

Annual Report on Implementation of Language Access

**Department of Social Services/
Human Resources Administration,
Department of Homeless Services**

4/3/2019



This annual report provides an update on the agency's implementation of its Language Access Implementation Plan, as required by Local Law 30 (2017). The report covers activity during calendar year 2018.

This report also addresses updates for agencies covered by Local Law 73 (2003).

Section 1: Agency Information

Agency name	Department of Social Services (DSS)/ Human Resources Administration (HRA), Department of Homeless Services (DHS)
Name of the agency's Language Access Coordinator (LAC) and all office titles held by this individual.	Marah Rhoades, Deputy Commissioner, Office of Advocacy and Outreach
Link to the agency's Language Access Implementation Plan (LAIP) posted on the agency's website.	HRA: Click here or see http://bit.ly/HRALAIP2018 DHS: Click here or see http://bit.ly/DHSLAIP2018
Year the LAIP was last updated	2018

Section 2: Agency language access policy and goals

Describe your agency's language access policy and how it is communicated to staff.

The New York City Department of Social Services (DSS), along with the Human Resources Administration (HRA) and the Department of Homeless Services (DHS) are committed to serving all New Yorkers. The Agencies have made a clear and firm commitment to providing both interpretation and translation services for our limited English proficient (LEP) clients.

DSS has an overarching policy on the provision of written translation services that covers all staff and programs in DSS, HRA and DHS. According to the policy, all agency-developed documents that will be distributed to the public or shared with clients¹ are to be available in 12 languages (Arabic, Bengali, Simplified and Traditional Chinese, English, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu).

In order to simplify the message to staff and accommodate the needs of HRA and DHS's diverse program areas, each program has individualized policy on the use of interpretation services for client interactions. All of these policies include language explaining that:

- No program/employee can discriminate, restrict or deny services/benefits based on a client's language or lack of English language proficiency.
- All employees are required to work with clients in the language of the client's preference.
- All limited English proficient (LEP) clients must be offered immediate, free and confidential language services.
 - Language services can be provided by bilingual staff or by using professional interpretation services, including telephonic interpretation services.
- Individuals under the age of 18 are not allowed to provide interpretation services.
- Other clients or members of the public cannot be asked to provide interpretation services as all LEP clients have the right to confidential services.
- Staff can access telephonic interpretation services, onsite interpretation services and sign language interpretation services 24 hours a day/7 days a week.

¹ Throughout this document, the word "client" is used to refer to clients, applicants, consumers or members of the public.

- Staff may contact the Office of Refugee and Immigrant Affairs (ORIA) for additional support or to answer any questions.

Procedures differ on whether a client's family and friends will be permitted to provide interpretation services as long as programs do not require clients to do so. In general, programs that offer benefits and services allow clients to provide their own interpretation services, assuming that the suggested interpreter is over 18. Programs that conduct investigations generally do not allow clients to provide their own interpreters.

As with all policies and procedures, updates to any LEP policies are emailed directly to all relevant staff by the Office of Policy, Procedures and Training (OPPT). These policies and procedures are also available for review at any time on eDocs, an online document sharing database that can be accessed by employees.

Policies and procedures on providing language services are reinforced every year when staff receive their annual LEP training. (For additional details on the LEP training, see section 4.) Supervisors and managers frequently reinforce the Agencies' commitments to providing high-quality language services in their daily work with staff. Finally, staff and program leaders often take advantage of the language access resources and knowledge provided by ORIA. The ORIA Language Access team responds to staff emails and phone calls regarding language access policy and procedure on a daily basis.

Section 3: Provision of language services

(Refer to Administrative Code §23-1102 a.; §23-1102 b. (2, 5, 6, 7, 11); §23-1102 c.)

1.- Subcategory: Translation

(§23-1102 a.(1))

Describe the progress that the agency has made in translating its most commonly distributed documents into the 10 designated languages.

Identify any relevant goals from the agency’s most recent LAIP, progress toward those goals, and any related accomplishments.

DSS/HRA/DHS has made a commitment to providing written translations that goes well beyond the requirements of Local Law 30. Rather than translating “the most commonly distributed documents” into 10 languages, DSS/HRA/DHS are translating all client- or public-facing documents into 11 languages – Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.² (If English is also counted, then all documents will be available in 12 languages.) These commitments are reflected in the DSS policy on the translation of written documents.

In 2018, DSS/HRA/DHS translated a total of 2,403 documents.

Prior to the passage of LL30, all HRA public- or client-facing documents were available in a total of 10 languages. (Polish and French were not included.) In order to add two more languages (Polish and French), adjustments had to be made to the Paperless Office System (POS), a data entry system used by staff in many of the Agency’s largest programs, and the Print-to-Mail (PTM) process, which is how most client-specific documents are generated and mailed. These back-end changes were completed in 2018, allowing the Agency to move forward with the translation and programming of French and Polish notices. Due to the enormous number of documents involved, the translation and programming process is long. As of December 2018, HRA has programmed more than 75% of notices, exceeding the milestone listed in the Agency’s Language Access Implementation Plan. All forms that are manually generated (those that do not go through the POS or Print-to-Mail process) have been fully translated. HRA is on track for providing every client- or public-facing document in 12 languages by June of 2019.

² Local Law 30 requires 10 translations, including “Chinese.” The Agency has opted to provide translations in both Simplified and Traditional Chinese characters because DSS/HRA/DHS serves such a large Chinese reading population.

Prior to integration with HRA in 2017, DHS informally provided a number of documents in Spanish, but did not track or maintain translations in a formal, structured system.

In order to create a more cohesive system containing standardized forms and policies across all program areas, DHS has created a LL30 work group that includes program staff, technical staff, attorneys, writers and translation experts. This team has been meeting weekly for more than six months, rewriting DHS forms to comply with plain language standards. In order to more accurately reflect both completed work and continuing projects, DHS has modified its stated translation goals, breaking Goal #1 from 2018 into two separate goals.³

GOAL 1: Ensure all manually generated client notices and documents are in compliance with the Agency's translation policy (available in 12 languages).

- Milestone 1: Create an inventory of all manual client notices/forms. COMPLETED.
- Milestone 2: Prioritize which policies, including embedded forms, directly impact client benefits and services. COMPLETED.
- Milestone 3: Translate all manual forms that impact a client's benefits. TO BE COMPLETED BY JULY 2019.
 - As of February 2019, 13 forms have been reviewed, considered for plain language and free-form text, finalized, and translated.

GOAL 2: Ensure all forms generated through the CARES data management system are in compliance with the Agency's translation policy (available in 12 languages).

- Milestone 1: Create an inventory of all automatically generated client notices/forms. COMPLETED.
- Milestone 2: Determine what system/programs will be used to provide translated notices. COMPLETED.
- Milestone 3: Test the new form generation system to ensure that it can meet the programs' technical requirements and produce documents in 12 languages. COMPLETED.
- Milestone 4: Ensure all forms generated through the CARES data management system are in

³ See Addendum 2, DHS Language Access Goals, Goal 2 for original goal structure.

compliance with the Agency's translation policy (available in 12 languages). TO BE COMPLETED BY JULY 2019.

DHS expects to be fully compliant with the translation requirements of both LL73 and LL30 by July of 2019.

2 - Subcategory: Telephonic Interpretation

(\$23-1102 a.(2) and §23-1102 c.)

Describe the progress the agency has made providing telephonic interpretation during the previous calendar year.

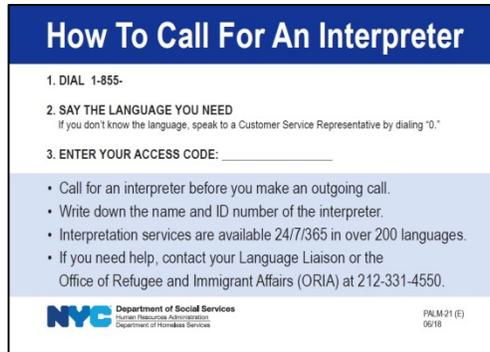
Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.

All DSS/HRA/DHS staff has access to telephonic interpretation services.

In 2018, DSS/HRA/DHS staff made a total of 316,717 telephonic interpretation calls - an average of 1,200 calls per business day. The Agencies' telephonic interpretation services vendor, Language Line Solutions, can provide interpretation services in 240 languages, 24 hours a day, 7 days a week, 365 days a year.

Prior to July 2018, DHS and HRA were providing this service via separate contracts using different vendors. These services were combined into a single contract in July of 2018 which meant a new telephone number, new access codes and new policies and procedures for all staff.

In order to support this transition, ORIA produced a new tool for all staff: an information card with the new number for interpretation services and an access code. (See below.) DSS/HRA/DHS printed and distributed 25,000 of these cards to staff throughout the five boroughs.



To ensure all staff received the information, ORIA held a meeting with the internal Language Access Work Group, a cabinet of Language Liaisons appointed by the leadership of each program area. Each Liaison was charged with ensuring that the information was communicated to all staff in their program. In addition, ORIA updated the Agencies' trainings on working with LEP clients, and worked with the Office of Policy, Procedure, and Training ("OPPT") to update and re-distribute all of the policies and procedures affected by this change. The Office of Communications and Marketing sent emails to all staff and posted updates on the HRA and DHS intranet sites. Finally, during and after the transition, ORIA carefully monitored service levels and ensured that language access staff were available to quickly respond to any staff questions or requests via phone and email.

While all DSS/HRA/DHS contracted vendors are required to provide a full suite of language services to clients, the Agencies have recognized that this is often a significant burden and has opted to share our interpretation services with some vendors. Previously, these services had only been shared with Adult Protective Services vendors because of the extreme burden of providing in-person interpretation services, which is a necessity for this client population. In 2018, the Agency provided access codes for telephonic interpretation services to more than 40 DHS Family Services Shelter providers who signed a Memorandum of Understanding (MOU). In doing so, DHS has increased services and improved accountability for homeless LEP families.⁴ DHS continues to monitor these services on a monthly basis as per the DHS 2018 Language Access Implementation Plan.

GOAL FOR 2019: DSS/HRA/DHS plans to increase the number of staff who are using the most current

⁴ The DHS Adults program pays for telephonic interpretation services as a separate billable line-item for shelter providers instead of providing access to a shared contract.

telephone technology to improve the ease of use and the clarity of interpretation calls.

GOAL FOR 2019: Increase the number of staff who have access to dual-handset phones, making it easier to use telephonic interpretation services to work with clients in face-to-face situations.

3 - Subcategory: In-Person Interpretation

(\$23-1102 a.(2))

Describe the progress the agency has made providing in-person interpretation during the previous calendar year.

Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.

HRA staff have had access to in-person interpretation service since before 2005. This service is primarily used by the Adult Protective Services program, but can be accessed by any program to support a client who cannot use telephonic interpretation for any reason.

When the HRA and DHS contracts were combined in July of 2018, ORIA was able to offer this service to DHS as well. (This fulfills one of the goals included in the DHS 2018 Language Access Implementation Plan.) IDNYC, which had previously had a similar service under a different contract, was also added to the larger Agency-wide contract in January of 2019.

In addition to its use for communication with clients for whom telephonic interpretation is not an option, DSS/HRA/DHS also uses an in-person interpreter at all public hearings and community meetings to ensure these events are accessible to all attendees.

During 2018, ORIA determined that despite providing an impressive array of languages, our in-person interpretation vendor could not provide services in a few rare languages. (Specifically, Hakka, a dialect of Chinese, and Mixteca, an indigenous language used in Mexico.) ORIA contracted with a second, in-person interpretation services vendor to cover these additional requests for interpretation.

In total, DSS/HRA/DHS used in-person interpretation services 3,168 times in 2018.⁵ From 2016 to 2018, the Agency piloted the use of video technology for providing interpretation services for limited English proficient New Yorkers in some HRA walk-in sites. Following the pilot, the Agency determined that the clients' experience was not as anticipated and the Agency is therefore evaluating next steps.

4 - Subcategory: Posting of multilingual signage about the availability of free interpretation services
(§23-1102 a.(3))

Describe the progress the agency has made posting multilingual signage about free language services. Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.

A poster-sized notice informing clients of their right to free language services is hanging prominently in all DSS/HRA/DHS locations. The poster reads, in 20 languages⁶, *"You have the right to free interpreter services at this location. If you need an interpreter, please go to the reception desk and we will call someone to interpret for you. If you have a question, comment or complaint about translation or interpretation at this location, please speak to a worker or call 311. Filing a complaint will not affect your case."* The poster also includes the symbol for sign language interpretation. Office of Communications and Marketing staff are responsible for regularly confirming that each location has this mandated sign in an appropriate location and replacing any copies that are damaged over time.

⁵ This information, including the count of interpretation instances, only refers to spoken language interpretation. It does not include sign language interpretation services which are also available to all DSS/HRA/DHS clients.

⁶ The languages on the poster are: English, Albanian, Arabic, Bengali, Simplified Chinese, Traditional Chinese, French, Greek, Haitian Creole, Hebrew, Hindi, Italian, Korean, Polish, Punjabi, Russian, Spanish, Urdu, Vietnamese and Yiddish. These languages include all 12 of the Agency-wide languages.

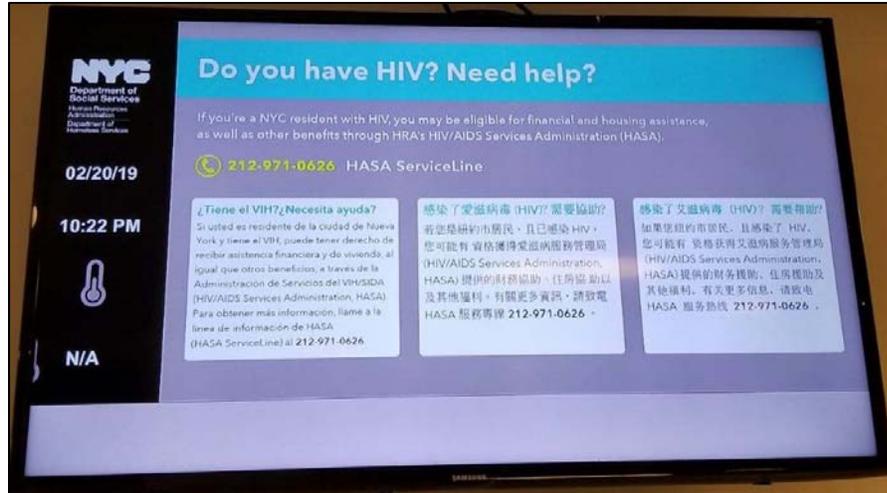


This notice has been hanging in HRA locations since 2015. DHS locations previously hung similar posters informing clients of their right to interpretation services, but those signs have been replaced with the above for consistency.

In addition to this notice of free interpretation services, all HRA and DHS locations welcome clients to locations with similar multi-lingual signs in prominent locations.



HRA has also begun to pilot the use of video screens in client waiting areas. The primary purpose of these video screens is to display multi-lingual information about the Agency. English language information is usually displayed across the top of the screen while the same information rotates below in two or three languages at a time. Once all 11 Agency translations have been displayed, the entire screen will shift to the next slide.



5 - Subcategory: Emergency Preparedness and Language Access
 (§23-1102 b.(5))

Describe the agency’s progress to ensure that language access services are provided during an emergency response.

Identify any relevant goals from the agency’s most recent LAIP, progress toward those goals, and any related accomplishments.

DSS has updated its Emergency Preparedness Plan, which covers HRA and DHS, to ensure that all LEP clients are able to access services during an emergency. This plan includes ensuring that documents are translated, that appropriate multi-lingual signage and LEP identification tools are available at emergency sites, that interpreters can be contacted and that staff are trained in the provision of language services. In addition, DSS’s Office of Emergency Management and ORIA have worked closely with MOIA and OEM to develop a plan to improve citywide coordination around LEP access to services during an emergency.

6 - Subcategory: Language Access Considerations in Agency Communications
 (§23-1102 b.(6))

Describe your agency’s progress toward making other types of agency communications (such as emergency notifications, public hearings and events, press releases, website content, social media, and other communications to the public) accessible to individuals and/or communities with Limited English Proficiency (LEP).

Identify any relevant goals from the agency’s most recent LAIP, progress toward those goals, and any

related accomplishments.

Most clients will use a self-service check-in kiosk at a Supplemental Nutrition Assistance Program (SNAP) or Cash Assistance center. These kiosks, which are available in 12 languages, reduce wait time by allowing clients to generate their own service tickets. In addition to giving them a number, the ticket identifies the client's language of preference, creating an additional prompt for staff to inquire as to whether language services may be necessary and alerting clients if the Agency has incorrectly recorded their language choice. Finally, the ticket informs the client, in 12 languages, that a Social Security number is not required to apply for HRA benefits.

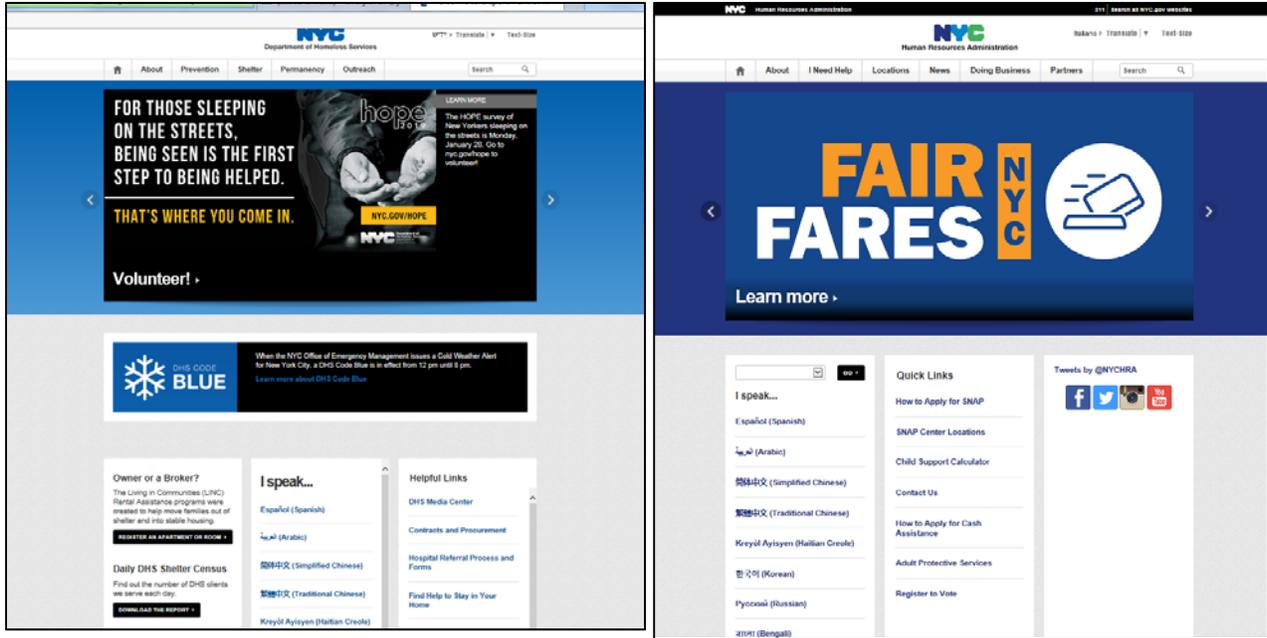
The addition of French and Polish to the ticket and the increase in kiosk languages from seven to twelve were two of HRA's 2018 Language Access goals.

If a client's language of preference is anything other than English, the self-service check-in kiosk delivers a Notice of Free Interpretation Services (DSS-4) with each ticket. The Notice of Free Interpretation Services reads, in 12 languages, *"You Have a Right to Free Interpretation Services. Please tell a worker if you want to speak with us in a language other than English or in sign language. If you have a question, comment or complaint about the interpretation services provided, please call 311. Filing a complaint will not affect your case."* By adding French and Polish text to this notice, HRA has met another 2018 Language Access goal.

DSS/HRA/DHS are also committed to making information available to LEP clients via Agency web sites and mobile applications. The HRA and DHS web sites (nyc.gov/hra and nyc.gov/dhs) both include text, directly below the large banner at the top of the page, that indicates where readers of the 11 Agency-wide languages can click to get information in their language. Each language link navigates to a page, translated by a professional linguist, that summarizes the Agency's programs and services and how to access those services. Links are available to applications, brochures and additional resources. Whenever possible, the links to these additional resources go directly to that resource in the appropriate language. The addition of new languages to the HRA site and including multi-lingual text on the DHS site were goals included in each Agency's 2018 Language Access Implementation Plan.

DHS web site:

HRA web site:



The newly updated ACCESS HRA, which is a mobile responsive web site and integrated mobile app, is available in Arabic, Traditional Chinese, Haitian Creole/French⁷, Korean, Russian and Spanish. Using Access HRA, individuals can apply for or recertify for SNAP benefits, upload documents, see their case status, available benefit amount and any upcoming appointments, update their mailing address or contact information and opt-in to the Fair Fares program – all in seven languages. DSS/HRA/DHS are exploring expansion into additional languages. Clients can also use Access HRA to update their preferred language with the Agency, which will automatically update the language in which they are receiving notices.

DSS/HRA/DHS also take advantage of New York City’s diverse multi-lingual media to share critical messages with clients. In late 2018 and early 2019, HRA purchased advertisements to alert clients to the impact of the federal government shut down and proposed changes to the rules on public charge. Radio ad spots played in Cantonese, English, Mandarin and Russian. Print ads were purchased in Albanian, Bengali, Chinese, English, Haitian Creole, Korean, Polish, Russian and Spanish.

⁷ The web site is available in Haitian Creole. The mobile application is available in French instead because neither Android nor iPhone support Haitian Creole.

DSS/HRA/DHS provide in-person interpretation services⁸, as well as translated materials⁹ at all public hearings and as requested for community meetings. When needed, the Agency provides headsets, booths and other professional interpretation equipment.

7 - Subcategory: Plain Language
(§23-1102 b.(7))

Describe the agency’s progress in ensuring that communications with the public are in plain language. Identify any relevant goals from the agency’s most recent LAIP, progress toward those goals, and any related accomplishments.

Staff at OPPT write, design and produce all of the Agencies’ client-facing documents. Public-facing documents, including brochures and signs, are produced by staff in the Office of Communications and Marketing.

For DSS/HRA/DHS, plain language requirements are written in two separate policies. An HRA policy from 2016 requires that all public- or client-facing documents be reviewed for plain language purposes. To the extent possible, all documents are at a sixth-grade reading level or lower and icons, images, and formatting are used to enhance clarity. The second policy that requires plain language review is the Agencies’ written translation policy. That policy applies to DSS, HRA and DHS.

Goal: All of DHS’s client- and public-facing documents will be reviewed for plain language during the spring of 2019 before being translated.

8 - Subcategory: Licenses, Permits, and Registrations
(§23-1102 b.(12))

*Note: The deadline for this section of Local Law 30 is June 30, 2020. Provide updates as applicable.

If your agency issues licenses, permits, and registrations, describe its progress toward providing language access when issuing licenses, permits, and registrations.

Identify any relevant goals from the agency’s most recent LAIP, progress toward those goals, and any

⁸ Interpretation at all public hearings is available in American Sign Language, Arabic, Bengali, Cantonese, French, Haitian Creole, Korean, Mandarin, Polish, Russian, Spanish and Urdu.

⁹ Printed materials are available in Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

related accomplishments.

DSS/HRA/DHS does not issue any licenses, permits or registrations.

Section 4: Training

(Refer to §23-1102 b.(8))

Describe the agency's progress in developing training on laws and agency policies and protocols on language access, and in training staff.

Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.

HRA has had a training, developed by ORIA, that covers the language access services required by law and Agency policies since approximately 2007. ORIA created a separate, customized language access training for DHS in 2017. Both HRA and DHS trainings remind staff of the diverse community that we serve, review federal, state, and local laws for providing services to LEP clients, and provide detailed instructions on how and when to access telephonic interpretation services, in-person interpretation services, sign language interpretation services, and written translations. Staff are challenged with a series of "tough situations" and reminded of the importance of accurately recording a client's language. Finally, the trainings provide ORIA's contact information in case staff have any further questions or communications challenges.

All front-line staff must receive the training every year. In 2018, approximately 3,500 HRA staff received the training. The majority of staff receive the training from professional trainers at OPPT, but ORIA also conducts a number of train-the-trainer sessions and direct staff trainings each year. ORIA will be conducting additional trainings to ensure that all front-line staff are trained.

ORIA updates the LEP trainings whenever there are changes to the language access policies and procedures. Regardless of procedure updates, the trainings are updated once a year to keep the scenarios fresh and the training engaging.

GOAL: Since HRA and DHS now share language service providers, instructions for how to access interpretation and translation services are the same for the first time. As such, 2019 will be the first year in which DSS/HRA/DHS staff all receive the same LEP training.

GOAL: The Agencies will continue to work to ensure that front-line staff receive LEP training in 2019.

Section 5: Record keeping and evaluation

(Refer to §23-1102 b.(3) and §23-1102 b.(4))

Describe the progress your agency has made in record keeping of language services and monitoring the delivery and quality of language services. Include any considerations that may influence the agency's "four-factor analysis."

Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.

ORIA is constantly monitoring our vendors to ensure that our clients and staff are receiving the highest quality language services. On a monthly basis, ORIA reviews service data, invoices, interpreter timesheets and staff/client complaints.

In July 2018, DSS/HRA/DHS transitioned to using a new provider of telephonic interpretation services. Between July and December of 2018, staff placed 183,956 calls to their service.¹⁰ In that period, the average wait-time to speak with an interpreter was 15.2 seconds. 99.5% of calls were connected to an interpreter in under two minutes and only 52 calls (0.03% of the total) were disconnected or were not able to be connected to an interpreter.

ORIA receives and closely tracks monthly reports on the number of canceled, missed or unfulfilled appointments by our in-person interpretation services vendor. ORIA is aware of less than 100 unfulfilled or canceled appointments in 2018 out of a total of 3,026 appointments¹¹. As mentioned previously, ORIA has also contracted with a secondary in-person interpretation services provider to support a few specific languages.

Language Line Solutions, the DSS/HRA/DHS vendor for written translations reviews each document for formatting and translation errors before it is finalized. Out of 2,403 documents translated in 2018, ORIA is aware of only six documents that were returned for errors.

GOAL: DSS/HRA/DHS will be investing in an additional quality assurance contract in 2019 to further confirm that all documents are accurately translated.

¹⁰ An additional 132,761 calls were placed through previous contracts for a total of 316,717 telephonic interpretation calls in 2018.

¹¹ An additional 142 in-person interpretation appointments were provided under a separate contract for IDNYC.

In addition to carefully monitoring service and contract data, ORIA works closely with center-based staff, Agency outreach units, community-based organizations (CBOs), immigrant clients and members of our Language Access Working Group for a full understanding of where our services need to be improved. The Office of Constituent Services tracks all language access complaints received by the Agency, 311, nyc.gov and/or other elected officials. ORIA reviews and responds to all language access complaints and takes appropriate follow-up actions with program areas. In 2018, ORIA received and reviewed only two complaints from clients regarding the services provided by our language services contractors. An additional 18 staff members reached out to ORIA on behalf of their LEP clients.

Section 6: Resource analysis and planning

(Refer to §23-1102 b.(11))

Describe the progress your agency has made in managing its language access resources (including staff and contracted services) to facilitate and/or improve language access. Include any considerations that may influence the agency's "four-factor analysis."

Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.

DSS/HRA/DHS recognizes that our most valuable resource are our staff members. In order to provide the highest quality service to New York City's diverse, multi-lingual residents, DSS/HRA/DHS needs a diverse, multi-lingual staff. As of June 2018, the Agency had more than 3,125 bilingual staff members who collectively speak 128 languages. In an effort to expand our multi-lingual work force even further, the DSS Office of Human Capital Management refocused on selective certification hiring in the second half of 2018 and worked with the Department of Citywide Administrative Services (DCAS) to make the information about selective certification for language more prominent on civil service notices.

DSS is pleased to announce that the Agency is now participating in the ASL Direct program. In partnership with DCAS and the Mayor's Office for People with Disabilities, Infoline has identified and hired a staff member fluent in American Sign Language. This staff member, who is expected to start in early Spring of 2019, will be directly answering questions via a secure, confidential, internet video feed from members of New York's deaf and signing community.

GOAL: In 2019, DSS/HRA/DHS will continue to work to hire additional staff via selective certification for language, ensuring that more of our clients will be able to communicate with staff directly in their language.

Beyond the hiring of bilingual staff, DSS/HRA/DHS is committed to providing the contractual resources to ensure that clients have access to the language services they need.

Service	Vendor	Contract Length	Total Contract Value
Sign Language interpretation services	Accurate Communication, Inc.	1 year	\$171,000
Bilingual staff testing	LM Language Services, Inc.	3 years	\$100,000
In-person interpretation services	Geneva Worldwide, Inc.	3 years	\$848,000
Telephonic interpretation services	Language Line Services, Inc.	3 years	\$7.4M
Written translation services	Language Line Services, Inc.	3 years	\$8.9M
Secondary In-person interpretation services	Accurate Communication, Inc.	1 year	\$1,000

GOAL: In 2019, DSS/HRA/DHS will be working closely with the Department of Citywide Administrative Services (DCAS) to ensure that there are contracts in place to continue to provide uninterrupted sign language interpretation service.

Section 7: Outreach and public awareness of language access services

(Refer to §23-1102 b.(9))

Describe the progress your agency has made in implementing strategies and outreach activities that will create public awareness of your agency's language assistance services. Include any updates regarding public awareness of the 311 Language Access complaint system.

Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.

In print, DSS/HRA/DHS inform the public of the availability of free language services through:

- posters in all walk-in centers (for details, see Section 3, Subcategory 4)
- notices of free language services in application and renewal packets
- notices on tickets in SNAP and Cash Assistance walk-in centers (see Section 3, Subcategory 6)
- Agency web sites and mobile applications (see Section 3, Subcategory 6)

In addition to these printed notices, there are a number of HRA and DHS outreach teams that meet and interact with the public, community-based organizations and elected officials on a regular basis. All of these team members have access to interpretation services and share information with members of the public regarding the Agency's use of language services.

GOAL: In 2019, DSS/HRA/DHS will be creating a new tool to increase awareness of the options available for providing sign language interpretation services. The new tool, which will be launched in May 2019, will allow clients who are deaf or hard-of-hearing to identify whether or not they use American Sign Language and whether they prefer to use video interpretation services, wait for an in-person interpreter or reschedule an appointment with an in-person interpreter.

Section 8: Language Access complaints

(Refer to §23-301 and §23-1102 b.(10))

1 - Describe how members of the public can submit language access complaints, questions and requests to the agency.

Members of the public can submit language access complaints, questions or requests in any of the following ways:

- Call 311
- Call Infoline at 718-577-1399
- Call the DHS Ombudsman Unit at 1-800-994-6494
- Speak to the Director at any of our walk-in sites or residential locations
- Click on “contact us” at nyc.gov/hra or nyc.gov/dhs
- Email ORIA at oria@dss.nyc.gov

2 - How many *language access complaints* did the agency receive via 311 during the previous calendar year? How were they handled?

In 2018, DSS/HRA/DHS received 23 language access complaints via 311.

All complaints or comments regarding DSS/HRA/DHS received by 311 are channeled to DSS’s Office of Constituent Services. Issues are summarized by agents and emails uploaded directly into the Internet Quorum (IQ) program. Any complaints that include a language component are forwarded to ORIA or to ORIA and a specific program area for resolution. If a complaint is limited to language services concerns, ORIA will work with the program involved to ensure that all staff are reminded of their language access duties and address any systematic language access concerns. If case issues are involved as well, ORIA works with the appropriate program to ensure that both case issues and language access concerns are addressed.

3 - How many *requests for language access services did the agency receive through 311 during the previous calendar year? How were they handled?**

DSS/HRA/DHS did not receive any requests for language access services through 311 during 2018.

***NOTE: “Requests for additional language services”** refers to new ways in which the agency can make its services or information available to those who do not read or speak English well – e.g., translating a specific brochure into additional languages, or providing bilingual staff at a particular service facility. It does NOT refer to individual requests for interpretation.

Section 9: Language Access Goals

List your agency's language access goals for Calendar Year 2019.

For an update on the Agency's 2018 Language Access Goals as listed in the HRA and DHS Language Access Implementation Plans, please see Addendum 2.

GOAL 1: Ensure all DHS manually generated client notices and documents are in compliance with the Agency's translation policy (available in 12 languages).

- Milestone 1: Create an inventory of all manual client notices/forms. COMPLETED.
- Milestone 2: Prioritize which policies, including embedded forms, directly impact client benefits and services. COMPLETED.
- Milestone 3: Translate all manual forms that impact a client's benefits, and ensure that those forms are available to the public. TO BE COMPLETED BY JULY 2019.

GOAL 2: Ensure all forms generated through the CARES data management system are in compliance with the Agency's translation policy (available in 12 languages).

- Milestone 1: Create an inventory of all automatically generated client notices/forms. COMPLETED.
- Milestone 2: Determine what system/programs will be used to provide translated notices. COMPLETED.
- Milestone 3: Test the new form generation system to ensure that it can meet the programs' technical requirements and produce documents that are understandable in 12 languages. COMPLETED.
- Milestone 4: Ensure all forms generated through the CARES data management system are in compliance with the Agency's translation policy (available in 12 languages). TO BE COMPLETED BY JULY 2019.

GOAL 3: DSS/HRA/DHS hopes to increase the number of staff who are using the most current telephone technology to improve the ease of use and the clarity of interpretation calls.

GOAL 4: Increase the number of staff who have access to dual-handset phones, making it easier to use telephonic interpretation services to work with clients in face-to-face situations.

GOAL 5: DSS/HRA/DHS will be investing in an additional quality assurance contract in 2019 to further confirm that all documents are accurately translated.

GOAL 6: Since HRA and DHS now share language service providers, instructions for how to access interpretation and translation services are the same for the first time. As such, 2019 will be the first year in which DSS/HRA/DHS staff all receive the same LEP training.

GOAL 7: The Agencies will continue to work to ensure that front-line staff receive LEP training in 2019.

GOAL 8: In 2019, DSS/HRA/DHS will continue to work to hire additional staff via selective certification for language, ensuring that more of our clients will be able to communicate with the Agency directly in their language.

GOAL 9: In 2019, DSS/HRA/DHS will be working closely with the Department of Citywide Administrative Services (DCAS) to ensure that the Agency has the contracts in place to continue to provide uninterrupted sign language interpretation service.

GOAL 10: In 2019, DSS/HRA/DHS will be creating a new tool to increase awareness of the options available for providing sign language interpretation services.

Addendum 1: Reporting questions for Local Law 73

(Refer to §8-1007 and §8-1008 d. of the Administrative Code)

***Note:** This section applies only to those agencies covered under Local Law 73: ACS, DHS/HRA, DOHMH.

1 - Record the number of LEP individuals served during Calendar Year 2018, disaggregated by primary language; agency contractor, contractor, or agency office *[HRA only]*; and assistance type required. *[Add rows as needed]*

Language	Agency contractor, contractor or agency office <i>[HRA only]</i>	Type of assistance required (<i>translation; telephonic interpretation; onsite interpretation</i>)	2018 Language Services instances (<i>number</i>)
See attachment			

2 - Record the number of bilingual and interpreter personnel employed by the agency, broken down by language translated or interpreted. *[Add rows as needed]*

Language	Number of staff
See attachment	

3 – How does the agency assess whether primary language determinations are properly recorded?

A client’s preferred written and spoken language is recorded when the client first comes into contact with the Agency. These questions are usually asked as part of an initial client interview and the answers recorded by staff, but in some situations clients will mark their language indicator on a sheet of paper or make their own selection from an electronic drop-down menu.

DSS/HRA/DHS are aware that clients' lives are always changing. In order to always provide clients with services in the language that works best for their current situation, DSS/HRA/DHS provide clients with multiple options to update or change their primary language indicator without requiring that the client claim that it was previously incorrect. This flexibility allows for new language skills or changes in client support structures.

DSS/HRA/DHS clients can update their language of preference in three ways:

1. They can ask staff to update their language indicator. As a part of the LEP training, staff are encouraged to note a client's language indicator during interactions and, if appropriate, ask if the client would like it updated.
2. Clients can update their own language indicator via the ACESSHRA web site or ask a CBO representative to do it for them through the provider portal.
3. Finally, clients can call or email the Agency (via the web site, Infoline, 311, etc.) and ask to change their language indicator. In 2018, the Agencies received 261 language change requests.

4 – How does the agency assess whether documents are translated accurately and disseminated properly?

DSS/HRA/DHS staff members do not translate documents.¹² All documents are translated by Language Line Solutions, the largest provider of language services in the country. Language Line puts each document through an in-depth, multi-stage review process. Of the 2,403 documents translated in 2018, only six were returned to Language Line for errors.

In addition to Language Line's internal review, ORIA spot checks documents by working with the Volunteer Language Bank organized by the Mayor's Office of Immigrant Affairs and routinely asks community members, CBOs and staff to forward any errors that they encounter. In 2018, city volunteers helped identify six translation errors. Community members, staff and CBO staff did not alert ORIA to any translation errors.

¹² The only exceptions to this rule are two professional Spanish language translators who work in OPPT and who were specifically vetted by an outside Agency for their language skills.

DSS/HRA primarily disseminates material through system-generated mailings. These mailings are automatically sent in the client's language of preference. If clients erroneously receive mail in the wrong language, they can correct their language indicators by contacting the Agency or by using AccesssHRA, as described above. DSS/HRA/DHS received 261 requests for a change of language in 2018.

Addendum 2: Update on the Language Access Goals included in the Agencies' 2018 Language Access Implementation Plans

HRA 2018 Language Access goals:

	GOAL #1: Ensure agency-created documents are translated in compliance with LL 30 and the Agency's translation policy	Responsible Staff	Deadline
Milestone 1	Create a catalog of agency-created documents. Prioritize the list according to the legal requirements of LL30.	OPPT, ORIA, Programs	COMPLETED
Milestone 2	Complete plain language review and editing of mandatory documents.	OPPT, Programs	COMPLETED
Milestone 3	Submit documents for translation.	OPPT, ORIA	COMPLETED
Milestone 4	Ensure that documents are translated into 11 languages. Static documents and those that are given to clients in a Center will be immediately available.	ORIA	COMPLETED
Milestone 5	Phase 1: Highest priority mailed documents (35% of total) programmed and deliverable to clients in 12 languages.	ITS, OPPT	COMPLETED
Milestone 6	Phase 2: Priority mailed documents (60% of total) programmed and deliverable to clients in 12 languages.	ITS, OPPT	COMPLETED
Milestone 7	Phase 3: All Agency forms deliverable to clients in 12 languages.	ITS, OPPT	On TRACK: June 2019
	GOAL #2: Ensure all application and recertification materials are LL30 compliant	Responsible Staff	Deadline
Milestone 1	Add additional languages to the Notice of Free Interpretation	ORIA, OCM	COMPLETED
Milestone 2	Make Agency produced client notices/forms in application/recertification packets available in 12 languages.	FIA, OPPT, ORIA	COMPLETED

	GOAL # 3: Expand the use of technology to provide high-quality client services	Responsible Staff	Deadline
Milestone 1	Add additional languages to Self-Service kiosks	ITS	COMPLETED
Milestone 2	Add French and Polish to tickets	ITS	COMPLETED
Milestone 3	Increase the number of tablets available for video interpretation services for LEP clients	ITS, FIA	ON HOLD
Milestone 4	Provide additional translations on HRA.gov	OCM, ORIA	COMPLETED
Milestone 5	Expand video sign language interpretation services to Office of Child Support locations	OCSS, ITS	COMPLETED
	GOAL # 4: Maintain compliance with LL by providing LEP training to all front-line staff	Responsible Staff	Deadline
Milestone 1	Rewrite LEP training for 2018	ORIA	COMPLETED
Milestone 2	Train all front-line staff	OPPT	3,500 STAFF TRAINED

DHS 2018 Language Access Goals:

		Responsible Staff	Deadline
GOAL #1: Ensure all client notices and documents are in compliance with the Agency's translation policy (available in 11 languages)			
Milestone 1	Create an inventory of all client notices/forms	DHS programs, ITS, OPPT	COMPLETED
Milestone 2	Determine what systems/programs will be used to provide translated notices	ITS, DHS programs	COMPLETED

Milestone 3	Ensure that all involuntary discharge forms are available in 11 languages	OLA, ORIA	ON TRACK: July 2019
Milestone 4	Review all notices to determine which should remain in circulation and prioritize translation	DHS programs	See Sec. 3.1
Milestone 5	Review all notices for plain language	OPPT and DHS programs	See Sec. 3.1
Milestone 6	Review all notices to reduce free-form text	ITS, DHS programs	See Sec. 3.1
Milestone 7	Create/update systems to allow the production of non-English forms and drop-in text	ITS	See Sec. 3.1
Milestone 8	Translate all forms into 11 languages	ORIA, OPPT	See Sec. 3.1
Milestone 9	Program new, translated forms into new distribution systems	ITS	See Sec. 3.1
GOAL #2: Use the power of shared DSS services to improve client service			
Milestone 1	Provide additional information on nyc.gov/dhs in all 11 citywide designated translation languages	OCM, ORIA, DHS programs	COMPLETED
Milestone 2	Ensure that all application packets include a notice of free interpretation services	HPA, OPPT, ORIA	COMPLETED
Milestone 3	Combine 311 and Shelter Repair Hotline complaint tracking procedures	OCC, DHS programs	COMPLETED
GOAL #3: Increase the use of newly available communications tools			
Milestone 1	Increase the use of on-site interpretation services to ensure that the language needs of the most vulnerable residents are met	ORIA, DHS programs	COMPLETED
Milestone 2	Increase the use of video to provide sign language interpretation services and reduce client wait times	ORIA, Disability Affairs, DHS programs	COMPLETED

GOAL #4: Ensure the continuity of services over multiple platforms			
Milestone 1	Review the use of telephonic interpretation services by DHS shelter vendors	ORIA, DHS programs	ONGOING
Milestone 2	Make a determination on the best way to provide language services to residents living in vendor-run shelters	ORIA, DHS programs	ON TRACK: July 2019
GOAL #5: Maintain compliance with Executive Order 120 by providing all front-line staff with LEP training			
Milestone 1	Rewrite LEP training for 2018	ORIA	COMPLETED
Milestone 2	Train all front-line staff	DHS programs, OPPT, ORIA	Dec. 2019