



Language Access Plan

Table of Contents

I. Agency Mission and Background	2
II. Agency Language Access Goals	6
III. LEP Population Assessment	7
IV. Implementation Plan Logistics	9
V. Service Provision Plan	13
VI. Training	15
VII. Record Keeping and Evaluation	16
VIII. Resource Analysis and Planning	17

I. Agency Mission and Background

Mission

The Department of Youth and Community Development (DYCD) was created in 1996, the result of a merger of the Community Development Agency (CDA) and the Department of Youth Services (DYS). DYCD provides the City of New York with high-quality youth, family and community human services programming. The agency's central task is to administer City, state, and federal funds to support community-based organizations (CBO) in the delivery of those services. Organizations selected for funding must be in touch with the needs of the people they serve, devoted to the highest principles of community service, and committed to sound fiscal management.

DYCD is a contracting agency. With a few exceptions, the agency does not provide direct services, but rather monitors almost 4,000 human service contracts it has with over 1,600 community-based organizations.

DYCD-Funded Contracted Services

Youth Workforce Development

Workforce Investment Act (WIA) In-School Youth (ISY)

WIA ISY workforce development programs provide high school students at risk of dropping out with academic enrichment and job readiness training.

Workforce Investment Act (WIA) Out-of-School Youth (OSY)

WIA OSY workforce development programs offer job readiness and other employment services, as well as educational programs for 16 - 21 year olds who are not in school and not working.

Young Adult Internship Program (YAIP)

YAIP is a program funded by Mayor Bloomberg's Center for Economic Opportunity (CEO). YAIP provides youth age 16 – 24 who are not in school and not working with short-term paid internships, job placements, case management and follow-up services.

Summer Youth Employment Program (SYEP)

SYEP is a seven-week summer employment initiative open to young people between the ages of 14 and 21. Participants are paid to work up to 25 hours a week in worksites that include government agencies, non-profits, summer camps, small businesses, law firms and retail establishments

The Out-of-School Time (OST) Initiative

OST is the largest municipally funded after-school initiative in the nation. These free programs offer a balanced mix of academic support, sports, recreational activities, and cultural experiences for elementary, middle school, and high school youth.

I. Agency Mission and Background

Beacon Community Centers

The Beacon Program supports 80 community centers located in public schools. These centers operate in the afternoons, evenings and weekends, on school holidays and vacation periods, and during the summer. Beacons provide a range of activities for young people including tutoring, college prep, photography, basketball, and martial arts. Services for adults and families include General Education Diploma (GED) training, English for Speakers of Other Languages (ESOL) programs, parenting skills workshops, and tenant education and advocacy.

Runaway and Homeless Youth (RHY) Services

DYCD funds RHY programs designed to protect runaway and homeless youth and, whenever possible, reunite them with their families. Young people are provided with the resources they need to get off the streets and stabilize their lives. The RHY continuum of care includes Drop-In Centers, Crisis Shelters, and Transitional Independent Living facilities.

Neighborhood Development Area (NDA) Programs

DYCD's NDA program funds a wide variety of human services programs, in 43 low-income neighborhoods, designed to lead to self-sufficiency and strengthening of communities. Programs include after school programs, domestic violence prevention, immigrant services, parent education, senior services and substance abuse education.

Literacy Programming

Adolescent Literacy

DYCD's Adolescent Literacy Program partners community organizations with middle schools to offer students in grades 6 - 8 after school programs designed to strengthen reading, writing, and communication skills. Students improve their literacy skills while working on engaging projects such as writing original plays or studying the environment.

Adult Literacy

DYCD's Adult Literacy Programs offers adult basic education and/or GED services to native speakers of English and non-English speakers.

Family Literacy

Family Literacy Programs offer a largely immigrant group of parents and their school-aged children the opportunity to work together on developing their reading, writing, and English language skills. Parents not only improve their English language and literacy skills, but also learn how to become full partners in their children's education.

I. Agency Mission and Background

Service Learning

DYCD's service learning program, Teen ACTION (Achieving Change Together In Our Neighborhoods), is funded by Mayor Bloomberg's Center for Economic Opportunity (CEO). Teen ACTION allows high-school aged youth between the ages of 13 and 21 to design and implement a meaningful service project in their community.

Fatherhood Initiative

DYCD's Fatherhood Initiative offers non-custodial fatherhood programming in three distinct categories: young fathers (16 - 24 years old), older fathers (over the age of 24) and fathers who are ex-offenders. The programs are designed to help fathers establish relationships with their children and to help them find employment so they can financially support their children.

Immigrant Services

DYCD supports more than 80 organizations providing a wide array of services to immigrants and refugees. These services include legal assistance, immigrant youth services, domestic violence program, immigrant family services and English for Speakers of Other Languages (ESOL).

Direct Services Provided by DYCD

Youth Connect

Youth Connect is an information and referral service for youth, families and service providers. Youth Connect's toll-free hotline receives over 45,000 phone calls annually. Callers are provided with information on, and referrals to, services related to employment, education, family conflict, and at-risk youth. Youth Connect also distributes a monthly e-Blast, or email newsletter, to subscribers which shares information on DYCD funded programs and invites subscribers to visit DYCD's website or email Youth Connect through an anonymous online form.

NYC Ladders for Leaders

NYC Ladders for Leaders program offers high school and college students age 16 - 21 the opportunity to participate in summer internships with some of the largest corporations and businesses in New York City. NYC Ladders for Leaders is managed directly by DYCD staff. In addition to meeting the age and school requirements, applicants must be New York City residents who are legally allowed to work in New York and possess basic English language proficiency.

I. Agency Mission and Background

Some of DYCD's functions in support of its contracted services that relate to language access include:

External Relations

External Relations covers all aspects of DYCD's external communications. The unit is responsible for representing the agency at community events and fostering relationships with community organizations and government agencies.

Program Promotional Material

DYCD occasionally offers print advertisements, including brochures and posters, to promote programs on a larger scale. These print advertisements invite interested parties to call 311 or Youth Connect for additional information.

Enrollment Forms and Applications

DYCD provides enrollment forms and applications for Beacon, OST and SYEP services. Funded organizations are then responsible for distributing the forms to program applicants and collecting the completed forms.

II. Language Access Goals

Language Access Goal

DYCD's Language Access Plan is designed to improve access to funded services for Limited English Proficient (LEP) individuals throughout the city.

Monitoring the Language Access Plan

During implementation, the Language Access Plan will be reviewed on a monthly basis by the Language Access Coordinators and the Language Access Committee. The Language Access Committee will meet on a quarterly basis after all of the Language Access milestones have been met to ensure each department continues to abide by the Language Access guidelines, and that new policies and procedures are adequately addressed.

The Language Access Committee will look for:

- Effectiveness of existing language assistance to LEP persons
- Changes in a program's LEP population
- Changes in the frequency of encounters with LEP language groups
- Changes in the relevance of programs to LEP language groups
- Correspondence from NYC residents regarding language access *i.e., Have there been compliments? Complaints?*
- Updates to the Volunteer Language Bank *i.e., Adding languages spoken by new hires*

III. LEP Population Assessment

LEP Population Assessment

The programs funded by DYCD are based on demographic data of eligible populations and community needs. In addition, DYCD obtains input from clients, service providers and community advocates.

DYCD's Planning, Research and Program Development (PRPD) Unit gathers the majority of its data from:

- Census and Demographic Data
- DYCD advisory bodies such as the Community Action Board, Neighborhood Advisory Boards and the Youth Board
- Service Provider Information
- Community Boards' Needs Assessment Statements
- Feedback from community advocates and experts

DYCD Identified 6 LEP Languages

During the Fourth Quarter of 2008, DYCD's Language Access Coordinators held individual meetings with representatives each of DYCD's funded program areas to assess their LEP population and identify the top 6 LEP Languages encountered within each service area.

The languages covered in DYCD's Language Access Plan are the following:

- Chinese (Cantonese and Mandarin)
- Haitian Creole
- Korean
- Russian
- Spanish
- Arabic

This list includes 5 out of the 6 citywide LEP languages, and replaces Italian with Arabic based on the feedback from our LEP population assessment.

Federal Department of Justice's (DOJ) "Four-Factor Analysis"

DOJ states that agencies "should apply a four-factor test to decide what steps to take to provide meaningful access to their programs and activities for LEP persons."

DOJ's Four Factors:

U.S. DOJ Factor 1 *The number or proportion of LEP persons served or encountered in the eligible service area.*

US DOJ Factor 2 *The frequency with which LEP individuals come in contact with the program.*

III. LEP Population Assessment

U.S. DOJ Factor 3

The nature and importance of the program, activity, or service provided by the program.

U.S. DOJ Factor 4

The resources available to the Department, and costs associated with different language service options.

DYCD Application of DOJ Factors

DYCD has considered the four DOJ factors in determining its Language Access Plan. In accordance with DOJ factors 1 and 2, programs funded by DYCD are based on data that identify, assess, and prioritize the needs of the communities and populations served. In addition to the recent review of program area needs, DYCD service providers track the frequency of LEP persons seeking services through enrollment and registration forms.

With respect to DOJ factor 3, DYCD's services are essential to youth and community development. As listed in the Agency Mission and Background section, DYCD's funded organizations offer services including literacy programs, immigrant services, workforce development and after school programs.

In developing the language access plan and in accordance with DOJ factor 4, DYCD considered all available and appropriate agency resources. In particular, DYCD considered the constraints associated with current service contracts.

IV. Implementation Plan Logistics

The Language Access Implementation Plan

The implementation of DYCD's Language Access Plan began in July 2008 and will continue throughout 2009.

Timeline and Major Milestones

1) Designate DYCD's Language Access Coordinators

Estimated Completion Date: Fourth Quarter 2008

DYCD's Language Access Coordinators are responsible for evaluating DYCD's Language Access needs and devising its Language Access Plan. The Language Access Coordinators will continue to lead all relevant activities at the agency. They are responsible for heading DYCD's Language Access Committee and overseeing the implementation of DYCD's Language Access Plan including the timely completion of DYCD's Language Access Goals.

Language Access Coordinators also:

- Oversee the creation, use, and maintenance of DYCD's Volunteer Language Bank
- Supervise the distribution of appropriate Language Access signage to each unit
- Support services for Limited English Proficient customers by training call center staff and front desk receptionists on the use of the language line

Currently, the Language Access Coordinators are:

- Director, Youth Connect
- Director, Office of Immigrant Initiatives

2) Formation of DYCD's Language Access Committee

Estimated Completion Date: Fourth Quarter 2008

In July 2008, DYCD formed a Language Access Committee consisting of representatives from each DYCD unit. The Committee meets monthly to discuss language access goals and report on the completion of Language Access Milestones.

Language Access Committee Members:

- Ensure the inclusion of Language Access requirements in his/her unit's Requests for Proposals
- Coordinate the inclusion of Language Access requirements in his/her unit's program monitoring tools
- Oversee the translation of relevant printed documents distributed directly to the public

IV. Implementation Plan Logistics

3) **Formation of DYCD's Volunteer Language Bank**

Estimated Completion Date: Fourth Quarter 2008

In August 2008, DYCD's Language Access Committee began collecting data on the languages proficiency of DYCD staff. Data was collected on languages staff can speak, write and/or read. The data will be made available to DYCD's Extended Cabinet during the Language Access Plan presentation in the first quarter of 2009 and posted on a shared network drive. Volunteer Language Bank staff will be asked to proof documents translated by the translation service and assist with correspondence written in languages other than English.

4) **Creation and Implementation of Customer Service Training**

Estimated Completion Date: Second Quarter/Third Quarter 2009

The Customer Service Group (CSG) at the Mayor's Office of Operations is currently (Fourth Quarter 2008) working with the Department of Citywide Administrative Services (DCAS) to incorporate language access and cultural sensitivity into re-developed training for front-line DYCD staff.

DYCD's Language Access Coordinator and Director of Staff Services have participated in the CSG's Customer Service Training Design Sessions. The design session was organized to give each city agency the opportunity to contribute to the planning of citywide customer service training. Appropriate staff will be required to participate in the customer service training on a yearly basis. Date and attendance will be documented for each training session. Specific staff will be trained to use additional tools, including the Language Line and Language Access "I Speak Cards" (See *Creation and Distribution of Signage*).

5) **Join DoITT's Language Line Contract**

Estimated Completion Date: First Quarter 2009

DYCD's Youth Connect has had a contract with AT&T's Language Line since its inception in 1992. AT&T's Language Line provides live, over-the-phone translation in 152 different languages. In the first quarter of 2009, DYCD will complete a task order to join DoITT's citywide Language Line contract to secure a more cost-efficient contract for services.

6) **Update Youth Connect's Call Tracking Software**

Estimated Completion Date: Second Quarter 2009

DYCD's Youth Connect has been working with the Information Technology unit to update its call center tracking software since the fourth quarter of 2008. The new software will be able to keep track of the number of language assistance requests as well as the type of language requests made. This will improve the quality of the information that we use to determine language needs in our communities. The database upgrades will be tested throughout the first quarter of 2009 and implemented by the second quarter of 2009.

7) **Creation and Distribution of Signage**

Estimated Completion Date: First/Second Quarter 2009

DYCD's contracts currently require all funded organizations to post signage that lists DYCD as a funding source and provides information on where to call to file comments and suggestions. The Language Access Committee will work on two sets of signage: one for DYCD's main offices; and the other for DYCD's funded organizations.

The signage for DYCD's main offices will provide directional information and list activities or services available on site. DYCD rarely receives visits from anyone outside of its contracted organizations.

DYCD receptionists will utilize tools developed by The Mayor's Office to assist agencies in the development of their Language Access plans and implementation of their language access services. These tools include standard signage and language identification tools created together with NYC & Company, Language Line, Health & Hospitals Corporation, and the Citywide Language Bank. The purpose of these tools is to raise awareness of free translation and interpretation services and to facilitate the process of identifying a customer's primary language.

The tools are:

- **Language Identification Desktop Display (8½ x 11") / Poster (11 x 17"):** a list of New York City's top 22 languages designating LEP customers to point to their language;
- **Guidelines for Accessing Interpreter Services:** a template that can be used as a reverse desktop display for city employees;
- **I Speak Card:** a card that LEP customers can use on future visits that designates their primary language.

The second set of signage will be posted on-site at funded community based organizations. The Language Access Committee will develop the language for a universal DYCD program sign. The sign will contain the same information in each of the DYCD selected 6 LEP languages. After the new signage has been approved by the Commissioner, it will be distributed to each unit's program managers who will then distribute to their programs. Funded organizations should have the new signage in place no later than the second quarter of 2009.

8) **Translation of DYCD Essential Public Documents**

Estimated Completion Date: Fourth Quarter 2009

Each Language Access Committee unit representative will be responsible for identifying essential public documents in need of translation, including advertisements, forms and applications, distributed directly to the public. DYCD will make essential documents easy-to-read by incorporating plain language and design principles when drafting materials.

IV. Implementation Plan Logistics

The translated documents will be made available to funded organizations via DYCD's Website and the DYCD Online system once they have been approved.

9) Update Contractual Requirements

Estimated Completion Date: Fourth Quarter 2009/First Quarter 2010

Each Language Access Committee unit representative will be responsible for reviewing his/her unit's current contracts and program monitoring tools and identifying the sections referring to signage and language access. The Language Access Committee will discuss DYCD's current contractual requirements for funded organizations and agree upon standard requirements for signage and language access. Each new Request for Proposals will include a section on Signage and Language Access and funded organizations will be expected to meet the new contractual obligations.

10) Update Program Monitoring Tools

Estimated Completion Date: Fourth Quarter 2009/First Quarter 2010

Each Language Access Committee unit representative will be responsible for reviewing his/her unit's program monitoring tools and identifying the sections referring to signage and language access. The Language Access Committee will create standard requirements for signage and language access consistent with the updated contractual obligations. DYCD will then monitor funded programs utilizing the updated monitoring tools, and be prepared to provide feedback to agencies regarding the quality of their language access services.

11) Translation of Key Sections of the DYCD Website

Estimated Completion Date: Third/Fourth Quarter 2009

In accordance with the Mayor's Office and the Department of Information and Telecommunications Technology (DoITT), the Language Access Coordinators will oversee the task of creating a "DYCD Overview" webpage. The Language Access Committee Unit Representatives will be asked to write a short description of their funded programs. The description will be included in the DYCD Overview webpage along with any public facing documents each unit distributes. The page will be translated into the 6 selected LEP languages by the Language Line Translation Service and reviewed by members of DYCD's Volunteer Language Bank. The DYCD Overview Webpage will go live once it has been approved by the Language Line Translation Service, members of the Volunteer Language Bank and the DYCD Commissioner.

After the text is finalized, DYCD will meet with DoITT to design and upload the new web pages. A menu will be added to the top of the DYCD homepage asking LEP visitors to click on the language they speak. The overview page will be available in DYCD's 6 LEP languages.

V. Service Provision Plan

Interpretation Services

As mentioned in the Implementation Plan Logistics Section, DYCD's Youth Connect will

- continue to use AT&T's Language Line to provide interpretation over the phone while the task order to join DoITT's citywide Language Line contract is being processed.
- work with the Information Technology unit to update its call center tracking software which will track of the number of language assistance requests and the type of language requests made through the call center

DYCD's Youth Connect staff and receptionists will have access to a telephone interpretation service. In FY 08, less than 600 of Youth Connect's 47,000 + callers made use of the Language Line. DYCD anticipates similar numbers in FY 09.

Contracting agencies will not have direct access to DYCD's interpretation service, but will have access to Youth Connect from Monday - Friday, 9 AM – 7 PM.

Translation of Essential Documents

DYCD will make essential documents easy-to-read by incorporating plain language and design principles when drafting materials in English. Essential documents will then be translated by the Language Line translation service into the 6 LEP Languages. Material translated by the Language Line service will then be reviewed by members of the Volunteer Language Bank to ensure clarity.

Essential public documents identified so far include:

- Agency Brochures
- Standardized Program Applications distributed by DYCD
- Other Essential Documents, including enrollment forms and parental consent forms

The translated documents will be made available to funded organizations via DYCD's Website and the DYCD Online system once they have been approved by the Language Line Translation Service, members of the Volunteer Language Bank and the Commissioner.

Signage

Signage at Program Sites

DYCD's contracts require all funded organizations to post signage at program sites. The required signs list DYCD as a funding source and provide information on where to call to file comments and suggestions.

V. Service Provision Plan

The Language Access Committee will update signage for DYCD's funded organizations and develop a universal DYCD program sign. The sign will contain the same information in each of the selected 6 LEP languages. After the new signage has been approved by the Commissioner, it will be distributed to each unit's program managers who will then distribute to their programs. Funded organizations should have the new signage in place no later than the second quarter of 2009 and signage will be incorporated into each unit's program monitoring tools.

Promotional Materials Regarding Language Access Services

DYCD promotes Youth Connect's toll-free telephone number on printed materials as its main number. By the fourth quarter of 2009, printed material with the toll-free number will have the phrase "For more information call" translated in the 6 LEP languages.

Outreach and Public Awareness

Participant recruitment and outreach for DYCD's programs are the responsibility of the funded community-based organizations. DYCD funded Immigrant Services programs currently perform outreach to LEP communities and provide ESOL classes, interpreters and legal representation. Other funded organizations will receive DYCD required printed materials, including signage, brochures and applications/enrollment forms, in the 6 LEP Languages. Each program is responsible for recruiting and advertising in the language of its target population.

Advertisements provided by DYCD, such as after-school program brochures and informational posters, will be translated into DYCD's 6 LEP languages. Print advertisements will be available at DYCD's reception areas, at funded program sites, and at community events. Flyers and handouts that are not printed in the 6 LEP languages will advertise Youth Connect's toll free number and its Language Line service. DYCD's email newsletters, which reach over 2,000 people a month, will also advertise Youth Connect and the Language Line service.

DYCD's External Relations and Youth Connect staff work hard to increase public awareness of DYCD activities. Staff will continue to attend community board meetings and town hall meetings, and distribute DYCD printed materials. Youth Connect receives over 45,000 phone calls annually and will continue to provide services to LEP residents through its Language Line.

VI. Training

Training

All of DYCD's employees will receive training regarding DYCD's Language Access Plan, use of the Language Line and LEP policies and Procedures. Trainings will be provided on an on-going basis, and updated as needed

Language Access Plan Training

The Language Access Coordinators will conduct a Language Access Plan presentation for DYCD's Extended Cabinet and the Language Access Committee in the first quarter of 2009, once the plan has been approved. The presentation will outline the logistics of implementing the Language Access Plan. The Extended Cabinet is made up of Directors, Assistant Commissioners, the Chief of Staff and the Commissioner. Each member of the Extended Cabinet is required to share information provided at these meetings with key staff. The Language Access Committee is made up of representatives from each of DYCD's program units. The Language Access Coordinators will document the date and attendance for each presentation.

Language Line Training

DYCD's Youth Connect currently provides training for Youth Connect staff on the use of telephonic interpreters. After DYCD successfully transitions to the Language Line citywide contract (first quarter 2009), Language Line staff will conduct training sessions for employees who will be using the service. Both Youth Connect staff and DYCD receptionists will learn how to access the new Language Line and will receive online tools and documents online to guide them.

Cultural Competency Training

The Customer Service Group (CSG) at the Mayor's Office of Operations is currently (fourth quarter 2008) working with the Department of Citywide Administrative Services (DCAS) to incorporate language access and cultural sensitivity into re-developed training for front-line staff. Training will include use of the Language Access Tools developed by the Mayor's office.

DYCD's Language Access Coordinator and Director of Staff Services have participated in the CSG's Customer Service Training Design Sessions. The Design Session was organized to give each city agency the opportunity to contribute to the planning of a citywide customer service training. After the new training has been completed (first/second quarter 2009), DYCD staff will be required to attend on a yearly basis. Date and attendance will be documented for each training session.

VII. Record Keeping and Evaluation

Quality of Language Access Services

All DYCD staff whose work puts them in direct contact with the public will take part in both customer service training and language line training. Front-line staff will be required to participate in the customer service training on a yearly basis.

DYCD's Youth Connect currently provides training for Youth Connect staff on the use of telephonic interpreters. When DYCD transitions to DoITT's Language Line citywide contract, Language Line will conduct training sessions for employees who will be using the services, both Youth Connect staff and receptionists, and provide tools and documents online to guide employees. Date and attendance will be documented for each training session.

In addition to training staff in how to work with LEP individuals, DYCD will ensure the competency of interpreters and translation services by:

- Using certified translators whenever possible
- Using the Language line for phone calls from LEP customers
- Using the Volunteer Language Bank to check the work of the translation service

Records of Language Services Provided

DYCD Youth Connect's planned software will be able to keep track of the number of language assistance requests as well as the type of language requests made. This will improve the quality of data regarding LEP calls from the community. The database upgrades will be tested throughout the first quarter of 2009 and implemented by the second quarter of 2009.

Finally, language access requirements will be integrated into funding contracts and requests for proposals. DYCD will seek organizations with the ability to serve the target population in the languages they speak. Program applications and enrollment forms will continue to request information on other languages spoken in a participant's household.

Once an organization receives funding from DYCD, site monitors from each program unit will perform routine site visits. Language access services such as signage and print advertisements will be recorded in the site monitoring tool.

Ensuring Compliance with the Executive Order

The Language Access Committee Plan will look for:

- Effectiveness of existing language assistance to LEP persons
- Changes in a unit's LEP population
- Changes in the frequency of encounters with LEP language groups
- Changes in the relevance of programs to LEP language groups
- Review of correspondence from NYC residents *i.e., Have there been compliments? Complaints?*
- Updates to the Volunteer Language Bank *i.e., Adding languages spoken by new hires*

VIII. Resource Analysis and Planning

Resource Analysis and Planning

DYCD will implement its approved language access plan in 2009. DYCD will rely in part on staff in-house to facilitate the plan. Internal resources include:

Language Line

DYCD currently has a contract with AT&T's Language Line. AT&T's Language Line provides live, over-the-phone translation in 152 different languages. In the first quarter of 2009, DYCD will complete a task order to join DoITT's citywide Language Line contract, which is less expensive than the DYCD's current Language Line contract.

Document Translation

DYCD currently uses the procurement process to contract services for document translation services. Document translation services are contracted out on a case by case basis. Once DYCD has been joined DoITT's citywide Language Line contract, the agency will use the document translation services provided by the contract. Use of the Language Line document translation service will save the agency time and money.

Volunteer Language Bank

In August 2008, DYCD's Language Access Committee began collecting data on the languages proficiency of DYCD staff. Data was collected on languages staff can speak, write and/or read. The data will be made available to DYCD's Extended Cabinet during the Language Access Plan presentation in the first quarter of 2009 and posted on a shared network drive. Volunteer Language Bank staff will be asked to proof documents translated by the translation service and assist with correspondence written in languages other than English.