

# Annual Report on Implementation of Language Access

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

**5/4/2020**



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 2019.

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

## Section 1: Agency Information

<b>Agency name</b>	Department of Social Services (DSS)/ Human Resources Administration (HRA), Department of Homeless Services (DHS)
<b>Name of the agency's Language Access Coordinator (LAC) and all office titles held by this individual.</b>	Marah Rhoades, Deputy Commissioner, Office of Advocacy and Outreach
<b>Link to the agency's Language Access Implementation Plan (LAIP) posted on the agency's website.</b>	HRA: Click <a href="#">here</a> or see <a href="http://bit.ly/HRALAIP2018">http://bit.ly/HRALAIP2018</a> DHS: Click <a href="#">here</a> or see <a href="http://bit.ly/DHSLAIP2018">http://bit.ly/DHSLAIP2018</a>
<b>Year the LAIP was last updated</b>	Written in 2017. Updated in 2019.

## Section 2: Agency language access policy

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

The New York City Department of Social Services (DSS), consisting of the Human Resources Administration (HRA) and the Department of Homeless Services (DHS), is 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.<sup>1</sup>

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 clients are to be available in 12 languages (Arabic, Bengali, Simplified and Traditional Chinese, English, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu).

To simplify the message to staff and accommodate the needs of HRA and DHS's diverse program areas, each program has a policy on the use of interpretation services. All of these policies include the following elements:

- No program/employee can discriminate, restrict or deny services or benefits based on a client's language or lack of English language proficiency.
- All employees are required to work with clients in the client's preferred language.
- 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.
- All LEP clients have the right to confidential services. Staff may not ask other clients or members of the public to provide interpretation services.
- Staff can access telephonic interpretation services, in-person interpretation services and sign language interpretation services 24 hours a day/7 days a week.

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<sup>1</sup> 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 and guidance on any language access related issues.

In order to accommodate the diverse programs and services offered by the Agency, procedures differ on the use of a client's family or friends to provide interpretation services. In general, programs that offer benefits and services allow clients to provide their own interpretation services, if the suggested interpreter is over 18 years of age. 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 all Agency 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 6.) 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 rely on the language access resources and knowledge provided by ORIA. The ORIA Language Access team responds to staff emails and phone calls regarding the Agency's language access policy and procedure daily.

## Section 3: Language Access Accomplishments

Identify your agency's language access accomplishments during calendar year 2019 (CY19).

DSS is proud to be one of the largest providers of interpretation and translation services in New York City government. From January 1, 2019 – December 31, 2019, DSS/HRA/DHS:

- Provided 366,288 instances of telephonic interpretation services. This is an average of 1,400 calls per business day and an increase of 16% since 2018. Telephonic interpretation services were provided in 110 languages.
- Provided 2,967 instances of on-site interpretation services,<sup>2</sup> including providing interpretation services in 11 languages for five public hearings.
- Contracted with a second in-person interpretation services vendor<sup>3</sup> to increase the number of fulfilled in-person interpretation appointments and ensure that services can be provided for speakers of languages that are uncommon in New York City.
- Provided 759 instances of sign language interpretation services, including 58 appointments with the support of a Certified Deaf Interpreter (CDI). (A CDI is used when a client does not use American Sign Language or ASL.)
- Translated 1,479 documents, including both Agency-generated documents and client-provided documents used to establish program eligibility. As of 2019, all public- or client-facing documents generated by HRA and all DHS manually-generated notices are available in 12 languages.<sup>4</sup>

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<sup>2</sup> Spoken languages only. This number does not include sign language interpretation services.

<sup>3</sup> For the purpose of this report, "vendor" refers to a company contracted to offer language services, including interpretation or translation services. This is unique from the word "provider" which, in this report, refers to a company or organization contracted to provide social services to clients on behalf of the Agency.

<sup>4</sup> Twelve languages include English and 11 translations.

- Provided classroom training on working with limited English proficient clients to approximately 6,000 front-line staff members. In 2019, DHS and HRA staff received the same training for the first time.
  - The hour and a half classroom training includes information on the Agency’s policies and procedures, and provides instructions on accessing telephonic interpretation, in-person interpretation, sign language interpretation and written translation services. Staff are reminded that if they have any questions on providing language services or need support in working with a client, they should call ORIA.
  
- Increased the number of languages available at the check-in kiosks for walk-in Supplemental Nutrition Assistance Program (SNAP) and Job Centers. The self-check-in process is now available in Arabic, Bengali, Traditional and Simplified Chinese, English, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu. (The five underlined languages are newly added.)
  
- The Agency recognizes that its external providers are required to provide full language services to all clients as required under the Americans with Disabilities Act, Local Law 73, and the terms of their contract with DSS. To improve service for our clients, the Agency began to allow some providers<sup>5</sup> who are contracted to offer client services to access our telephonic interpretation and ASL interpretation contracts in 2018. (A limited number of providers also have access to our in-person interpretation services contract.) In 2019, this process expanded to allow 46 providers to share the Agency’s sign language interpretation contract and 105 providers to access the Agency’s telephonic interpretation contract. These providers are associated with five separate program areas. (For additional details, please see section 5, subcategory 2.)
  
- In conjunction with the Mayor’s Office for People with Disabilities, DSS hired a bilingual Infoline Agent who uses ASL.<sup>6</sup> This Infoline staff member can be reached via Video Phone, allowing ASL users to contact the Agency directly to resolve case issues, ask questions and request

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<sup>5</sup> For the purpose of this report, " provider" refers to a company or organization contracted to provide social services to clients on behalf of the Agency. This is unique from the word "vendor" which, in this report, refers to a company contracted to offer language services, including interpretation or translation services.

<sup>6</sup> Infoline is the Agency’s call center.

interpretation services for future appointments. Since the program’s inception on July 31, 2019, ASL Direct has answered 348 calls in ASL.

- Created a new “ASL Options Card,” which is a tool that helps staff ask clients who use sign language how they wish to receive sign language interpretation services. To date, more than 2,000 copies of the tool have been distributed to staff at locations around New York City.



- Created a new video tool to support the ASL Options Card. The video uses ASL and informal gestures to explain to clients how to use the card. The video is accessible on the HRA and DHS intranet sites, allowing staff to share the video with clients in our walk-in centers.



- Worked with a professional language services vendor to upgrade and update the Agency’s translation glossary, ensuring that translations are higher quality and more consistent.

- Launched a new translation quality assurance contract to ensure that translations are the highest possible quality and consistent with the Agency's new translation glossary.
- DHS created and tested a new process within the Client Assistance and Rehousing Enterprise System (CARES) that allows staff to create and distribute forms and notices in languages other than English for limited English proficient residents. Translated forms and notices will be available through this system in 2020.
- Updated the telephone technology used by 1,114 staff members to new Voice Over IP technology. This upgrade includes a higher quality phone, making it easier for staff to access telephonic interpretation services and increasing call clarity.
- Provided dual handsets phones to 486 additional staff members to ease communication with LEP clients in walk-in locations.
- Worked with the Mayor's Office for People with Disabilities to ensure that the city-wide procurement process for sign language services for the years 2021-2023 considers the unique needs of our client population and that the winning vendor will be able to provide our clients with the services that they need.
- Worked with the DSS Security team to codify a new protocol that allows interpreters to access walk-in locations without compromising building security, ensuring that our clients receive the services that they need in a timely manner.

## Section 4: Language Access Goals

**Identify the agency's language access goals from its most recent Language Access Annual Report. Describe the progress you have made in reaching those goals.**

*2019 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.*
- *Milestone 2: Prioritize which policies, including embedded forms, directly impact client benefits and services.*
- *Milestone 3: Translate all manual forms that impact a client's benefits and ensure that those forms are available to the public.*

2020 update: Completed. In the last two years, DHS has taken on the significant task of ensuring that all manually-generated forms that are commonly distributed to clients or the public are available in 12 languages. This process has included a significant simplification and plain language component that involved removing duplicate and obsolete forms from circulation, shortening forms when possible, and using plain language and graphics design to make information easier to understand. All 43 of the manually-generated forms that are regularly used by DHS are now being distributed in 12 languages.

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*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.*
- *Milestone 2: Determine what system/programs will be used to provide translated notices.*
- *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.*
- *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).*

2020 Update: In progress. DHS/DSS encountered several obstacles in reaching this goal, primarily the need to develop a technological solution that allows staff members to generate immediate, personalized, case

specific notices that are also understandable. In almost all cases, the forms being translated needed extensive revisions before translation could take place, a process that required cooperation between multiple levels of government and various programs. DSS and DHS remain fully committed to realizing the goal of having fully translated, individualized notices generated through the CARES system. The team working on this project meets on a weekly basis and progress continues.

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*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.*

2020 update: Completed. In 2019, DSS upgraded the phone technology in four of our service locations, improving the phones and phone service used by 1,114 staff members. The new Voice Over IP system means an upgrade in phone technology, ensuring that all staff members can easily make conference calls for telephonic interpretation services. The system upgrade also improves call clarity and, because the system is now fully controlled by DSS technology staff, repairs and troubleshooting are easier and quicker.

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*2019 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.*

2020 update: Completed. In 2019, DSS provided new dual handset phones to 486 staff members.<sup>7</sup> The use of dual handsets makes an interpreted conversation between two individuals who are both in the same physical location much easier and faster.

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<sup>7</sup> This number includes new dual handsets only. It does not count dual hand-sets that were previously in use.

*2019 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.*

2020 update: Completed. DSS entered into a translation quality assurance contract with Eriksen Translations in February 2019. To date, they have reviewed several public-facing documents and supported the creation of our newly updated translation glossary.

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*2019 GOALS 6 and 7 (Combined): 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. The Agencies will continue to work to ensure that front-line staff receive LEP training in 2019.*

2020 update: Completed. In 2019, all DSS/HRA/DHS front-line staff received the same training on working with limited English proficient clients. Approximately 6,000 staff members received the hour and a half classroom training. The training covered the Agency's policies and procedures and provides instructions on accessing telephonic interpretation, in-person interpretation, sign language interpretation, and written translation services. Staff are reminded that if they have any questions on providing language services or need support in working with a client, they should call ORIA.

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*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.*

2020 Update: In 2019, DSS/HRA/DHS hired 13 additional bilingual staff via selective certification. These new staff joined a team of 1,050 bilingual staff already in place at the Agency.<sup>8</sup> In 2020, the Agency is committed to identifying barriers to hiring via selective certification for language.

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*2019 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.*

2020 update: Completed. The DSS Agency Contracting and Compliance Office (ACCO) worked with ORIA to put in place a two-month Purchase Order to ensure that there was no gap in the Agency's ability to provide sign language interpretation services to our clients, when a contract ended two months before the next DCAS city-wide contract began.

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*2019 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.*

2020 Update: Completed. After significant review by advocates, clients, and the deaf community, the "ASL Options Card" was finalized in April 2019. Since then, more than 2,000 copies have been distributed to front-line staff in all program areas. The Agency has further supported the tool by creating a companion video which explains the options for receiving sign language services in ASL and using informal gestures. (See Sec. 3 for images of both the tool and the video.)

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<sup>8</sup> The majority of the Agency's bilingual staff are self-identified volunteers. Unlike staff hired via selective certification, they are not required to use their language skills, but more than 50% of them replied in a survey that they use their language skills at work daily or often. (Data from a voluntary staff email survey in April 2019.)

## Section 5: 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))

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

DSS/HRA/DHS has made a commitment to providing written translations that goes beyond the requirements set forth in 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. (If English is also counted, then all documents are available in 12 languages.) These commitments are reflected in the DSS policy on the translation of written documents.

In 2018, DSS/HRA/DHS embarked on an ambitious project to ensure that all our client- and public-facing documents met this translation standard. After ensuring that multiple client notification and data tracking systems were updated to allow for additional languages, the Agency reviewed every notice. As of December 2019, virtually every HRA-generated notice or form currently in use is available in all 12 languages. Similarly, all DHS manually-generated notices or forms are available in all 12 languages. The Agency is committed to making DHS CARES-generated notices available in 12 languages in 2020.

In addition to translating Agency-generated notices, DSS/HRA/DHS continues to provide clients with translations of their own documents when these documents are needed to prove eligibility for Agency programs. Most Agency benefits require proof of: identify, income, and residency. If the documents that a client presents for this purpose are in languages other than English, the Agency provides the translations for these documents, rather than requiring that clients assume the expense of providing their own translations.

In 2019, DSS/HRA/DHS translated a total of 1,479 documents.

2 - Subcategory: Telephonic Interpretation

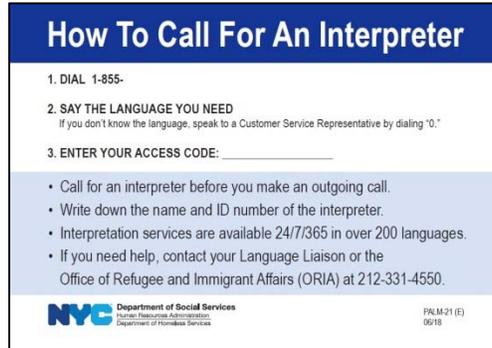
(§23-1102 a.(2) and §23-1102 c.)

**Identify the progress the agency has made providing telephonic interpretation during CY19.**

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

In 2019, DSS/HRA/DHS, provided 366,288 instances of telephonic interpretation services. This is an average of 1,400 calls per business day, an increase of 16% since 2018. In total, telephonic interpretation services were provided in 110 languages. 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.

All DSS/HRA/DHS staff are provided with an information card with a number for interpretation services and an access code. These cards are distributed to new staff and redistributed at language access trainings each year.



All DSS/HRA/DHS contracted providers are required to provide a full suite of language services to clients. The Agencies have opted to share our interpretation services with some providers. In 2018, the Agency began providing access codes for telephonic interpretation services to certain DHS Family Services Shelter providers. The Agency is continuing to expand this service. By December of 2019, the Agency was sharing telephonic interpretation services with 104 providers in the following programs: Adult

Protective Services (APS), Adult Services, Family Services, Homelessness Prevention Administration (HPA) and the Office of Domestic Violence and Emergency Intervention Services (ODVEIS).<sup>9</sup>

DSS/HRA/DHS has focused on improving the telephone technology used by some members of staff. In 2019, 1,114 phones in four Agency locations were upgraded to new Voice-Over IP phone systems. This upgrade included the installation of new phones to replace older, box-style phones. These new phones make it easier to connect to interpretation services and improve call clarity for both staff and clients.

In 2019, 486 staff were provided with new dual handsets, allowing for a more natural, seamless interpreted conversations.

In 2020, the Agency is committed to continuing to improve the telephonic infrastructure being used by our staff by ensuring that every staff member who interviews clients at their work station is provided a dual handset phone.

### *3 - Subcategory: In-Person Interpretation*

(§23-1102 a.(2))

#### **Identify the progress the agency has made providing in-person interpretation during CY19.**

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 also be used by any program in order to support a client who, for any reason, is unable to use telephonic interpretation. When the HRA and DHS contracts were combined in July of 2018, ORIA was able to offer this service to DHS as well. IDNYC, which had previously had a similar service under a different contract, was added to the larger Agency-wide contract in January of 2019. This change eased the administrative burdens of maintaining multiple contracts and allows ORIA to appropriately monitor service provision across the entire Agency.

In addition to its use for communication with clients for whom telephonic interpretation is not an option, DSS/HRA/DHS uses an in-person interpretation at all public hearings and community meetings to

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<sup>9</sup> ORIA uses access codes to carefully track service usage by providers in each program. Program leaders are sent monthly reports on provider usage. To date, usage has been well within levels that program leaders have considered appropriate.

ensure these events are accessible to all attendees.<sup>10</sup> When needed, DSS/HRA/DHS can also provide booths and headsets for public events.

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 and did not have enough interpreters available in other languages. To address this, ORIA contracted with a second, in-person interpretation services vendor to close this service gap and ensure that all our clients receive the best possible service with the shortest possible wait time.

In total, DSS/HRA/DHS used in-person interpretation services 2,967 times in 2020.<sup>11</sup>

#### *4 - Subcategory: Posting of multilingual signage about the availability of free interpretation services*

(§23-1102 a.(3))

#### **Identify the progress the agency has made posting multilingual signage about free language services.**

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 languages<sup>12</sup>, *“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. The 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.

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<sup>10</sup> In-person interpretation at public hearings is provided in American Sign Language, Arabic, Bengali, Cantonese, French, Haitian Creole, Korean, Mandarin, Polish, Russian, Spanish and Urdu.

<sup>11</sup> 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.

<sup>12</sup> 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.



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

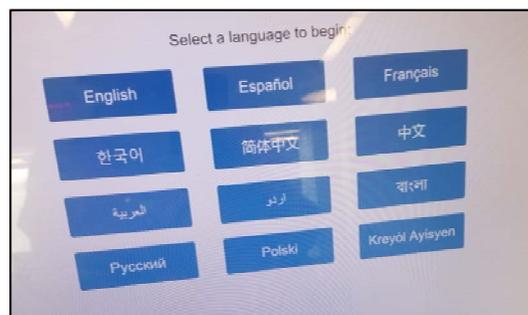
DSS has updated its Emergency Preparedness Plan, which covers both HRA and DHS, to ensure that all LEP clients are able to access services during an emergency. This plan includes ensuring that documents are translated, that appropriate multi-lingual signage and LEP identification tools are available 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: Multilingual Agency Communications*

(§23-1102 b.(6))

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

Most clients use a self-service check-in kiosk at a SNAP or Job Center. These kiosks, which are now available in 12 languages, reduce wait time by allowing clients to generate their own service tickets.



In addition to giving a number, the kiosk-generated ticket identifies the client’s language of preference, thus creating an additional prompt for staff to inquire as to whether language services may be necessary, and alerting the client if the Agency has incorrectly recorded their language. Finally, the ticket informs the client, in 12 languages, that a Social Security number is not required to apply for HRA benefits.

ST NICHOLAS JOB CENTER  
FRIDAY, JANUARY 31, 2020 1:49:36 PM  
FLOOR: 2  
CASH ASSISTANCE

# PI 5033

CA APPLICATION INTERVIEW LANGUAGE SPOKEN: ENGLISH

All are welcome and have a right to apply for HRA benefits. You do not need a social security number to apply. You have a right to free language services. If you have a complaint, ask to speak with a supervisor or call 311.

Todos son bienvenidos y tienen derecho a solicitar los beneficios de la HRA. No necesita un número de seguro social para la

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.”



**You Have a Right to Free Interpretation Services**

We have free interpretation services available. Please tell a worker if you want to speak with us in a language other than English or in sign language. You can simply show a worker the “I Speak” card below. If you have a question, comment or complaint about the interpretation services provided, please call 311. Filing a complaint will not affect your case.

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**Usted tiene derecho a recibir servicios de interpretación gratuitos**

Contamos con servicios de interpretación gratuitos. Si desea hablar con nosotros en un idioma distinto al inglés o en lenguaje de señas, hágaselo saber a un empleado, simplemente muéstrele la tarjeta “I Speak” que aparece a continuación. Si tiene alguna pregunta, comentario o queja acerca de los servicios de interpretación que brindamos, llame al 311. La presentación de una queja no tendrá incidencia sobre su caso.

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**您有權利使用免費口譯服務**

我們提供免費的口譯服務。如果您希望用英語以外的語言或手語和我們溝通，請告訴我們的工作人員。您只要向工作人員出示底下的「我說」(I Speak) 卡就可以了。如果您對我們提供的口譯服務有疑問、評論、或申訴，請致電 311。提交申訴將不會影響您的個案。

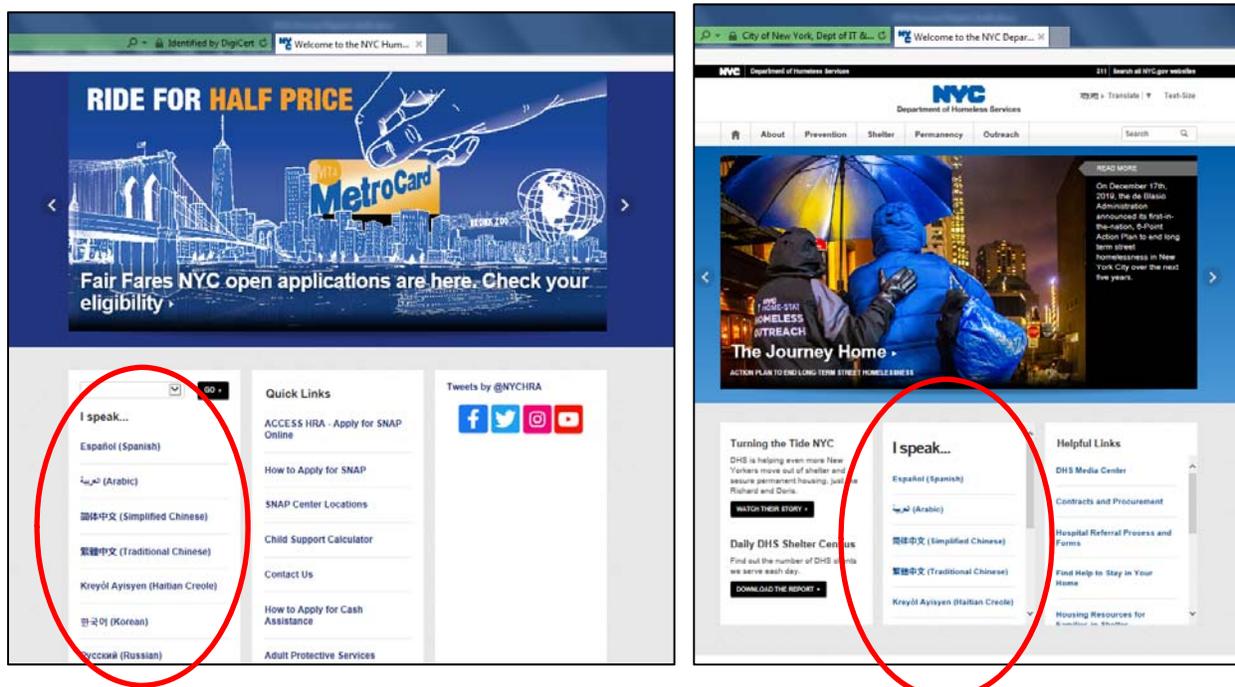
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**Вы имеете право на бесплатные услуги устного перевода**

Мы предоставим вам бесплатные услуги устного перевода. Сообщите сотруднику, если вы хотите общаться с нами не на английском, а на другом языке или на языке жестов. Вы можете просто показать сотруднику

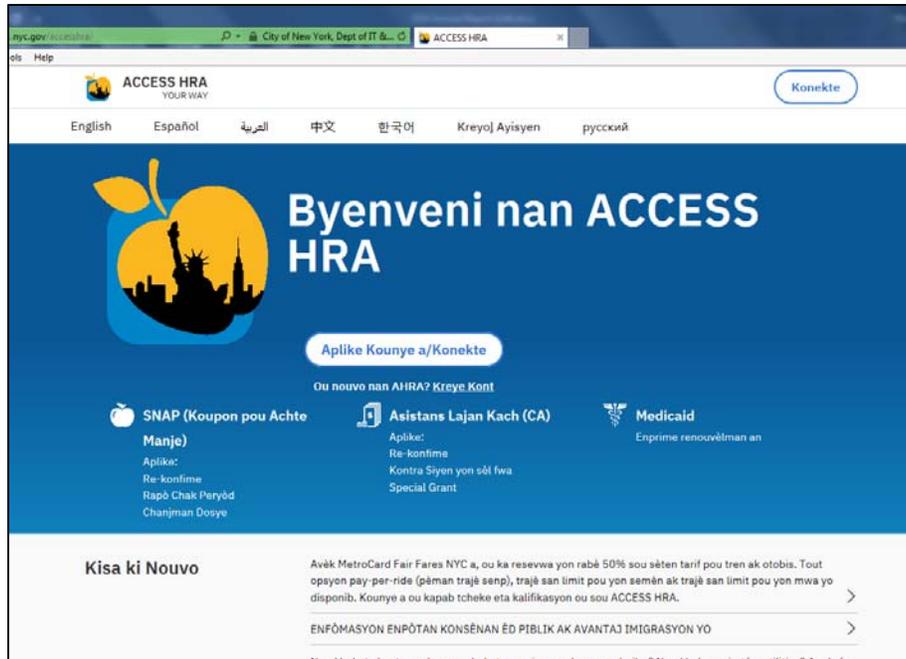
DSS/HRA/DHS are also committed to making information available to LEP clients via Agency websites and mobile applications. The HRA and DHS websites (nyc.gov/hra and nyc.gov/dhs) both include text,

directly below the large banner at the top of the page, that indicates where readers of the 11 Agency-wide translation 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 access program applications, brochures and additional resources. Whenever possible, the links to these additional resources go directly to that resource in the appropriate language.



AccessHRA, a mobile responsive website and integrated mobile app, is available in Arabic, Traditional Chinese, Haitian Creole/French<sup>13</sup>, Korean, Russian and Spanish. Using AccessHRA, 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 AccessHRA to update their preferred language with the Agency, which will automatically update the language in which they are receiving notices.

<sup>13</sup> The AccessHRA web site is in Haitian Creole, not French. Due to the technological limitations of iPhone and Android technology, the AccessHRA mobile site is in French, but not Haitian Creole.



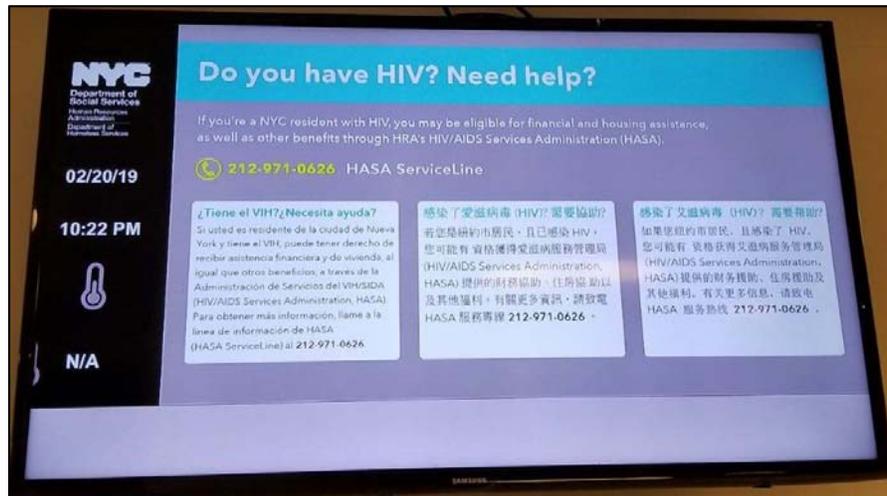
DSS/HRA/DHS also works with New York City’s community and ethnic newspapers to run city-wide campaigns. In March 2019, HRA launched the “Skip the Trip” campaign to promote SNAP and AccessHRA to all New Yorkers. Advertisements ran in English, Spanish, Korean, Russian, Arabic, Chinese, Polish, Bengali, and Haitian Creole. Radio spots played in English, Spanish, Chinese and Russian. Subway and bus ads were posted in Spanish and English and “Out of Home” posters were displayed in English, Spanish, and Yiddish.

In September 2019, HRA launched a targeted SNAP campaign for CUNY students that ran on social media in English, Spanish and Chinese and as banner ads in Spanish and Chinese.

In December 2019, HRA launched a Fair Fares ad campaign that kicked-off in community and ethnic newspapers in English, Spanish, Russian and Chinese and continues into 2020 in the 11 top languages used by New York City residents.

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 displayed on the initial program area message screen, followed by a rotation of each

Agency-mandated language and relevant imagery. Once all 11 Agency translations have been displayed, the entire screen shifts to the next slide.



7 – Subcategory: Plain Language

(§23-1102 b.(7))

**Identify the agency’s progress in ensuring that communications with the public are in plain language.**

Staff in the Office of Policy, Procedures and Training (OPPT) write, design, and produce all 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 Agency’s written translation policy from 2017. That policy applies to DSS, HRA and DHS.

*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, identify its progress toward providing language access when issuing licenses, permits, and registrations.**

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

## Section 6: Training

(Refer to §23-1102 b.(8))

**Identify the agency's progress in developing training on laws, agency policies, and protocols on language access, and in delivering training to staff.**

HRA has had a training, developed by ORIA, that covers the language access services required by law and Agency policies and procedures since approximately 2007. In 2019, all DSS/HRA/DHS staff received the same training on working with limited English proficient (LEP training).

The Agency's LEP training reminds staff about the diverse communities that we serve, reviews federal, state, and local laws for providing services to LEP clients, and provides 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 LEP training provides ORIA's contact information in the event staff have any further questions or client communications challenges and require support.

ORIA updates the Agency's LEP training whenever there are changes to the language access policies and procedures. Additionally, the trainings are also updated once a year to update the scenarios and ensure that the training is engaging.

All front-line staff must receive LEP training every year. In 2019, approximately 6,000 DSS/HRA/DHS staff received the training. This is an increase of 70% over the number of staff trained in 2018. Many staff receive the training from professional trainers at OPPT, but ORIA also conducts several train-the-trainer sessions and direct staff trainings each year. In 2020, ORIA will continue to conduct additional trainings to ensure that front-line staff from all program areas receive the training.

## Section 7: Record keeping and evaluation

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

**Identify 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."**

ORIA is constantly monitoring the Agency's language services vendors, including reviewing multiple interpreter scheduling programs, hundreds of interpreter timesheets and staff/client complaints, to ensure that our clients and staff are receiving the highest quality language services.

In 2019, DSS/HRA/DHS staff called for telephonic interpretation 366,288 times. The average wait-time to speak with an interpreter was 9.6 seconds. 98% of calls were connected to an interpreter in under two minutes and only 61 calls (0.02% of the total) were disconnected or were not able to be connected to an interpreter. In 2019, ORIA submitted 33 complaints to Language Line Solutions, our telephonic interpretation services vendor, regarding dropped calls or unprofessional behavior by interpreters.

ORIA closely tracks monthly reports on the number of canceled, missed or unfulfilled appointments by our primary in-person interpretation services vendor. In 2019, Geneva Worldwide, our initial service vendor, was unable to provide an interpreter for 5% of appointments. Because even a low unfilled rate is unacceptable when clients need our support, DSS/HRA/DHS engaged a second, in-person interpretation services vendor in 2019. By using two vendors instead of only one, we were able to provide interpretation services for 2,967 appointments out of 3,117 service requests for 2019. In 2020, ORIA will continue to work closely with both vendors and utilize our newly developed monitoring process to ensure that our unfilled in-person interpretation services rate drops to below two percent.

Language Line Solutions, the DSS/HRA/DHS vendor for written translations, reviews each document for formatting and translation errors before the written translation is finalized and returned to the Agency. Out of 1,479 documents translated in 2019, only 33 documents (2%) were returned for errors. Despite having a low error rate, DSS/HRA/DHS engaged a secondary written translation vendor in 2019 to provide quality assurance and review of translated documents. Eriksen Translations, our secondary vendor, produced the Agency's updated translation glossary in 2019, as well as reviewing and providing

comment on several high-profile documents. In 2020, DSS/HRA/DHS will be continuing to work with both vendors to improve the consistency and quality of our translations.

In addition to carefully monitoring service and contract data, ORIA engages regularly with center-based staff, program leadership, 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 and shares this information with ORIA. By putting all these sources together, ORIA can quickly identify and correct any gaps in service in programs throughout the Agency.

## Section 8: Resource analysis and planning

(Refer to §23-1102 b.(11))

**Identify 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.”**

As a large Agency with more than three million clients, DSS/HRA/DHS is fully committed to ensuring that all LEP clients receive the language access services and support that they need. The Agency’s contracts for telephonic interpretation, written translation, in-person interpretation and sign language interpretation reflect this level of dedication.

Service	Vendor	Contract Length	Total Contract Value
Written translation services	Language Line Services, Inc.	3 years	\$8.9M
Telephonic interpretation services	Language Line Services, Inc.	3 years	\$7.4M
In-person interpretation services	Geneva Worldwide, Inc.	3 years	\$848,000
Sign language interpretation services	Accurate Communication, Inc.	2 years	\$390,300
Bilingual staff testing	LM Language Services, Inc.	3 years	\$93,000
Secondary in-person interpretation services	Accurate Communication, Inc.	1 year	\$20,000
Quality assurance for written translations	Eriksen Translations	1 year	\$20,000

The Agency’s Office of Refugee and Immigrant Affairs (ORIA) includes a five-member, full-time language access team to manage contracts, provide staff guidance on how to access all the Agency’s language

access resources, develop language access tools and trainings, and advise the Agency on language access policies and procedures.

In addition to having a dedicated team working on language access issues, many of the Agency's other units incorporate the provision of language access services into their daily work. The Office of Communications and Marketing (OCM) ensures that Agency signage and outreach materials are fully multi-lingual. The Office of Policy, Procedures and Trainings (OPPT) submits every new and updated form/notice for translation and provides hundreds of hours of LEP training each year. The Information and Technology Services (ITS) team ensures that staff have dual-handset phones and that our Video Remote Interpretation (VRI) stations for working with sign language clients remain functional.

While language services contracts and dedicated administrative teams represent important tools, DSS/HRA/DHS recognizes that our most valuable resource are front-line staff members who provide language services to thousands of clients on a daily basis. 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 April 2019, the Agency had more than 1,047 self-reported bilingual staff members who collectively speak 70 languages. The Agency is committed to continuing to expand our multi-lingual workforce with selective certification hiring in 2020.

As a part of our commitment to a multi-lingual workforce, DSS is pleased to announce the success of our partnership in the ASL Direct program. In conjunction with DCAS and the Mayor's Office for People with Disabilities, DSS Infoline (the Agency's call center) hired a staff member fluent in American Sign Language in 2019. This staff member answers questions via a secure, confidential, internet video feed from members of New York's deaf and signing community. Since July 2019, this ASL Direct staff member has answered 348 sign language calls, including requests for interpretation services. The ASL Direct staff member is also an invaluable resource to help client and interpreters connect with each other in our large, multi-story, multi-program service centers.

## Section 9: Outreach and public awareness of language access services

(Refer to §23-1102 b.(9))

**Identify the progress your agency has made in implementing strategies and outreach activities that will create public awareness of your agency's language assistance services.**

**NOTE:** This item refers to strategies and outreach activities specifically about the availability of language assistance services provided by your agency, *not* multilingual outreach about your agency and its services or programs.

DSS/HRA/DHS explicitly informs the public of the availability of free language services through:

- posters in all walk-in centers (for details, see Section 5, Subcategory 4)
- notices of free language services in application and renewal packets
- notices on tickets in walk-in centers (see Section 5, Subcategory 6)
- Agency web sites and mobile applications (see Section 5, Subcategory 6)

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

Finally, by creating a multi-lingual environment, with posters in multiple languages in our physical locations, and text in multiple languages on our web sites and web applications, the Agency re-enforces the message that clients should expect to hear from us in their language of preference.

## Section 10: 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 (in addition to making a complaint via 311).**

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

- Call Infoline at 718-577-1399
- Call the DHS Ombudsman Unit at 1-800-994-6494
- Call ASL Direct (Video Phone only) at 347-474-4231
- Speak to the Director at any of our walk-in sites or residential locations
- Click on “contact us” at [nyc.gov/hra](http://nyc.gov/hra) or [nyc.gov/dhs](http://nyc.gov/dhs)
- Email ORIA at [oria@dss.nyc.gov](mailto:oria@dss.nyc.gov)

### **2 - How many *language access complaints* did the agency receive via 311 during CY19? Describe how each of these complaints were resolved.**

In 2019, DSS/HRA/DHS received 17 language access complaints via 311. This is a slight reduction from the 23 complaints that the Agency received via 311 in 2018.

All complaints or comments regarding DSS/HRA/DHS received by 311 are channeled to the DSS Office of Constituent Services. Issues are summarized by agents and then sent as emails that are 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 solely 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 substantive case issues are involved as well, ORIA will work with the appropriate program to ensure that both substantive case issues as well as language access concerns are addressed.

**3 – How many *language access complaints* did the agency receive via channels other than 311 during CY19? Describe how each of these complaints were resolved.**

In 2019, DSS/HRA/DHS received 55 language access complaints via channels other than 311.

These complaints were received via:

- A phone call directly to one of our call centers, including Infoline, the Ombudsman’s Office, the Shelter Complaint Hotline or the HRA Complaint line;
- Email to [constituentaffairs@hra.nyc.gov](mailto:constituentaffairs@hra.nyc.gov) or via the “contact us” link on either the HRA and DHS web sites;
- In-person at the Ombudsman’s office. (The Ombudsman’s office only receives complaints for DHS.)

All Agency language access complaints are channeled through the same process that is used for 311 complaints, which is detailed in response to question 2 of this section. Complaints are recorded by the Office of Constituent Services (OCS) and forwarded to the appropriate program area and/or ORIA through the IQ system.

**4 - How many *requests for language access services\** did the agency receive through 311 during CY19? How were they handled?**

DSS/HRA/DHS did not receive any requests for language access services through 311 during 2019.

**5 - How many *requests for language access services\** did the agency receive through channels other than 311 during CY19? How were they handled?**

DSS/HRA/DHS did not receive any requests for language access services through channels other than 311 during 2019.

**6 - Describe the agency's efforts to ensure public awareness of the 311 Language Access complaint system.**

As discussed in detail in Section 5, subsection 4, DSS/HRA/DHS informs clients of their right to free interpretation services through four primary means: a free interpretation services poster, a welcome poster, the ticket notice, and a printed notice of free interpretation services. All four of these documents refer clients to 311 for language access complaints.

The Agency's free interpretation services poster reads, in 20 languages: *"You have the right to free interpretation services at this location....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 Agency's welcome poster, which hangs in all walk-in locations, reads, in 12 languages: *"Welcome to HRA/DHS. Free interpretation services are available. For comments or complaints please call 311."*

The message printed on every ticket generated by a self-service check-in kiosk reads, in 12 languages: *"All are welcome and have the right to apply for HRA benefits....If you have a complaint, ask to speak with a supervisor or call 311."*

The Agency's Notice of Free Interpretation Services, which is printed at kiosks with tickets and distributed in all walk-in locations reads, in 12 languages: *"You have the right to free interpretation services....If you have a question, comment or complaint about the interpretation services provided, please call 311. Filing a complaint will not affect your case."*

**\*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 11: Language Access Goals

### List your agency's language access goals for Calendar Year 2020.

While we are proud of the work that we have done to ensure that our LEP clients can access the benefits and services that we offer, there is always more work to be done. To ensure that the Agency is meeting the needs of the diverse community that we serve, DSS/HRA/DHS is committed to making the following improvements in 2020:

- Goal 1: Be able to create and distribute individualized notices and referral forms from the CARES database system at DHS. To complete this process, the Agency will need to finalize the translation process, which includes a process for creating grammatically correct, personalized “snippets”, review each document created via this process, get approval for any required or desired changes from other impacted parties (including other levels of government), and provide staff training on how to use this new tool.
- Goal 2: Increase the number of providers who share our language services contracts, while continuing to track overall costs. Ultimately, the Agency hopes that this process will continue to improve client services and service tracking without significantly increasing overall costs.
- Goal 4: Work with the Mayor's Office of Immigrant Affairs (MOIA) and the Department of City-Wide Administrative Services (DCAS) to review the city-wide Request for Proposals (RFP) for the provision of language services from 2021-2023. The Agency seeks to ensure that our clients receive the seamless services that they need by ensuring that this RFP reflects our clients' unique needs, and that the contract values include DSS/HRA/DHS's high usage levels.
- Goal 3: Update the Agency's LEP training with new, relevant scenarios. ORIA, working in conjunction with OPPT staff trainers, will add appropriate material to cover questions raised in 2019 LEP training sessions. Continue to train front-line staff in all of the Agency's program areas, including new and expanding staff teams.

- Goal 4: Work with the Office of Legal Affairs and the Office of Disability Affairs to improve the Agency's provision of alternative format documents, including audio formats, large print, and Braille.
- Goal 5: Continue to work with both of our in-person interpretation services vendors to reduce our unfilled in-person interpretation services rate to be less than two percent of requested appointments.
- Goal 6: Work with the Mayor's Office of Immigrant Affairs (MOIA), the Office of LGBTQI Affairs, and members of the LGBTQI community to create a translation glossary, in 12 languages, of common expressions and phrases used by, and in reference to, the LGBTQI community.
- Goal 7: Continue to improve the Agency's telephonic infrastructure by ensuring that staff members who interview clients at their work station are provided a dual handset phone.
- Goal 8: Work with programs and the Office of Human Capital Management (HCM) to identify barriers to hiring via selective certification for language. Increase the diversity of front-line staff by using this civil service process when hiring for open positions.
- Goal 9: Create two new video trainings for staff. One training will cover how to complete a sign language interpretation request form. The other training will review how to connect to the Agency's Video Remote Interpretation (VRI) system for providing video sign language services at walk-in locations. The content of both trainings is already covered in annual classroom trainings, but these videos will provide refresher material that can be accessed as needed by staff.
- Goal 10: Video sign language interpretation in walk-in locations is provided via an outside video communications platform. Accessing this platform requires an account and password. In 2020, all the DHS VRI accounts and passwords will be placed under the control of ITS, rather than individual staff members. As a result, the service will remain accessible, regardless of staffing changes and allow ORIA to remotely assist staff logging into the system.

## Addendum: 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 2019, 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> )	2019 Language Services instances ( <i>number</i> )
	See attached chart		

**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 attached chart	

**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 encounters the Agency. These questions may be asked as part of an initial client interview and the answers are

recorded by staff. Alternatively, clients will make their own selections from an online drop-down menu if they are applying online or mark their language preferences on a paper application.

DSS/HRA/DHS are aware that clients' lives are always changing. To always provide clients with services in the language that works best for their current situation, we provide clients with multiple, easy options to update, or change their primary language indicator, without requiring that the client claim that it was previously incorrect.

DSS/HRA/DHS clients can update their preferred language in one of 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 AccessHRA website, or ask a CBO representative to do it for them through the provider portal.
3. Clients can call or email the Agency (via the web site, Infoline, 311, etc.) and ask to change their language indicator.

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

DSS/HRA/DHS staff members do not translate documents.<sup>14</sup> 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. Once the translations are returned to OPPT staff, they are again reviewed for formatting errors and inconsistencies. Of the 1,479 documents translated in 2019, only 33 were returned to Language Line for errors.

In addition to Language Line's internal review, DSS/HRA/DHS has contracted with a secondary translation vendor to provide professional quality assurance on our highest profile documents.

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<sup>14</sup> 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.

As a part of the LEP training that all staff members receive every year, all front-line workers are told that if the staff who may be bilingual individuals themselves notice any errors in our translations, or if clients comment on errors in our translations, to please submit them to ORIA for consideration by our professional vendors. The same message is relayed to advocates.

DSS/HRA primarily disseminates documents and materials 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 AccessHRA, as described above.