



# **IDNYC Program Language and Disability Access Plan**

**January 2, 2015**

## **I. PROGRAM MISSION AND BACKGROUND**

The IDNYC program will make a City government-issued photo identification card available to all residents of New York City aged 14 years or older who can demonstrate their identity and residency, regardless of their immigration status, housing status, or other factors. The program seeks to facilitate and expand New Yorkers' access to services offered by the public and private sectors by ensuring that they have documentation to demonstrate their identity. Among other measures, the IDNYC card will permit cardholders to indicate their primary language preference on the back side of the card, which will assist cardholders in interacting with City agencies and private organizations.

The Human Resources Administration (HRA) is the administering agency for the IDNYC program, as designated by the Mayor by Executive Order No. 6 of 2014.

## **II. PROGRAM LANGUAGE AND DISABILITY ACCESS GOALS AND OBJECTIVES**

The IDNYC program seeks to make access to the identification card—and, in turn, to City government and non-governmental services—accessible to all New Yorkers, regardless of disability or language spoken, to the maximum extent feasible. The IDNYC program has developed this language and disability access plan with guidance from the Mayor's Office of Immigrant Affairs and the Mayor's Office of People with Disabilities.

When an applicant or cardholder contacts an IDNYC program site or employee, language and disability must not be barriers to receipt of appropriate services for which they are eligible. The IDNYC program's goal is to ensure that neither language nor disability is a barrier to accessing services, and that all applicants have easy access to the services for which they are eligible, regardless of the level of their English proficiency or disability.



In furtherance of this goal, the IDNYC program has established the following objectives:

- To inform all program applicants that free interpretation services, including sign language interpreting services, are available.
- To train all front-line staff on cultural sensitivity issues and on providing language services to applicants.
- To ensure that all permanent enrollment centers provide access to people with disabilities consistent with the requirements of the Americans with Disabilities Act (ADA).
- To ensure that there is a robust reasonable accommodations process.
- To train all front line staff on disability etiquette and how to work with people with varying disabilities.

### **III. LANGUAGE AND DISABILITY ACCESS POPULATION ASSESSMENT**

Given the IDNYC program’s citywide geographic scope and anticipated applicant population across all City demographics, this language and disability access population assessment is based on citywide data.

The U.S. Census Bureau’s 2013 American Community Survey data show that, among New York City residents who speak a language other than English at home and speak English “less than very well”, the top 20 languages spoken (hereinafter referred to as “LEP languages”) are Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Yiddish, Italian, Polish, Arabic, Urdu, Hindi, Greek, Tagalog, Japanese, Hebrew, Serbo-Croatian, Portuguese, Vietnamese, and Gujarati.

The U.S. Census Bureau’s 2013 American Community Survey data show that 1.1% of New York City residents 18 to 64 are deaf or have a hearing disability (10.7% for New York City residents 65 and over); 1.4% of residents 18 to 64 have a vision disability (8.1% for 65 and over); 3% of residents 18 to 64 have a cognitive disability (11.2% for 65 and over); 4.3% of residents 18 to 64 have an ambulatory disability (27.7% for 65 and over); and 4.1% of residents 18 to 64 have a self-care or independent living disability (31.1% for 65 and over).



#### IV. IMPLEMENTATION PLAN LOGISTICS

##### *Implementation Timeline*

<u>DATE</u>	<u>ACTIVITY</u>
November 2014 – December 2014	Contract with interpretation and translation vendors
December 2014 – January 2015	Translate vital public documents into languages identified above
December 2014 – January 2015	Purchase audio induction loop systems for all enrollment centers
December 2014 – Ongoing	Identify, to the extent feasible, accessible “pop-up” (i.e., non-permanently sited) enrollment centers
December 2014 – Ongoing	Purchase technology in order to provide remote access for video relay services for sign language interpretation and assess feasibility of employing additional technologies for sign language interpretation
December 2014 – January 2015	Print vital public documents in Braille and in 16-point font for those with low vision
December 2014 – January 2015	Place all brochures on racks accessible below 48 inches for those in wheelchairs
December 2014 – January 2015	Develop, print, and post signage indicating that staff are able to help those with limited reading, writing, and other skills
December 2014 – January 2015	Perform outreach to LEP and disability communities



December 2014 – Ongoing

Train IDNYC program staff on interactions with LEP applicants and those with disabilities

January 2015 – Ongoing

Make IDNYC card application available as a readable PDF to allow it to be dictated or read in Braille

January 2015 – Ongoing

Provide a sign language interpreter within 48 hours of a scheduled appointment (or within approximately 2 hours of arrival at an enrollment site for applicants without an appointment)

January 2015 – Ongoing

Provide free translation and interpretation services for all applicants

January 2015 – Ongoing

Monitor translation and interpretation services via spot checks, complaint system, and contract usage

February 2015

Audio induction loop system will be available to applicants with hearing disabilities

## **V. DESIGNATION OF LANGUAGE AND DISABILITY ACCESS COORDINATOR**

The IDNYC Budget and Program Performance Analyst will implement this language access and disability plan in conjunction with each program area's staff and will be responsible for ongoing monitoring and reporting pertaining to language and disability access. The language and disability access coordinator for the IDNYC program can be reached by email at [idnyc@hra.nyc.gov](mailto:idnyc@hra.nyc.gov) or by phone at (929) 221-7614.



## **VI. SERVICE PROVISION PLAN**

### **A. Written Materials**

#### ***1. Language access***

In general, the IDNYC program will provide translation of public documents in languages based on at least the top 20 LEP languages, as identified in Section III above. The IDNYC program will rely on existing citywide contracts for translation services.

“Public documents” shall include but not be limited to the IDNYC program’s public website, application form and instructions, all benefit-related material, and the list of enrollment center locations and availability.

For printed brochures with limited space for text, the IDNYC program will provide translated information in the most common LEP languages, including the six languages (other than English) specified in Local Law 73 of 2003: Arabic, Chinese, Haitian Creole, Korean, Russian, and Spanish. Information in additional LEP languages will be made available on the IDNYC program’s public website.

The IDNYC program will also provide telephonic interpretation services in 200+ languages to assist speakers of languages for which translation of public documents is not provided.

The IDNYC program will apply plain-language principles in the development of all public documents. The program’s public documents will be written at a fifth-grade reading level.

IDNYC enrollment centers will have signage indicating that staff are able to help those with limited reading, writing, and other skills.

#### ***2. Disability access***

Applications and outreach materials will also be available in large print and Braille for the visually impaired. The IDNYC program will print vital public documents in Braille and in 16-inch font for those with vision impairments.

The IDNYC program will make the website-accessible IDNYC card application available as a readable PDF to allow vision-impaired applicants to access the information via dictation or in Braille.



The website will also include a portal that addresses all disability services provided, and will provide updates regarding pop-up enrollment centers' accessibility.

## **B. Interpretation Services, Disability Access, Public Signage and Reasonable Accommodations**

### ***1. Language access***

At card enrollment sites, the IDNYC program will undertake reasonable efforts to make in-person oral interpretation services available, subject to IDNYC program staff ability and capacity. Applicants and cardholders will be assigned to bilingual employees whenever practicable. The IDNYC program will strive to hire bilingual staff and assign them as available to card enrollment sites in a manner designed to reflect the local neighborhood.

At all IDNYC enrollment centers and other applicant contact sites, contracted telephonic and on-site interpretation services will be available in 200+ languages.

The IDNYC program will rely on existing citywide contracts for on-site and telephonic interpretation, with dual-headset phone systems available at all applicant contact sites.

### ***2. Disability access and reasonable accommodations***

In-person sign language interpretation will be available upon 48 hours advance notice from applicants, who may contact the IDNYC program for an appointment by calling 311 directly or, if appropriate, through the 711 Telecommunications Relay Service. Applicants in need of in-person sign language interpretation may also come to all enrollment sites without making such an appointment, and in-person interpretation services will be made available within approximately two hours after making the request to IDNYC staff (if operating business hours permit it).

Additionally, the IDNYC program is evaluating the feasibility of purchasing technology to provide remote access for video relay services for sign language interpretation and is assessing potential other technologies for sign language interpretation.

All IDNYC enrollment centers will be equipped with audio induction loop systems to ensure accessibility for hard of hearing applicants beginning in February 2015.



IDNYC staff will assist visually impaired individuals to read and complete the application if needed. IDNYC staff will provide assistance to individuals with other disabilities as needed.

All permanent enrollment centers will be wheelchair accessible.

Individuals with disabilities can request reasonable accommodations to assist them in applying for the card or communicating with the IDNYC program by calling 311 directly or, if appropriate, through the 711 Telecommunications Relay Service.

### **C. Public Signage at Applicant Contact Sites and Outreach**

All applicant contact sites will display signage in the most common LEP languages, including the six languages (other than English) specified in Local Law 73 of 2003 (Arabic, Chinese, Haitian Creole, Korean, Russian, and Spanish), informing applicants of the availability of free interpretation services in all waiting areas at each applicant contact site. Such signage will inform applicants that free telephonic interpretation services are available. The signs will inform the public that interpretation services are available in 200+ languages, including sign language. They will also state that IDNYC staff can assist with other disabilities.

The IDNYC program will direct LEP and disabled applicants to call 311 directly or, if appropriate, through the 711 Telecommunications Relay Service, or to visit the IDNYC website if they have complaints about the program's language or disability access services.

## **VII. TRAINING**

The IDNYC program will provide ongoing training on language and disability access to all applicant-facing employees, including training provided by the Human Resources Administration, the Mayor's Office of Immigrant Affairs, and the Mayor's Office for People with Disabilities on customer service, cultural and linguistic sensitivity, availability of language services, logistics of utilizing services, and how to work with interpreters. This training will include information on interacting and communicating with individuals with disabilities (i.e., "disability etiquette" training).

## **VIII. COMPLAINTS CONCERNING LANGUAGE AND DISABILITY ACCESS SERVICES**

The IDNYC program will make available a telephonic, written, and online complaint submission system via 311 (accessible by individuals with hearing or speech disabilities through the 711 Telecommunications Relay Service) and the



IDNYC website, and will ensure that language interpretation services are available to telephonic complainants in 200+ languages, including sign language. The program will track complaints concerning language and disability access services and remedial actions taken.

## **IX. RECORD KEEPING AND EVALUATION**

The IDNYC program's record-keeping methods will meet the requirements set forth by Local Law 73, as follows:

*... [T]he agency and each agency contractor shall maintain records of the primary language of every individual who seeks or receives benefits or services from the agency or agency contractor. At a minimum, the agency and each agency contractor shall maintain specific records of the following:*

- 1. The number of limited English proficient individuals served, disaggregated by agency, agency contractor or contractor, agency office, type of language assistance required and primary language;*
- 2. The number of bilingual personnel and the number of interpreter personnel employed by the agency, disaggregated by language translated or interpreted by such personnel;*
- 3. Whether primary language determinations are recorded properly; and*
- 4. Whether documents are translated accurately and disseminated properly.*

The IDNYC program's record-keeping will also include reporting on sign language interpreters and sign language services provided.

Annual reports will be compiled for on-site, telephonic, bilingual assistance, and written translation. These reports will track at a minimum:

- The number of limited English proficient individuals and disabled individuals served, disaggregated by type of language assistance required, primary language, and disability;
- The number of bilingual personnel and the number of interpreter personnel employed, disaggregated by language translated or interpreted by such personnel;
- Whether primary language determinations are recorded properly;
- Whether documents are translated accurately and disseminated properly; and
- Complaints and complaint resolutions.



These reports will be examined to determine the:

- Translation and interpretation needs of IDNYC applicants;
- Changes in the limited English proficient applicant population;
- Changes in the disabled applicant population;
- Effectiveness of existing language and disability access assistance to LEP and disabled applicants;
- Trends in complaints and monitoring related to bilingual staff; and
- Effectiveness of resolution mechanisms for resolving complaints concerning language and disability access.

Quality of services will be monitored and evaluated through various channels:

- On-site spot checking by IDNYC program staff at every applicant-contact site and via telephone contact and by a “secret shopper” program implemented by the Mayor’s Office of Operations;
- Follow-up support to every applicant-contact site after spot checks; and
- Feedback received via complaints, 311, and community organizations.

Finally, the IDNYC program will conduct annual evaluations of compliance with all aspects of Local Law 73, Executive Order 120, and this language and disability access plan.

## **X. RESOURCE ANALYSIS AND PLANNING**

The IDNYC program will rely on existing citywide contracts for interpretation and translation services. The IDNYC program will also analyze its language and disability access reports created pursuant to this plan, in order to (a) identify needs for adjustments to staffing and resource allocation, and (b) identify needs for bilingual workers at enrollment sites in neighborhoods with large LEP populations.

## **XI. ADDITIONAL INFORMATION**

Questions about this language and disability access plan should be directed to the language and disability access coordinator identified above by email at [idnyc@hra.nyc.gov](mailto:idnyc@hra.nyc.gov) or by phone at (929) 221-7614.