



Language Access Implementation Guide

New York City Department of Homeless Services

I. Agency Mission and Background

“THE MISSION OF THE DEPARTMENT OF HOMELESS SERVICES IS TO OVERCOME HOMELESSNESS IN NEW YORK CITY.

DHS PREVENTS HOMELESSNESS WHEREVER POSSIBLE AND PROVIDES SHORT-TERM EMERGENCY SHELTER AND RE-HOUSING SUPPORT WHENEVER NEEDED. THESE GOALS ARE BEST ACHIEVED THROUGH PARTNERSHIPS WITH THOSE WE SERVE, PUBLIC AGENCIES, AND THE BUSINESS AND NON-PROFIT COMMUNITIES.”

The Department of Homeless Services was established in 1993 and made an independent Mayoral agency in 1999. Since its inception, the work of DHS and its nonprofit partners has primarily focused on providing safe shelter, outreach services and helping individuals and families transition to permanent housing.

In June 2004, Mayor Michael R. Bloomberg released *Uniting for Solutions Beyond Shelter*, the City’s five-year action plan to end chronic homelessness. With the release of that action plan, the Mayor committed to reducing the number of individuals and families in shelter and on the streets by two-thirds in five years. These ambitious goals have required DHS to place greater emphasis on interventions that solve rather than just manage homelessness. These interventions include prevention services, rental assistance, and supportive housing, to name a few.

The action plan also acknowledges that DHS cannot solve homelessness alone. The agency is committed to continuing to build strong partnerships with our clients, various public agencies, and the non-profit and business communities.

In conjunction with other city agencies, DHS provides a number of services to the public including outreach services to the street homeless population, diversion services to assist individual and families stay out of shelter and in the community, temporary housing assistance, and aftercare services for clients who have moved out of shelter.

In general, clients access DHS services one of two ways, through outreach teams that encounter clients wherever they are found and through the six DHS intake centers: one for single adult men, three for single adult women, one for families with children, and one for adult families without minor children.

When a client completes intake, they are generally transferred to an assessment shelter, where the client’s unique needs can be assessed, and then on to a program shelter geared towards those needs identified during intake and assessment.

For more information on the Mayor’s five-year action plan, visit www.nyc.gov/endinghomelessness.

II. Agency Language Access Goals

The New York City Department of Homeless Services (DHS) has established a language access plan that will ensure our compliance with Local Law 73. It also addresses DHS' compliance with Executive Order No. 120 dated July, 22, 2008 entitled, CITYWIDE POLICY ON LANGUAGE ACCESS TO ENSURE THE EFFECTIVE DELIVERY OF CITY SERVICES.

In keeping with DHS' commitment to providing benefits and services to all eligible applicants, this plan ensures that language shall not be an obstacle to individuals with limited English proficiency.

The goal of this plan is to guarantee that persons eligible for social services receive them without undue delay or difficulty based on the language he or she speaks. Intake and placement should take no longer for LEP clients than it does for English proficient clients and the purpose of this plan is to ensure that this is true.

DHS serves a diverse population encompassing people with many different primary languages. Some of these individuals are unable to communicate in English. It is the responsibility of DHS staff to communicate to applicants and clients their rights and responsibilities as well as DHS policies.

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In general, clients access DHS services through the six DHS intake centers: 1 for single adult men, three for single adult women, one for families with children, and one for adult families without minor children. Through the intake and assessment process, each client's needs are identified and the client is directed to diversion services, given temporary housing placements, and/or connected with social services offered by other city agencies as determined by the client's particular circumstances.

Successful implementation of DHS' Language Access Plan hinges on smooth coordination across the agency. With the help of dedicated staff members, current shelter residents and new applicants alike are being notified of free interpretation services. The level of support, dedication and enthusiasm shown in laying the groundwork for the Plan proves that, at least in its implementation phase, it will be a success.

All LEP clients that utilize the language services outlined in this plan will be surveyed to evaluate the quality and efficacy of the DHS language access plan. Along with the data DHS will collect to track the usage of language services, the language access coordinators will use the surveys to determine whether new strategies are required to meet the language access needs of LEP clients. Guided by these determinations, the plan will be updated yearly.

III. LEP Population Assessment

DHS will utilize the City's Top 6 languages (Spanish, Russian, Chinese, Korean, Haitian-Creole, and Arabic) in conjunction with other languages identified as being commonly used among the shelter population, currently French, Polish, and Bengali. DHS expects to continue evaluating language usage continuously in order to ensure the DHS language plan remains current and serves the needs of the LEP clients who access DHS services. DHS will execute the Department of Justice "Four-factor Analysis" as follows:

- **Department of Justice Factor 1:**

The determination of the number or proportion of LEP individuals in DHS' service population begins when a person applies for shelter services in any of DHS' intake facilities. DHS workers screen all applicants for shelter to determine the applicant's primary language. Each applicant's primary language will be recorded and statistics regarding the primary language of all LEP clients will be compiled.

Information regarding LEP individuals accessing DHS services is also available by tracking Language Line usage. From January 2008 through December 2008, the top languages for which language line services were accessed were: Spanish, Chinese, Polish, Russian, French, and Bengali.

- **Department of Justice Factor 2:**

Determining the frequency with which LEP individuals come into contact with the DHS system will, by necessity, be an ongoing process. As discussed above, LEP individuals are identified during the application process and statistics regarding the primary language of all LEP clients will be compiled. This information will be periodically reviewed and compared with the number of overall applicants in order to depict accurately the frequency LEP individuals apply for shelter when compared with fluent English speakers.

- **Department of Justice Factor 3:**

The nature and importance of DHS stems from its mission to assist individuals in profound need of assistance. Temporary housing assistance is an essential city service to which all should have equal access.

- **Department of Justice Factor 4:**

As a New York City Agency, DHS has access to resources available to all other city Agencies, including the citywide contract for Language Line Services, which offers translation services in over one hundred and fifty (150) languages and has provided the Language Identification Cards. In addition, DHS has access to the citywide Language Bank, a database of multi-lingual city employees who have volunteered to assist in interactions with LEP individuals in their native languages.

IV. Implementation Plan Logistics

DHS has already taken great strides towards the completion of the language access plan and expects full implementation in January 2009. DHS has obtained, from the Mayor's Office of Operations, and is in the process of posting signage advertising free interpretation services in twenty two (22) languages. In addition, Language Identification Cards have been obtained to assist DHS staff, applicants and shelter residents find the appropriate language and access free translation services. Language Access advertising will be in place by May 2009.

Training programs have been developed with the goal of imparting the importance of the DHS language access policy in general as well as what specific steps can and should be taken when dealing with LEP individuals. These trainings have been administered for senior level DHS staff members and are incorporated into all DHS orientation programs for new employees. By June 2009, all front-line intake staff will have received language access training.

A framework is currently in place to identify essential Agency documents which must be translated and what languages they will be translated into. By June 2009, a database of essential documents translated into the City Top Six languages and the DHS top languages will be available to all front-line DHS staff.

Each DHS owned and operated facility has been required to identify dedicated telephones to facilitate access to Language Line translation services, and must include either speaker capabilities, the use of headsets or both.

DHS has designated the Executive Director of Equal Opportunity Affairs and the Director Planning, Development & Grants as the agency Language Assistance Coordinators to ensure compliance with Local Law 73 and Executive Order No. 120. Language Liaisons for the different DHS divisions will share responsibility for implementation plan and data reporting/monitoring.

There will be a Language Liaison for the Family Services, the Adult Services, and the Prevention Services divisions. Employees for each of those divisions that have direct contact with clients, whether in person at intake or assessment facilities or by phone to DHS headquarters, will or have already received language access training, and will have access to Language Line services

V. Service Provision Plan

DHS has been in contract with Language Line Services through the NYC Department of Information Technology & Telecommunication (DoITT) since October 1, 2006.

Interpretation Services

DHS staff works with all applicants for shelter at intake to determine the applicant's primary language. When an individual is determined to have a primary language other than English, the first priority is to determine their primary language and inform the individual of available language assistance services. The DHS employee conducting the screening is expected to use all available resources to determine the individual's primary language, including the employee's own fluency in the language if applicable. However, if a worker has difficulty determining a client's primary language, the worker should use the Language Identification Card or call the language line for telephonic language identification. Interpretations services will be available to all LEP clients wherever they access DHS services: at intake centers, shelters, in person or by telephone at DHS headquarters, and at DHS call centers.

During calendar year 2008, DHS clients accessed Language Line interpretation services 1514 times. With better advertising, DHS anticipates that this number will increase substantially.

Translation Services

DHS has identified essential public documents as any document which applicants for shelter or existing shelter residents are required to read, complete and/or understand in order to access services within the DHS shelter system. Utilizing the translation services of Language Line, these documents are being translated into, aside from the City's top six languages, three other languages identified by DHS as being commonly spoken among the shelter population: Polish, French, and Bengali.

As is the case with all DHS documents intended for use by our clients, DHS will take steps to ensure that translated documents utilize plain language to the extent possible, and are at an appropriate reading level. For quality control, DHS intends to utilize the City Language Bank. By June 2009, a database of essential documents translated into the City Top Six languages and additional DHS three will be available to all front-line DHS staff.

While the DHS website does provide some information about the agency, it is not used to communicate essential information about DHS services to the public. Currently, there are no plans to translate the DHS website.

Advertising Language Services

DHS will advertise the availability of language services to clients by using posters provided by the Mayor's Office of Operations and posting them at the entrances and throughout the intake centers. By May 2009, posters will be in place at all six DHS intake facilities. In addition, an identical flyer will be distributed to clients during intake and assessment.

Outreach

DHS Outreach teams will be equipped with "I Speak" cards and tasked with informing the street homeless population of the availability of language services.

VI. Training (for front-line, supervisory, and managerial staff)

To date, training in the implementation and execution of the language access plan has been given to all senior-level DHS staff and is currently incorporated in all orientation training for new DHS employees. For current employees, all DHS staff with client contact will receive language access training conducted by the Office of Equal Opportunity Affairs by June 2009.

In addition to providing a background understanding of the language access plan and its significance to the shelter population that DHS services, the training serves to acquaint those who will be dealing directly with applicants and residents with the methods to be used in implementing the plan.

By familiarizing DHS staff with the Language Identification Card and explaining the workings of the interpretation services provided by the contract with Language Line Services, DHS aims to arm its staff with the answers and solutions to any questions or problems they might encounter when dealing with LEP individuals. Once staff knows that Language Line, the Language Liaisons, and the Language Bank are the resources to turn to in order to identify and provide translation services for any language encountered, they will be more at ease with implementing the plan and interacting with LEP individuals.

The DHS Language Access Policy will be distributed to employees in conjunction with the training sessions. After all current employees have been trained, trainings will be conducted yearly.

VII. Record Keeping and Evaluation

DHS has used the language access services provided by Language Line Services to great effect since first employing its services in 2006. To date, DHS has used the service to provide numerous document translations, and has used the telephone translation service to assist in communications with LEP individuals on over 2300 separate occasions.

In order to ensure the quality of your agency's language access services, all LEP clients that utilize the language services outlined in this plan will be surveyed to evaluate the quality and efficacy of the DHS language access plan.

Along with the data DHS will collect to track the usage of language services, the language access coordinators will use the surveys to determine whether new strategies are required to meet the language access needs of LEP clients.

These surveys and the forms used to record each time language services are accessed will be collected by the Language Liaisons and maintained by the Language Access Coordinators to ensure the quality of the language services offered by DHS. At least yearly, The Language Access Coordinators will review the usage data and surveys to determine whether the top languages encountered by DHS staff has changed, whether the translated forms are correct and accurate, and whether the plan is meeting the needs of LEP clients.

To ensure that surveys and forms are completed each time an LEP client utilizes language services, DHS obtains usage data from Language Line that indicates the number of times Language Line is utilized and the frequency with which different languages are requested. This data will be compared with the survey and usage forms to determine DHS and its staff are in compliance with Executive Order 120.

VIII. Resource Analysis and Planning

DHS remains more than satisfied with the current language services provider, Language Line Services, which has consistently proved competent, convenient and cooperative in providing telephone interpretation services as well as written document translation services as part of their contract with DHS and the City. DHS will also continue to use the City-wide Language Bank as a supplementary service.