparents' families.

#### ***Elderly Crime Victims Resource Center***

The Department provides counseling and supportive services to elderly victims of elder abuse or crime in New York City through its **Elderly Crime Victims Resource Center (ECVRC)**. It also provides training to groups that work with older adults on how to identify signs of abuse and provide intervention. The ECVRC works with its partners – including the Mayor's Office to Combat Domestic Violence and the Brooklyn Family Justice Center as well as community partners – to ensure that older victims receive crisis intervention, counseling, advocacy, information and assistance, emergency financial assistance, security device installation, and legal services. DFTA is also an active member of the Elder Abuse Prevention Network, comprised of non-profit organizations, government agencies, law enforcement personnel, district attorneys, academic institutions and private sector groups. The Network works to identify service gaps and improve coordination, collaboration and information sharing among the various agencies and systems involved in elder abuse prevention and services.

#### ***Alzheimer's and Caregiver Resource Center***

The **Alzheimer's and Caregivers Resource Center** provides caregivers, professionals, and the general public with information, referral, consultations, technical assistance, trainings, and other caregiver support services. The Alzheimer's Resource Center provides both phone and walk-in assistance to persons with caregiving issues.

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

### **a. Goals of Agency's Language Access Plan**

New York City's older adult population is ethnically, culturally, and economically diverse, with broad and wide-ranging service needs. The Department's mission recognizes this diversity and the agency's responsibility to ensure equitable access and service provision to older persons of every ethnic, racial, religious, cultural and sexual orientation.

DFTA's goal for its Language Access Initiative is to ensure that LEP customers of its direct services units receive free language and culturally-appropriate assistance. A customer is considered LEP (Limited English Proficiency) when s/he is not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with DFTA staff.

The Department will facilitate effective and accurate communication for LEP consumers by:

1. Making appropriate interpretation services available;
2. Translating essential documents to ensure that LEP individuals understand the services, benefits and entitlements available and how to access them; and
3. Providing adequate notice that language assistance is available. Such assistance will significantly reduce the linguistic barriers to service faced by LEP individuals.

The Department's plan for implementation will ensure that the agency is in compliance with Executive Order 120. To supplement this initiative, DFTA will continue to promote the linguistic and cultural competency of its contracted agencies providing DFTA-funded services.

### **b. Success of Plan Implementation**

The Department will designate a permanent Language Access Coordinator (LAC) to be housed within the Department's Office of Public Affairs. The LAC will work internally with agency staff to ensure milestones are met in a timely manner. The Plan will be updated annually to ensure that the Agency's response to the linguistic needs of its customers and its outreach strategies to under-served linguistic groups remains effective. *(Please see Record Keeping and Evaluation Section).*

### c. Summary of 2007-2009 DFTA Initiatives to Improve Language Access

- Upon entry to the Department's floors at 2 Lafayette Street,, visitors are greeted by DFTA's mission statement in four languages, Spanish, Chinese Russian and English, as well as welcoming photographs of seniors highlighting the diversity of the City's aging population.
- The Department translated its Modernization Newsletters into three languages before distributing them its service population.
- The Department's Caregiver website <http://www.nyc.gov/html/caregiver/> is now accessible in English, Russian, Chinese and Spanish.
- The Alzheimer's and Caregivers Resource Unit created a 4-part CD--*Understanding Alzheimer's' Disease*--in English, Spanish, Chinese, Russian, Korean and Bengali. These languages were chosen in response to feedback from DFTA's contracted caregiver programs and census data. For example, DFTA's large caregiver program in Queens reported the predominance of Bengali immigrants among southeast Asians served by their program. Census data confirms that Bengalis constitute a significant percentage of southeast Asian immigrants. The CD will be available on DFTA's Caregivers website in 2009.
- For the past four years, DFTA's annual Mayoral Conference on Alzheimer's Disease has been providing simultaneous interpretation of its general session and select workshops in selected languages. In 2008, interpretation was provided in Mandarin-Chinese and Spanish.
- A Russian-speaking staff person in DFTA's Grandparents' Resource Center is now conducting monthly support group meetings in Russian for 5-6 Russian-speaking grandparents. In addition, a Russian speaking staff person from the Grandparent Resource Center provides interpretation of the Aging in New York Fund's *It's My Money* workshop.
- The Department has 41 Medicare Part D information and enrollment centers, providing counseling and enrollment assistance pertaining to the Medicare's prescription drug benefit program. Bilingual staff provide assistance in the languages spoken by the communities served. Collectively, the centers have capability in 24 languages.
- The Department's contract language holds provider agencies responsible for ensuring they have the capability to meet the linguistic and cultural needs of seniors in their communities.
- The Department offers annual full-day cultural competency training to senior center staff employed by contract agencies. In 2008, DFTA developed new required

training modules for contract agency case management staff that includes cultural competency.

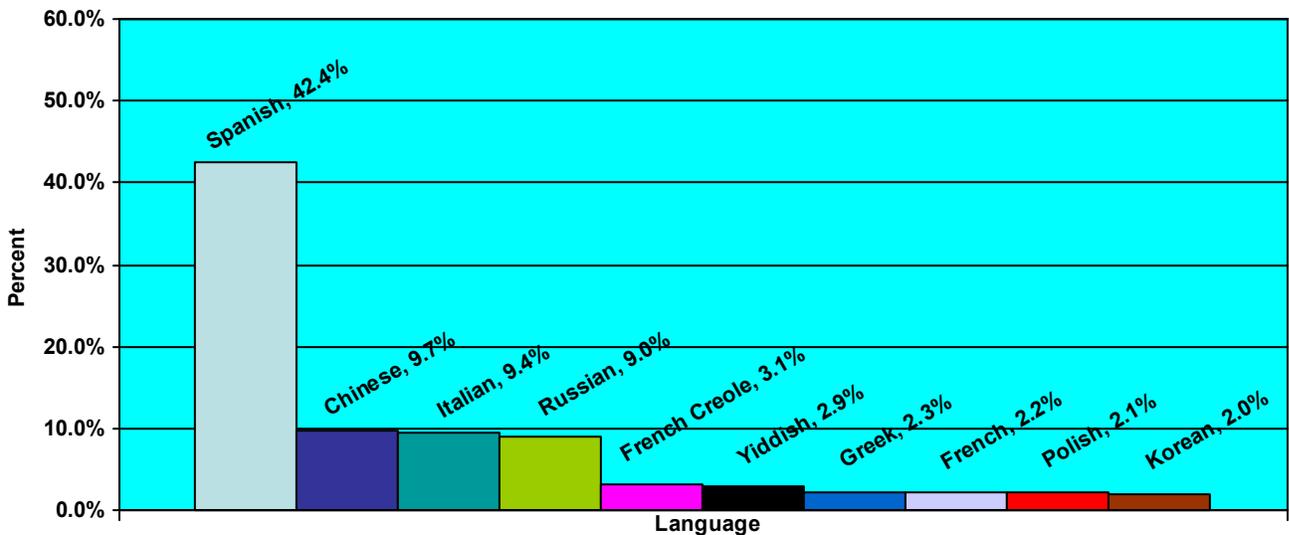
### **III. LEP Population Assessment**

#### **a. Department LEP Languages**

DFTA has analyzed the current and future needs of NYC’s elderly population, utilizing (1) the 2007 American Community Survey (ACS), (2) the 2000 Census, and (3) population projection trends through 2030. According to ACS 2007 census data, the most frequent non-English languages spoken in NYC by LEP older adults (as defined as 60+) are: **Spanish, Chinese, Italian, Russian, French Creole, and Yiddish.**

**The Department will initially plan to provide services in these six languages. Language targets may change based on ongoing “Four Factor Analysis” (see below).**

#### **Language Spoken at Home by Older New Yorkers Ages 60 & over**



#### **b. Federal Department of Justice “Four-Factor Analysis”**

##### **Factor 1 – Demographic Analysis:**

DFTA will continue to review and analyze ACS data, census data and new projections from the Department of City Planning to identify changes in the proportion of LEP persons 60 years of age and older living in New York City. This information will enable us to determine populations we may be under-serving and to develop outreach strategies.

##### **Factor 2 – Frequency of Agency Contact with LEP individuals:**

DFTA obtained the following information from its five direct service units on: # of non-English speaking individuals utilizing their services either as walk-ins or callers during a

one month period; break-down of LEP population by frequency of language request during this same period; languages requests received only occasionally over the past six months.

Name of Center	# of Users	# of LEP Users	Language Need Break-Down	Additional Language Needs *
Senior Resource Center	1,120	312	20% Spanish 6.7%Chinese (Cantonese) 0.9% Russian 0.2% French Creole 0.08% Albanian 0.08% Japanese	French Creole Russian Albanian Japanese
Senior Employment Services	120	40	Spanish – 22 Chinese – 11 Korean – 3 Russian – 3 French Creole-1	Korean Russian French-Creole
Alzheimer’s and Caregivers Resource Center	496	12	Spanish-10 Cantonese -2	None
Elder Abuse Resource Center	300 (including general calls)	15	Spanish -10 Chinese – 2 Russian -2 Haitian-Creole-1	Polish Korean Italian
Grandparents Resource Center	55	7	Spanish-3 Russian-4	None

*\*Needs encountered only on an occasional basis.*

This preliminary data indicates that customers primarily need assistance in Spanish, Chinese and Russian. Need for assistance in these languages is currently met by bilingual staff of the Units involved. Our direct service programs very occasionally encounter other requests, including Hindi, Haitian Creole, Korean and some African dialects. These requests have been met wherever possible by non-Unit bilingual staff or by calling a contract program for assistance.

Factor 3: Importance of the benefit, service, information or encounter to the LEP person. Our Elder Abuse Resource Center, Alzheimer’s and Caregivers Resource Center and Grandparents Resource Center provide case assistance and counseling as well as information; our Senior Resource Center provides direct assistance with SCRIE applications and counseling on Medicare Part D. Our Senior Employment Services Unit provides training and makes employment opportunities available. Each of these units provide critical services.

Factor 4: Resources designated for language assistance services.

Current resources include bilingual staff of DFTA's Units. This resource will be enhanced through a contract with the current vendor contracted by DoITT- Language Line Services, Inc.- for telephone interpretation and document translation services. The agency will also strengthen its Volunteer Language Bank by formalizing procedures for recruiting volunteers, requesting Language Bank services and tracking service use.

#### **IV. Implementation Plan Logistics**

**a. Key implementation staff and roles:**

- Deputy Commissioner for External Affairs
  - Oversight responsibility for implementation of Language Access Policy/coordination with DCAS
- Director, Office of Public Affairs
  - Supervise Language Access Coordinator
  - Supervise Senior Resource Center and Outreach Staff
- Assistant Commissioner, Bureau of Long Term Care and Active Aging
  - Supervise Alzheimer's and Caregivers Resource Center, Grandparents Resource Center and Senior Employment Services Unit
- Assistant Commissioner for Administration
  - Supervise DFTA's General Services Unit on procurement and management of Language Line contract and signage placement.
- Director of Human Resources
  - Supervise Volunteer Language Bank Coordinator
- Director of Center for Organization Development and Training
  - Coordinate with Mayor's Office of Operations on implementation of citywide training curricula
  - Develop/conduct trainings for direct service staff/supervisors
- Language Access Coordinator
  - Liase with Mayor's Office and Mayor's Customer Service Group on language access/customer service policy implementation and reporting on milestones.
  - Monitor use of language interpretation services (Language Line/Volunteer Language Bank) to identify new needs and ensure suitability of Language Line contract to DFTA needs
  - Develop communication materials promoting DFTA's Language Access capability
  - Review English-language documents for "plain language" before translation
  - Report to Mayor's Office of Operations, DFTA Executive Staff on Language Access Indicators
  - Update Language Access Plan annually
- Volunteer Language Bank Coordinator

- Develop system for determining interest in serving on Language Bank through annual surveys of staff that will include questions to assess proficiency.
- Develop Language Bank policy and procedures, including supervisory sign-off and documentation of service.
- Develop a reward program for persons who provided services during a specified timeframe.
- Coordinate with Director of Organizational Development and Training on orientation/training for Bank volunteers.

**b. Milestones and Timeline.**

DFTA will implement its Language Access Plan over a period of two years.

Milestone: Present Language Access Plan to Executive Staff /DFTA's Senior Advisory Board. April 1 - July 1 2009.

Milestone: Orient/train front line staff of direct service units and their supervisors on DFTA's Language Access Policy and implementation procedures, with overview of cultural competency requirements. April 1 – July 1 2009.

Milestone: Put contract with Language Line in place. Hang Language Line posters advising visitors that interpretation services are available in registration areas of Senior Resource Center and Senior Employment Services Unit; distribute I Speak cards to staff of all direct service units. Begin Language Line training of front-line staff on headsets use and Language Line policies/procedures. April 1 – July 1, 2009).

Milestone: Post multi-lingual NYC Welcome Signs in registration areas of Senior Resource Center and Senior Employment Services Unit. Signs will be in English, Russian, Chinese and Spanish . April 1 – July 1, 2009.

Milestone: Implement data collection and reporting in DFTA's five direct service units - Senior Resource Center, Senior Employment Services Unit, Elderly Crime Victims Resource Center, Alzheimer's and Caregivers Resource Center and Grandparent Resource Center. April 1 – July 1, 2009.

Milestone: Present Intergovernmental and Community Outreach staff with talking points on DFTA's Language Access Policy and enhanced language assistance services. Direct staff to make presentations at meetings/events they attend (community boards, interagency councils, other public forums). July 1- October 1, 2009.

Milestone: Survey current staff on interest in joining DFTA's Volunteer Language Bank and their degree of proficiency. July 1 – October 1, 2009.

Milestone: Develop Policies and Procedures for Language Bank requests/documentation. July 1 – October 1, 2009.

Milestone: Post multilingual directional signage to Senior Resource Center in lobby of 2 Lafayette Street. October 1 2009 – January 1 2010.

Milestone: Complete analysis of DFTA’s website and plans for revising, including plan for making key information accessible in identified languages for compliance with EO 120. October 1 2009 - January 1 2010

Milestone: Translate GRC Brochure and Benefits at a Glance into Spanish, Chinese and Russian. October 1 2009 - January 1 2010

Milestone: Develop Tip Sheet for Language Bank Volunteers and provide orientation/training to volunteers. October 1 2009 – January 1, 2010

Milestone: Analyze data from Language Line, Volunteer Language Bank and Unit reporting to determine additional languages DFTA will focus translation services on (assuming that there continues to be little indication of need for materials in Italian and Yiddish). Update Plan to reflect new analysis. January 1 – March 1 2010

Milestone: Hold annual meeting to orient/train *new* front-line staff and supervisors in DFTA’s direct services units. March 1- June 1 2010.

Milestone: Translate DFTA Brochure and other essential documents into identified six languages. Ongoing between January 1 2010 – January 1 2011.

Milestone: Update Website to comply with Executive Order 120. Ongoing between January 1, 2010 – January 1 2011.

## **V. Service Provision Plan**

### **a. Interpretation Services**

#### ***i. Identifying customers’ language need***

Most walk-ins access the Department’s direct services through the Senior Resource Center and the Senior Employment Services Unit. However all Units will take the following steps in providing service to walk-in customers:

When a walk-in customer appears to be LEP, front-line staff will attempt to ascertain the primary language spoken by the customer.

- If a customer doesn’t verbally identify his/her primary language, staff members will ask “What language do you speak at home?”

- If verbal communication is unsuccessful, staff will use a Language Identification Card to facilitate communication.
  - Language Identification Cards will be available in all DFTA direct service units: the Senior Resource Center, the Alzheimer's and Caregivers Resource Center, the Elderly Crime Victims Resource Center, the Grandparent Resource Center and the Senior Employment Services Unit.

Signs announcing the availability of free interpreter services (with translations in the six key languages) will be posted in the Senior Resource Center and the Senior Employment Services Unit.

Callers transferred to direct service units or accessing the unit through other means will also be asked their preferred language for communication if it appears they are LEP. People who appear to need non-English assistance will be helped by a bilingual staff person in the Unit or Language Line interpreter services will be accessed.

### ***ii. Providing interpreter services: Language Line and Volunteer Language Bank***

Direct service units of the Department will use the citywide contract for **Language Line** when unit staff do not have capability in the language needed. When an applicant/customer needs an interpreter, front-line staff will assign the customer to a bilingual staff person located in the unit. If an appropriate bilingual worker is not available, Language Line will be used.

DFTA's Resource Center will have six telephones to access Language Line with speaker capability and/or headsets. DFTA's Alzheimer's Resource Center and Elderly Crime Victims Resource Center will each have a telephone equipped for Language Line. DFTA's SESU will have three telephones dedicated to Language Line.

### ***Volunteer Language Bank***

The Department's Volunteer Language Bank Coordinator (VLBC, located within the Human Resources Unit) will maintain a current list of staff persons with bilingual capability that are willing to serve as interpreters, in cases where assistance is not available from Language Line or not available within a reasonable length of time, and/or as reviewers of documents translated by Language Line.

Volunteers will receive a tip sheet developed by the VLBC and an orientation on principles of interpretation, including confidentiality, impartiality, and fidelity to speaker's words and intent and on basic translation expectations. New Volunteer Language Bank members will attend the annual training for new front-line direct service staff on DFTA's Language Access Policy and Procedures provided by the Department's Center for Organizational Development and Training.

***iii. Current Status of Interpreter Services and Anticipated Volume of Interpreter Need***

Currently, all direct service units rely on bilingual staff of the unit to assist LEP customers. Where the unit does not have capability in the needed language, a request is made to appropriate staff in other DFTA units and/or to community partners that serve a similar population and have staff with the requisite skills. The utilization of Language Line will replace this current ad hoc process.

*Senior Resource Center*

The most common requests to the Senior Resource Center for language assistance are from Spanish, Russian and Chinese-speaking LEP individuals. The majority of assistance needs are related to DFTA's SCRIE Unit. The Unit has staff capability in Spanish and Chinese. Anticipated volume of Interpreter need when DFTA formalizes its Language Access Plan is an average of 200 monthly.

*Alzheimer's and Caregiver Resource Center* has bilingual staff proficient in Spanish, Chinese, Russian, Mandarin, Cantonese, Polish, Italian and Hungarian. This Center sees approximately 1 LEP walk-in monthly and receives approximately 25 phone inquiries monthly from persons who need interpreter services. The most frequent LEP request is for Spanish. Currently, when Center staff cannot provide services in the language needed by the speaker, the unit calls on other DFTA staff or telephones a community partner that has staff with the requisite skills.

*Grandparent Resource Center*

This Unit provides assistance in Spanish and Russian. On average, interpretive services are needed in Spanish or Russian eight times weekly. The unit's outreach to ethnic communities is based on staff cultural and linguistic competency. Thus, a Russian-speaking staff person has done extensive outreach to Russian communities in Brooklyn, and has been able to provide assistance to a Russian-speaking grandparent caregiver support group on a monthly basis.

*Elderly Crime Victims Resource Center*

The ECVRC requires interpretation assistance on average eight times weekly for Spanish, one to five times monthly for Russian, and one to three times monthly for Chinese. In addition to Spanish, Chinese and Russian, there is occasional need for assistance for Polish, Italian and Hindi.

*Senior Employment Services Unit*

Languages most often spoken by persons requesting services from SES are English, Spanish and Chinese (Mandarin and Cantonese). Staff members have capability in Italian, Spanish and Chinese. Staff members provide assistance in these languages on a daily basis.

Anticipated demand for interpreter services based on current assistance provided:

- Request for assistance in Spanish: approximately 40 per month.

- Requests for assistance in Chinese: approximately 30 per month.
- Requests for assistance in Korean: approximately 20 per month.
- Requests for assistance in other languages: approximately 10 per month.

***Documentation of Interpreter Services***

Each direct service unit will develop procedures to document LEP requests by language (*please see Record Keeping and Evaluation Section for details*) for reporting and quality assurance purposes. Documentation procedures will and may vary based on type of service provided and staff function.

**b. Translation Services**

***i. Essential public documents***

Below is a listing of the Department for the Aging’s essential public documents informing seniors and their families about the department’s services and other issues of high importance to seniors.

UNIT	ESSENTIAL DOCUMENTS
Public Affairs	DFTA Brochure*
Public Affairs	Benefits at a Glance
SCRIE	SCRIE Brochure
Alzheimer’s and Caregivers Resource Center	Understanding Alzheimer's
Grandparents Resource Center.	A Helping Hand (brochure)
Crime Victims Resource Center	Elder Abuse Brochure*
Senior Employment	General Employment Brochure
Bureau of Senior Centers	Senior Center Bill of Rights (for contracted programs) **
Bureau of Long Term Care and Active Aging	Client Rights (for contracted programs) **

\*These brochures are currently being revised.

\*\*These documents are used by contracted programs, which are not covered by this initial Language Access Policy. However, The Department believes that these two Department-generated and required documents are essential to a culturally competent service system.

Currently, the Department contracts with Language Services Associates (LSA) for the translation of any necessary documents. Each unit is responsible for the translation of its own materials and works directly with the Department’s General Services Unit to achieve its translation goals. Beginning with Plan implementation, the Department will use the DoITT citywide contract for Language Line for the translation of the above listed essential documents. The Language Access Coordinator will coordinate with General Services to have all essential documents translated in a timely manner.

### **Quality Assurance for Translated Materials**

Members of DFTA's Volunteer Language Bank will check the accuracy, tone and plain language use of translated documents upon a request to their supervisor from the Language Access Coordinator. The Volunteer Language Bank Coordinator will keep a record of their service.

### ***ii. Incorporation of plain language guidelines and standards***

The Language Access Coordinator will review all materials for translation and edit, where necessary, in accordance with "*Easy-to-Read NYC: Guidelines for Clear and Effective Communication*" ([www.nyc.gov/easytoread](http://www.nyc.gov/easytoread)).

### ***iii. Website Translation***

DFTA has begun an overall review of its website, which includes information about senior programs, services and resources and a calendar of events, as well as guidance on issues such as caregiving, healthy nutrition, etc. As part of this review process to streamline our website and make it more user-friendly, the Department will consider whether to translate essential items for LEP individuals or whether to create links on our homepage that will direct LEP who speak one of our designated languages to a dedicated page in their language. We will also incorporate any directives from the Mayor's Office and/or the Department of Information Technology and Telecommunications as they develop an online citywide language access policy

### **c. Signage at Public Service Centers**

The Department will:

- Post signs that informs customers in twenty-two languages they can receive free interpretation services in DFTA's two largest walk-in centers, the Senior Resources Center and Senior Employment Services Unit. The signs are available from Language Line Services.
- Post NYC standardized 24x36 inch multilingual welcome signs in each of our five direct service units identifying the types of assistance provided.
- Negotiate with DCAS to have a sign in the six designated languages directing seniors visiting the Senior Resource Center to the appropriate floor. Sign will be translated by Language Line.

### **d. Outreach /Public Awareness of language assistance services**

- Promote the availability of language assistance and services in DFTA Newsletter, all brochures and the Department's website.
- Instruct DFTA's Outreach and intergovernmental staff to announce the availability of language assistance at DFTA's direct service units for LEP persons.

- Include translated brochures in all packets distributed at health and resource fairs and to community groups.
- Enlist Senior Advisory Board is promoting DFTA's strengthened capability to provide language assistance services and to outreach to unserved linguistic groups.

## **VI. Training**

The Department for the Aging (DFTA) will require staff to be knowledgeable and trained on new Language Access policies and procedures. Through the Department's Center for Organization Development and Training, it will provide/arrange:

- A one-time briefing for executive staff and DFTA's Senior Advisory Committee on the new Language Access policy and plan.
- A training for current front-line staff of direct service units and their supervisors on the Language Access Policy and Implementation Plan., including identification of customer's primary language, use of tools such as Language Identification cards, and general principles of cultural competency. The training will also include LEP data collection and reporting.
- An annual training for new front-line staff of direct service units and their supervisors on the Language Access Policy and Implementation Plan, including general principles of cultural competency

In addition, DFTA's General Services Unit and Language Access coordinator will arrange for training by Language Line on their services and how to use Language Line equipment. This one-time Language Line training will be for current front-line staff and their supervisors. Subsequent on-the-job training of new front-line staff will be provided by Unit supervisors.

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

### ***a. Maintenance of Records of Language Services Provided by Agency***

The Department for the Aging (DFTA) will identify and develop mechanisms to comply with Executive Order 120's record keeping and evaluation requirements. Each direct service unit, (Senior Resource Center including SCRIE, HEAP, WRAP, Medicare Part D; Senior Employment Services Unit; Grandparent Resource Center; Elderly Crime Victims Resource Center and the Alzheimer's and Caregivers Resource Center) will be required to develop a formal tracking system to document monthly the following:

- Number of walk-in customer requests for interpretation services by language requested.
- Number of walk-in customer requests for interpretation services provided by Language Line.
- Number of walk-in customer requests for interpretation services provided by DFTA's VolunteerLanguage Bank.
- Number of walk-in customer requests for interpretation services provided by Unit staff.

- Number of callers requesting interpretation services, by language requested.
- Number of callers with assistance needs met by unit staff.
- Number of callers with assistance needs by Language Line.
- Number of callers with assistance needs met by DFTA's Volunteer Language Bank.
- Number of callers/walk-in customers whose language assistance request could not be met.

Based on the aggregate data gathered from each direct service unit and Language Line invoices and the Department's Language Access Coordinator will provide quarterly reports to the Mayor's Office and to DFTA's Executive staff on:

- The number of limited English-proficient individuals served, disaggregated by primary language and type of language assistance needed.
- The number of bilingual interpreter staff providing services, disaggregated by language.
- A list of documents that have been accurately translated and disseminated.

**c. Compliance with Executive Order 120:**

Compliance with Executive Order 120 will be ensured through the Language Coordinator, who will review the Department's Language Access Plan annually for the following:

- Changes in the LEP language groups in the 60+ population of New York City.
- Changes in the LEP language groups population served by DFTA in terms of frequency of contact.
- Changes in resources including new technologies, additional resources and budget availability.
- Effectiveness of existing language assistance to LEP individuals.
- Staff knowledge of the agency's Language Assistance Plan and how to implement it.
- Whether identified sources for assistance are still available.
- Changed language abilities available among staff.
- Need to add ability in additional languages as a consideration in hiring staff.
- Need to contract for additional interpreter services.
- Feedback from the community at-large and from minority language groups and persons (e.g. complaints filed because of language access problems).

**VIII. Resource Analysis and Planning**

Resources to implement DFTA's Language Access Policy will include:

- The Language skills of the Department's staff in each direct service unit.
- DFTA staff volunteers for the agency's Voluntary Language Bank. Volunteers will provide review services for translated documents and assist with interpretation when Language Line cannot be utilized.

- A Language Line contract replacing DFTA's current contract with Language Services Associates. Language Line costs will be closely monitored
- DFTA's IT staff will assist in the development of documentation/reporting systems when so requested.
- DFTA's Organizational Development and Training Center will organize and host trainings.
- Materials developed by the City to assist agencies in Language Access implementation.