

# Language Access Implementation Plan

**Mayor's Office to Combat Domestic Violence**

April 2018

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

### **Mission**

The Mayor's Office to Combat Domestic Violence (OCDV), established in 2001, formulates policies and programs, and coordinates the citywide delivery of services for survivors of intimate partner violence, sex trafficking, and elder abuse. OCDV works with diverse communities and community leaders to increase awareness of domestic violence (DV). OCDV collaborates closely with government and nonprofit agencies that assist survivors, and operates the New York City Family Justice Centers (FJCs) in each borough. These co-located multidisciplinary centers provide vital social services, civil legal and criminal justice assistance for survivors of intimate partner violence, sex trafficking and elder abuse, and their children, in one location.

### **NYC Family Justice Centers, Community Outreach, and Policy and Training Institute**

#### **Family Justice Centers and Community Outreach**

OCDV operates The New York City Family Justice Centers (FJCs), overseeing service provision and providing ongoing training and community outreach. OCDV's Outreach Team provides community education and works closely to engage community members in various outreach events and forums.

#### **NYC Family Justice Centers**

The FJCs, located in all five boroughs, provide comprehensive civil legal, counseling and supportive services for survivors of intimate partner violence, elder abuse and sex trafficking. Key City agencies, social and civil legal services providers, the Policy and Training Institute, and New York City Police Department (NYPD) and District Attorney's Offices are located onsite at the FJCs to make it easier for survivors to access free and confidential services. Services are available to victims and survivors of abuse, including speakers of languages other than English, people of all sexual orientations, gender identities and expressions, people of all income levels, and people of all immigration statuses.

#### **Community Outreach**

OCDV's Outreach Team consists of trained Community Liaisons who work closely with NYCHA communities that are part of the Mayor's Action Plan for Neighborhood Safety (MAP) and the FJCs to educate community members about OCDV's mission, the dynamics of domestic violence, the availability of services through the FJCs and the various training offerings OCDV provides. Through these outreach efforts, the Team seeks to reduce stigma, educate the community about the services available for survivors of domestic violence and help reduce barriers when reporting abuse or seeking services.

#### **Policy and Training Institute**

The Policy and Training Institute (the Institute) has two outward facing training arms: the Domestic Violence Training Team (the DV Training Team) and the NYC Healthy Relationship Training Academy (the Academy).

### **DV Training Team**

The Training Team is comprised of trainers knowledgeable of topics related to domestic violence and intimate partner violence (IPV). The Team works with City agencies and community based organizations to identify training needs and provide a training menu ranging from introductory education to advanced topics.

### **NYC Healthy Relationship Training Academy**

The Academy, established in 2005, provides educational and skills-building training workshops for youth, parents and caregivers, and organizations that provide services to young people about healthy relationships and teen dating violence.

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

OCDV aims to ensure that all New Yorkers, including those with limited English proficiency (LEP), have meaningful access to the information and services administered or operated by the Office, including services and programming at the FJCs, outreach efforts, the DV Training Team and the Academy, as well as external agency communications. Language access is provided via telephonic interpretation service and/or training provision in non-English languages, translated materials, American Sign Language (ASL) interpretation, Communication Access Real-time Communication (CART) services, and other means, as appropriate. Signage informing LEP clients of the right to an interpreter and the right to file a complaint with a manager and/or via 311 are posted in conspicuous locations throughout FJC facilities. This signage, provided by the Mayor's Office of Immigrant Affairs (MOIA), provides information in New York City's top ten LEP languages – Spanish, Chinese, Russian, Haitian Creole, Bengali, Korean, Arabic, Urdu, French and Polish.

### **Accessibility of Interpretation**

OCDV and FJC on-site partner agency staff use telephonic interpretation, in-person interpretation (in limited circumstances), or provide services in an LEP client or community member's non-English language, if the provider is fluent or sufficiently proficient to communicate meaningfully and effectively in that non-English language. OCDV recognizes that LEP or non-English primary language speakers may, at times, find it difficult to discuss topics related to violence, abuse, violation, trauma or complex systems-related themes when speaking in a language other than their primary or first language. For these reasons, interpretation is available to all LEP clients and community members engaging with OCDV staff, in any capacity, as well as with partner agency staff working at a FJC. This interpretation shall be available if the LEP or non-English primary language speaker desires, regardless of the LEP person's ability to otherwise generally communicate in English.

### **Use of Children, Friends, and Family as Interpreters**

OCDV staff and FJC on-site partner agency staff members are strictly prohibited from using minor children to act as interpreters during any client or community member engagement, except in exigent circumstances. Additionally, OCDV staff and FJC on-site partner agency staff are strongly discouraged from the use of adult children, relatives, and friends of clients and community members to provide

interpretation. In an FJC setting, adult children, relatives, and friends of the client seeking services may only be utilized to communicate basic information or after the LEP person seeking services meets alone with staff and discusses, using telephonic interpretation, the general policy against and potential complications or concerns arising from the use of adult children, relatives, or friends as interpreters. Additionally, it is communicated that some FJC on-site partner staff may not be able to maintain the confidentiality or privilege necessary for effective performance of their role if an adult child, relative, or friend is present in a room or used as an informal interpreter. Clients who are deaf and do not communicate through ASL may not be able to access interpretation services through OCDV's existing providers, but all efforts will be made to engage these clients, including the potential use of friends and/or non-minor family members as interpreters. need non-ASL interpretation

### III. Identification and Assessment of LEP Communities

OCDV utilizes the United States Department of Justice "Four Factor Analysis" (<https://ojp.gov/about/ocr/lep.htm>) to aid the determination of the language access needs of the Office.

#### Factor 1: The Number and Proportion of LEP Persons in the Eligible Service Population

The New York City Department of City Planning, utilizing the United States Census' American Community Survey, 2011-2015, determined the most common languages throughout the City and by borough.

**Table 1**

This table reflects English and the top ten non-English languages spoken at home by New York City residents aged five years and older, Citywide and by borough.

NYC Languages – Census' American Community Survey, 2011-2015*							
#	Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island	
1	English (50.86%)	Spanish	English	English	English	English	
2	Spanish (24.6%)	English	Spanish	Spanish	Spanish	Spanish	
3	Chinese* (5.89%)	Kru, Ibo, Yoruba	Chinese*	Chinese*	Chinese*	Russian	
4	Russian (2.50%)	Bengali	Russian	French	Bengali	Italian	
5	French Creole (1.43%)	French	Yiddish	Korean	Korean	Chinese*	
6	Bengali (1.22%)	Albanian	French Creole	Russian	Russian	Arabic	
7	Yiddish (1.10%)	Italian	Arabic	Japanese	Tagalog	Albanian	
8	French (1.02%)	Mande	Hebrew	German	Greek	Polish	
9	Italian (1.01%)	Arabic	Italian	Hebrew	French Creole	Tagalog	
10	Korean (0.93%)	Chinese*	Polish	Italian	Polish	Urdu	
11	Arabic (0.81%)	Fulani	Urdu	Arabic	Italian	Korean	
* Population 5 years and over more information 2011-2015 American Community Survey Public Use Microdata 5-Year Sample							
*Includes responses of Chinese, Cantonese, Mandarin, and Formosan							

**Table 2**

This table reflects the top ten languages spoken at home by NYC residents ages 5 and older, Citywide and by borough for those who responded as speaking English less than “very well.”

NYC LEP Languages – Census' American Community Survey, 2011-2015 <sup>†</sup>						
#	Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island
1	Spanish (48.91%)	Spanish	Spanish	Spanish	Spanish	Spanish
2	Chinese* (17.48%)	Bengali	Chinese*	Chinese*	Chinese*	Chinese*
3	Russian (6.39%)	Kru, Ibo, Yoruba	Russian	French	Korean	Russian
4	Bengali (2.82%)	French	French Creole	Japanese	Bengali	Italian
5	French Creole (2.76%)	Albanian	Yiddish	Korean	Russian	Arabic
6	Korean (2.40%)	Chinese*	Arabic	Russian	Punjabi	Albanian
7	Italian (1.51%)	Italian	Polish	Arabic	Polish	Korean
8	Yiddish (1.51%)	Arabic	Urdu	Italian	Greek	Polish
9	Arabic (1.47%)	Mande	Italian	Portuguese	Tagalog	Tagalog
10	Polish (1.38%)	Fulani	Bengali	Polish	French Creole	Urdu
<sup>†</sup> Population ≥ 5 more information 2011-2015 American Community Survey 5-Year Estimates *Includes responses of Chinese, Cantonese, Mandarin, and Formosan						

**Table 3**

This table reflects data from the New York City Department of Education Citywide Parent’s Preferred Language Report. These responses indicate the desired languages of communication of NYC DOE students’ parents or guardians.

Parent’s Non-English Preferred Language, 2011-2015		
#	Citywide	Percent
1	Spanish	62.8%
2	Chinese, Any	17.0%
3	Bengali	4.5%
4	Arabic	2.6%
5	Russian	2.5%
6	Urdu	1.7%
7	Haitian Creole	1.2%
8	Korean	1.2%
9	French	0.8%
10	Polish	0.7%
11	Punjabi	0.6%
12	Albanian	0.6%

## Factor 2: The Frequency with Which LEP Individuals Come in Contact with the Agency

With the enactment of Local Law 30 of 2017, New York City’s list of designated citywide languages expanded to ten, including New York City’s top six LEP languages (indicated as speaking English “less than very well”) as determined by United States Census data, and an additional four languages as determined by NYC Department of Education language trend information. The determination of these languages also took into account rates of City services engagement and language frequency trends. The ten languages are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish. OCDV’s data on citywide client primary language indications aligns with these ten languages. *Brooklyn, Manhattan, and Queens have borough-specific top ten languages not included in the citywide list; those languages and their percentage of total languages of clients at the FJCs citywide are: Japanese (0.19%), Portuguese 0.15%), Punjabi (0.12%), and Hebrew (0.08%). Due to the overall small percentages of these speakers, OCDV is not currently prioritizing inclusion of these languages in its list of Office designated languages.*

**Table 4**

This table reflects English and the top ten non-English languages indicated by FJC clients as their primary language for the combined 2015 and 2016 calendar years.

FJC Primary Language 1/2015-12/2016 <sup>†</sup>						
#	Citywide <sup>i</sup>	Bronx <sup>†</sup>	Brooklyn	Manhattan	Queens	Staten Island <sup>o†</sup>
1	English (64.05%)	English	English	English	English	English
2	Spanish (23.25%)	Spanish	Spanish	Spanish	Spanish	Spanish
3	Chinese (2.49%)	French	Russian	Chinese**	Chinese**	Arabic
4	Russian (1.10%)	Bengali	Chinese**	French	Bengali	Polish
5	Bengali (0.83%)	Arabic	Arabic	Russian	Korean	--
6	Arabic (0.61%)	--	Haitian Creole*	Arabic	Russian	--
7	French (0.47%)	--	Bengali	Japanese	Arabic	--
8	Urdu (0.30%)	--	Urdu	Portuguese	Polish	--
9	Korean (0.29%)	--	French	Bengali	Urdu	--
10	Polish (0.29%)	--	Polish	Korean	Japanese	--
11	Haitian Creole* (0.27%)	--	Hebrew	Polish	Punjabi	--

<sup>†</sup> Excluding results of < 10 client responses (of 2015 and 2016 total data) or < 5 client responses of the limited 2016-only data available for the SIFJC

<sup>i</sup> Percentages of total client primary language data collected for 1/2015 – 12/2016, of a total 43,459 unique clients

<sup>o</sup> SIFJC opened 6/2016, thus providing limited primary language data for 6/2016 – 12/2016

\* Haitian Creole combined total of Haitian and French Creole responses

\*\*Chinese – combined Mandarin and Cantonese responses

**Table 5**

This table reflects the top ten languages requested for telephonic interpretation at the FJCs. OCDV does not currently record services provided in a non-English language by a provider fluent or sufficiently proficient in that language.

Telephonic Interpretation Usage 01/01/2016 – 12/31/2016						
#	Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island <sup>*,i</sup>
1	Spanish (59.41%)	Spanish	Spanish	Spanish	Spanish	Spanish
2	Mandarin (8.43%)	Arabic	Russian	Mandarin	Mandarin	Russian
3	Arabic (7.26%)	Bengali	Arabic	Cantonese	Korean	Sinhalese
4	Russian (5.06%)	French	Mandarin	Arabic	Arabic	Polish
5	Bengali (4.58%)	Burmese	Bengali	French	Bengali	Arabic
6	Korean (2.53%)	Urdu	Haitian Creole	Punjabi	Russian	Urdu
7	Cantonese (1.96%)	Haitian Creole	Cantonese	Haitian Creole	Hindi	--
8	French (1.94%)	(Tie8) Akan/Twi	French	Bengali	Cantonese	--
9	Haitian Creole (1.74%)	(Tie8) Polish	Polish	Russian	Punjabi	--
10	Urdu (1.48%)	(Tie8) Swahili	Hungarian	Korean	Polish	--
* SIFJC opened 6/2016, providing data from opening to 12/31/2016						
i Excluding results of < 4 calls for a top 10 telephonic interpretation usage language						

**Factor 3: Explanation of the Nature and Importance of the Programs/Services for the LEP Person**

Due to the often complex circumstances of intimate partner violence, sex trafficking, and elder abuse, a holistic and multifaceted approach to services and systems is critical for a victim or survivor to work toward safety and stability during and after instances of violence or abuse. These services may include case management, counseling, psychiatric care, safety planning, civil legal services, housing and public benefits assistance, and/or speaking with law enforcement agencies, including prosecutors and police. Language access services are essential for the provision of these often critical services to LEP victims and survivors of trauma and abuse. This is especially true for instances when a victim or survivor may need to recall their victimization in detail when seeking immigration remedies, filing police reports, or meeting with prosecutors.

Outreach efforts, training, and engagement are focused, more generally, on community members. This information, while very important, is less critically essential for language access than service provision. While language access planning and, especially, translation of outreach documents are priorities for the Office, they are prioritized after the real-time provision of services.



## Factor 4: The Resources Available to the Agency and the Costs of Providing Various Types of Language Services

### Resources Available

#### Family Justice Centers and Community Outreach

##### Family Justice Centers

OCDV administrative staff and partner agency staff located at the Family Justices Centers have:

- Access to telephonic interpretation provided by a City-contracted provider, in over 240 languages;
- Multilingual and diverse staff from City and community-based organizations located onsite, 199 of whom, in 2016, reported speaking at least one of 40 non-English languages; 21% of whom reported speaking more than one non-English language;
- Dual-handset telephones available in reception areas for telephonic interpretation in open spaces;
- Speaker telephones for telephonic interpretation in private or enclosed office spaces;
- Multilingual phone answering systems with standard greetings leading into language trees answered by onsite OCDV or partner staff who speak the selected language. Language trees at each FJC include:

Family Justice Center	Language Tree Options								
	English	Spanish	Italian	Mandarin	Cantonese	French	Korean	Bengali	Hindi
Bronx	✓	✓	✓						
Brooklyn	✓	✓							
Manhattan	✓	✓		✓	✓	✓			
Queens	✓	✓		✓			✓	✓	✓
Staten Island	✓	✓							

- The FJC informational flyer currently available in English and Spanish; will be available in all ten designated languages by July 1, 2018.

##### Community Outreach

OCDV Outreach Team staff have:

- Access to telephonic interpretation provided by a City-contracted provider, in over 240 languages;
- Multilingual and diverse staff and access to other multilingual staff from City agency and community-based partner organizations;
- Informational handouts distributed by the Outreach Team include:
  - A handout about OCDV and the Domestic Violence Hotline is available in a multi-language accordion-fold pocket document which includes English, Spanish, Russian, Chinese, Arabic, and Bengali (will be available in the additional five designated languages by July 1, 2018); and

- A handout about the FJC locations and services is available in a single-language accordion-fold pocket document in the following languages: English, Spanish, Russian, Chinese, Arabic, and Bengali (will be available in the additional five designated languages by July 1, 2018).

**Policy and Training Institute**

The Domestic Violence Training Team

The Training Team has: multilingual staff currently providing trainings in English and Spanish.

Healthy Relationship Training Academy

The Academy staff has: multilingual staff currently providing trainings in English and Spanish.

**Cost of Providing Language Services**

**2016 and 2017 Translations and Telephonic Interpretation**

OCDV utilized \$1,674 for materials translations and \$141,142 for telephonic interpretation services for a total of at least \$142,816 in language access costs in 2016. In 2017, OCDV utilized \$128,137.97 for telephonic interpretation services and \$1,249.88 for materials translations.

Table 6

Use of telephonic interpretation varies by borough due to the number of clients seen by each FJC, degree of language diversity of FJC clients, as well as the availability and capacity of FJC onsite staff members to meet with and serve LEP clients in their primary language.

<b>FJC Telephonic Interpretation Costs 1/2016 - 12/31/2016</b>	
<b>Borough</b>	<b>Total</b>
Brooklyn	\$43,057.45
Bronx	\$22,170.43
Manhattan	\$17,385.87
Queens	\$51,201.17
Staten Island*	\$7,327.00
<b>All FJCs</b>	<b>\$141,141.92</b>
* SIFJC opened 6/2016, providing data from opening to 12/31/2016	

<b>FJC Telephonic Interpretation Costs 1/2017 - 12/31/2017</b>	
<b>Borough</b>	<b>Total</b>
Brooklyn	\$45,707.53
Bronx	\$17,583.59
Manhattan	\$11,411.50
Queens	\$39,751.60
Staten Island	\$13,683.75
<b>All FJCs</b>	<b>\$128,137.97</b>

### **FY2018 Projection for Translation of Commonly Distributed Documents**

OCDV projects spending \$8,665.20 in FY18 for expanded translations of the Office's commonly distributed materials in the designated languages.

## **IV. Provision of Language Access Services**

### **Language Access in General Agency Services**

OCDV staff interaction with the public includes in-person service delivery, outreach activities, trainings, and written and telephonic correspondence. Telephonic interpretation is available via a City-contracted provider in over 240 languages. Agency staff are trained to use telephonic interpretation and to identify potential challenges with interpreters. If low quality or inappropriate interpretation is provided, staff will follow the procedures outlined in the *Language Access Complaints* section of this plan and report the issue to the appropriate OCDV administrative staff member. OCDV does not currently use selective certification to recruit language speakers; however, candidates with multilingual abilities are strongly encouraged to apply for positions. OCDV aims to identify means to prioritize language abilities in future contracts and other staffing agreements.

### **Family Justice Center Operations**

#### **Family Justice Centers**

##### In-Person Interactions

Upon entry to the FJCs, members of the public encounter signage in multiple languages, including the top ten NYC designated languages, indicating that interpretation is available and how or where complaints may be made. Additionally, each reception desk is staffed with personnel trained in offering and using telephonic interpretation to ensure that effective and meaningful communication is possible. Each FJC has "I speak" cards available for clients to take and use when engaging with other systems or organizations to indicate that they require assistance in a non-English language. After interacting with reception staff, clients meet in private with screening staff to ensure that the services offered by the FJCs are appropriate for the client. At that point, the screener verifies the language spoken by the client either by speaking in that language, assisting the LEP person with pointing to their language from a list of languages, or via telephonic interpretation. After screening, the subsequent staff people scheduled to meet with that client are informed of the client's primary language and instructed to use telephonic interpretation with that client unless the staff member speaks the client's language or the client refuses telephonic interpretation services.

##### Over-the-Phone Interactions

FJC main numbers have standard greetings leading into language trees with lines answered by onsite OCDV or partner agency staff who speak the selected language. Additionally, if a caller reaches a main phone line speaking a language not available on the language tree, the FJC administrative or partner agency staff conferences in the telephonic interpreter service.

### Public Events

OCDV includes information on accessibility for people with disabilities for all FJC trainings, including the availability of ASL interpretation, upon request. If OCDV receives a request for ASL or other interpretation for partner and community based organization staff training, OCDV administrative staff reaches out to a contracted provider for that service to schedule interpretation in advance of the training.

### Language Need Tracking

All clients who receive services from the FJCs meet with a screener upon their first visit. That screener records the client's primary language and, beginning in January 2017, the client's level of proficiency in English. The demographic information is kept in OCDV's FJC client intake database, which is maintained by the New York City Department of Information Technology and Telecommunications (DOITT). The limited information recorded in the client intake database is available to other providers as needed and dependent upon clients' individual confidentiality and privacy requests. At this time, OCDV does not track the frequency or language spoken of LEP callers to the main lines at the FJCs or to OCDV's main administrative phone line.

## **Outreach**

### In-Person Interactions

OCDV outreach staff disseminate information in a responsible and accessible way to build trust and illuminate pathways to support. Outreach is also done to help identify community-based resources and programs for victims and survivors, and strategize ways to reach all New York City communities. Community Liaisons conduct outreach in English, Spanish, and a variety of other languages, as well as work with partners who are often speakers of languages other than English. OCDV identifies LEP communities for outreach based on rates of LEP FJC client service engagement and via collaboration with community based organizations and stakeholders.

If Community Liaisons encounter a member of the public speaking a non-English language, all efforts are made to connect that person with an outreach worker speaking that language. If an outreach worker who is fluent or sufficiently proficient in that language is not available, all outreach workers have access to telephonic interpretation through a City-contracted provider, available in over 240 languages. Additionally, outreach workers have informational materials available in multiple languages, which include a main document with information in six languages – English, Spanish, Russian, Chinese, Arabic, and Bengali. OCDV will translate these documents into the additional five designated citywide languages prior to the July 1, 2018 deadline. These languages, prioritized for translation, are: Haitian Creole, Korean, Urdu, French, and Polish.

### Over-the-Phone Interactions

Outreach staff do not typically require interpretation services for over-the-phone interactions. However, if an outreach staff member does connect via telephone with a speaker of a non- English language, the outreach staff conferences in the telephonic interpreter service.

### Language Need Tracking

OCDV does not track the frequency or language spoken by LEP constituents encountered at public events.

## **Policy and Training Institute**

### **The Training Team**

#### Trainings

The DV Training Team provides trainings on IPV, trauma-informed care, vicarious trauma, and other topics. Members of the current DV Training Team speak English, Spanish, and a variety of other languages. The Team currently offers its IPV 101 training in Spanish, and aims to offer more training in Spanish in the future. Requests for trainings in Spanish come via OCDV's website as well as from community groups and organizations. Additionally, OCDV includes information on accessibility for people with disabilities for all Team trainings and conferences, including the availability of ASL interpretation upon request. The DV Training Team does not typically receive calls or requests in languages other than English or Spanish, but if a request was made the DV Training Team would utilize the telephonic interpretation service.

### **Healthy Relationship Training Academy (the Academy)**

#### Trainings

The Academy provides peer-led workshops to young people, parents, caregivers, and educators. The Academy provides trainings in Spanish for its primary healthy relationships and abuse training as well as its technology safety and abuse training. The Academy currently has staff members who speak Spanish and other non-English languages and provide trainings for young people and caregivers in English and Spanish. Requests for trainings in Spanish come via OCDV's website as well as from other community groups and organizations. The Academy does not typically receive calls or requests in languages other than English or Spanish, but if a request was made then the Academy would utilize the telephonic interpretation service.

### **Emergency Preparedness**

OCDV and its programs continue operations during an emergency as determined by City officials and utilize standard processes to provide language access through telephonic interpretation, as well as by Office or FJC onsite partner agency staff that are fluent or sufficiently proficient in the non-English language of the client seeking assistance during an emergency, as appropriate. While OCDV and FJC onsite partner agency staff may not be at full capacity due to the circumstances of the emergency, the reduced staff will continue to provide services for any clients that may contact the Office or appear at one of the FJCs. OCDV will forward relevant emergency notifications from the Office of Emergency Management (OEM), available with links in over 12 languages, on OCDV social media accounts. Additionally, in the case of weather or other emergencies, the FJCs may post printed standard notifications, in 12 languages, provided by OEM in conspicuous locations at relevant sites. OCDV plans to update and expand its emergency preparedness plans and aims to include information on providing

services to LEP people in the case of an emergency as well as addressing unique needs or circumstances that victims or survivors of intimate partner violence may face in seeking safety during an emergency.

## **Communications**

Language Access is considered in Office communications, including electronic media and ethnic and community media, for general content as well as communications in the case of an emergency. OCDV currently utilizes the NYC Twitter Spanish-language account to disseminate posts at the discretion of City Hall communications. OCDV plans to expand its outreach to ethnic and community media by targeting populations and communities that reflect OCDV and the City's goals around domestic violence awareness and prevention. These populations include: Jewish, Muslim, Arab, Asian, South Asian, Caribbean, and LGBTQ communities. OCDV also plans to focus more effort on connecting with ethnic and community media in regards to its outreach and FJC programs. The Office does not currently post content in multiple languages on social media, but aims to identify potential means to provide future multi-language social media content.

## **Plain Language**

OCDV created a Plain Language Working Group to ensure plain language standards are included in all current and future agency materials. The members of this group were identified for their involvement in language access and/or document creation in their role or unit. The Working Group members attended a 1.5 day Plain Language training administered by the Department of Citywide Administrative Services (DCAS). The Plain Language Working Group is responsible for reviewing each existing commonly distributed document for plain language standards and producing revised versions, if necessary, prior to sending the documents for translation in the designated ten languages. The Plain Language Working Group members are also responsible for training staff in their particular units on the principles of plain language.

## **Translation Services**

Other than limited outreach materials and client services navigation documents, OCDV does not generally create materials for public distribution. When determining the agency's most commonly distributed materials, OCDV placed documents into two general categories. The first and highest priority category consists of documents intended for victims and survivors of intimate partner violence and the public, including agency outreach and client services navigation documents. The second group of documents would be those intended for service providers and other government or community based organization staff. The second category of documents is not intended for the general public and is not currently being prioritized for translation, although some items are available in Spanish in addition to English.

OCDV plans to conduct a plain language review and revision of all public-facing documents prior to sending the documents for translation in the City's designated languages. After the documents are translated, OCDV will pull upon Volunteer Language Bank and multilingual OCDV and FJC on-site partner agency staff to conduct reviews to ensure that the translations are coherent, sensitive to issues of gender based violence, as well as use the vocabulary common in the provision of services to victims and

survivors of intimate partner violence, elder abuse, and sex trafficking. The secondarily reviewed documents will then be sent for finalization and typesetting with a final review of content and formatting.

OCDV's website uses a Google Translate plugin to provide general translation of content. OCDV plans to increase access for LEP people by including navigation information on the general website in the City's designated languages so that the LEP public may access translated documents without using a plugin.

## **V. Training**

OCDV staff and all onsite partner staff working at the FJCs receive Language Access training upon orientation and at least once a year. Training on Language Access primarily focuses on the delivery of services using telephonic interpretation when OCDV staff and FJC partner staff members do not speak the primary language spoken by a client or community member. OCDV aims to research the existence and availability of additional supports and training for OCDV staff and FJC partner staff providing services or information in non-English languages to better serve all victims and survivors of intimate partner violence, elder abuse, and sex trafficking.

### **Orientation Training**

All OCDV staff and FJC onsite partner agency staff members who work with members of the public are provided information on language access rules and instructions on using telephonic interpretation during orientation. This training is part of a larger orientation to OCDV and/or FJC policies and procedures. Outreach Team staff and FJC onsite partner agency staff receive and review information on how to access telephonic interpretation, information on engaging interpreters, how to recognize if there is a problem in the interpretation, how to resolve such problems, and where and how to report issues or complaints.

### **Yearly Language Access Training**

All OCDV staff and FJC partner agency staff members who work with members of the public are required to receive annual language access training. This training is scheduled to occur each March during required periodic staff meetings.

On-site FJC trainings are coordinated and presented by OCDV administrative staff member with a title of Executive Director, Deputy Director or Director of Programs and Community Partnerships. The FJC training is presented at all staff or discipline-specific meetings. Outreach staff receive the training provided by the Director of Outreach. Policy and Training Institute staff receive the training provided by the Assistant Commissioner of Policy and Training, Director of Policy and Training, Deputy Director of Policy and Training, Policy Advisor, or the Language Access Coordinator (LAC). The LAC will provide yearly trainings to those designated to provide the annual training to other staff.

### **Language Access Training Topics**

- Overview of Federal and State Laws
- Overview of Language Access history in NYC, including Executive Orders 41 (2003) and Executive Order 120 (2008)
- Overview of Local Law 30 (2016)
- Information on telephonic interpretation, including how to offer and use the services
- Information on the over 240 languages offered through contracted telephonic interpretation and how to troubleshoot issues of securing effective interpretation for less commonly encountered dialects or languages
- Information on process to provide positive and negative feedback on interpretation services, interpreter conduct, or issues securing telephonic interpretation

The trainings will include information that is site or discipline-specific, such as information on accessing telephonic interpretation in the field or using telephonic interpretation with victims and survivors of trauma.

## **VI. Record Keeping and Evaluation**

### **Language Service Tracking**

OCDV reports and tracks compliance with language access requirements as well as additional steps taken to provide meaningful access to services and information to all LEP New Yorkers. The LAC is responsible for retrieving language tracking data from each OCDV unit in order to review and report on that data in annual Language Access reports. The LAC is also responsible for receiving and resolving language access complaints and conducts quarterly reviews of language access data to identify trends or potential areas for improvement. Additionally, the LAC convenes quarterly meetings of the Language Access Cabinet to review information, assess quality of services, and identify strategies for improvement. The Language Access Cabinet is comprised of representatives from each of OCDV's units.

### **Family Justice Center Operations**

#### **Family Justice Centers**

Provision of language services is primarily tracked by the FJC client intake database and telephonic interpretation usage. All FJC clients meet with a screener upon their first visit, who records information in the FJC client intake database, including client's primary language and interpretation needs this database is maintained by DoITT. OCDV's FJC client intake database uses a list of 161 languages as well as provides an option of "other." If a client indicates a language that is not listed, the screener will select the "other" option and record in an open field the language spoken by the client. The limited information recorded in the FJC client intake database is available to other providers as needed, dependent upon clients' individual confidentiality and privacy requests. Reports can be run that aggregate the use of telephonic interpretation to provide services.



## **Outreach**

Outreach staff usage of telephonic interpretation can be tracked by their unique identification numbers in the telephonic interpretation bills. Additionally, Outreach Team staff are track the non-English language used at the outreach events or presentations.

## **Policy and Training Institute**

### **Domestic Violence Training Team**

The DV Training Team records the language in which the training is presented in an internal database.

### **Healthy Relationship Training Academy**

The Academy records the language in which each workshop or training is provided in an internal database.

## **VII. Resource Analysis and Planning**

### **Staffing and Contracts**

OCDV staff and FJC onsite partner agency staff members provide meaningful access to these services through telephonic interpretation and the provision of services in an LEP client's non-English language by a speaker who is fluent or sufficiently proficient in that language. OCDV does not currently track general outreach or the provision of services in a non-English language by a staff member who is fluent or sufficiently proficient in that language. The agency aims to develop a process to track that service provision to better capture language access at the FJCs and through outreach activities.

OCDV does not currently use selective certification to recruit language speakers; however, candidates with multilingual abilities are strongly encouraged to apply for positions. OCDV aims to identify means to require or prioritize language abilities in future contracts and other staffing agreements.

### **Improving Language Access Services**

OCDV will develop and implement a Language Services Feedback Form, available in the ten designated languages so that LEP clients may provide confidential feedback on the quality of language services provided. This survey, modeled after the New York City Department of Health and Mental Hygiene's (DOHMH) Language Services Feedback form asks: the type of language services the LEP person received on a specific date; level of satisfaction the LEP person had with the language services provided; and additional feedback or suggestions for improvement of language services. OCDV anticipates having this form available at its FJCs in FY19.

The information gathered from the Language Services Feedback form will inform OCDV's future Language Access Implementation Plan priorities and goals, as well as assist in identifying trends and opportunities for improvement. Additionally, OCDV will coordinate with MOIA and the Office of the Language Services Coordinator (OLSC) to ensure compliance with any other assessment or reporting requirements.

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

OCDV provides notification of language access services via outreach materials and the FJCs have onsite signage with notifications of rights to interpretation. When OCDV plans a public service announcement campaign, language access is considered in the provision of materials in languages other than English.

## **IX. Language Access Complaints**

### **Language Access and Complaint Notification**

Signage informing LEP clients of the right to an interpreter as well as the right to file a complaint with a manager and/or via 311 is posted in conspicuous locations throughout FJC facilities. This signage, provided by MOIA, provides information in New York City's top ten LEP languages – Spanish, Chinese, Russian, Haitian Creole, Bengali, Korean, Arabic, Urdu, French, and Polish.

### **311 Complaints**

If a client, provider or member of the public files a complaint or request to 311 about language access or for additional language services, that complaint or request is to be forwarded to the agency that the complaint or request referenced and to the OLSC within the Mayor's Office of Operations. Complaints routed to OCDV are then to be forwarded to the LAC for review and response. The LAC is to respond directly to the complaint, if possible and appropriate, or forward the complaint to the appropriate director or supervisor of the unit of the complaint's origin. The unit director or supervisor is to resolve the complaint and report the resolution back to the LAC.

### **Complaints to OCDV Staff**

If a client, provider or member of the public lodges a complaint to a director or supervisor of an OCDV work unit, that director or supervisor is responsible for recording the nature of the complaint and resolving the complaint. Upon resolution of the complaint, the unit director or supervisor is responsible for emailing a summary of the complaint and resolution to the LAC. This summary must include the date and location of the complaint, the nature of the complaint and any overarching, institutional, or systemic barriers contributing to the complaint or hindering or preventing its resolution. Complaints specific to contracted telephonic or in-person interpretation should be forwarded to the LAC for resolution. The LAC will communicate the resolution and any additional information stemming from it to the unit director or supervisor.

## **X. Implementation Plan Logistics**

### **Language Access Coordinator**

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## Language Access Plan Implementation Logistics

OCDV will update its Language Access Implementation Plan when major changes occur in organizational structure, upon meeting significant language access goals, or at least every three years, whichever occurs first. OCDV's Language Access Implementation Plan is posted on the Office website and updated versions will be posted when they occur. Additionally, OCDV will report annually to MOIA, OLSC, and any other required parties on annual language access data and the achievement of milestones beyond the legal requirements.

## Language Access Plan Implementation Timeline – FY18

**Table 7: Implementation Timeline for Document Translation**

Month	Implementation Timeline	
July 2017	Identify "most commonly distributed" documents	
August 2017		
September 2017		
October 2017		
November 2017		Plain Language training for key agency staff
December 2017		
January 2018	Revise documents for plain language	
February 2018		Send plain Language documents for translation
March 2018		
April 2018	Review translations	
May 2018		Receive corrected versions of translations
June 2018		
July 2018	All identified documents in the top designated languages	

## Language Access Plan Goals and Milestones – FY19 and FY20

**Table 8: Implementation Timeline for Future Goals**

Goal	FY 19				FY 20			
Translate second priority OCDV documents into LEP languages*	Plain language review							
		Identify Languages for translation	Send for translation	Review translations and finalize				
Review OCDV's online resources for language accessibility			Review website and NYC HOPE portal for ease of access and translation quality		Explore options for enhancing language access online			
							Implement changes where possible	
Track languages spoken by LEP callers to the FJCs	Discuss methods for data				Review data collected			
		Select method and implement tracking/data				Implement changes in data collection as necessary	Review any changes implemented	
Operationalize language services feedback for FJC clients	Develop client feedback form				Review data collected			
		Send form for translation	Review translations, finalize form and distribute to FJCs			Implement changes in form as necessary	Review any changes implemented	
Enhance services for LEP clients at the FJCs					Based on data collected from client feedback and calls to FJCs, discuss additional trainings and supports that may be needed for onsite staff and telephonic interpreters			
Prioritize language abilities in future contracts and staffing	Explore how language ability may be prioritized through contracts							
			Develop contracts that prioritize language abilities, particularly at FJCs				Implement new contracts	
Review OCDV's Emergency Preparedness plan for language accessibility	Review current plan and make updates							

\*These documents are distributed to service providers at city agencies and community based organizations and not strictly public facing. As such we do not anticipate translating these into all 10 LEP languages, but some subset that is relevant to service providers.