

Mayor's Office to Combat Domestic Violence Language Access Implementation Plan

I. Agency Mission and Background

Mission

The Mayor's Office to Combat Domestic Violence (OCDV) formulates policies and programs, monitors the citywide delivery of domestic violence services, and works with diverse communities to increase awareness of domestic violence. OCDV works closely with community leaders, health care providers, City agencies, and representatives from the criminal justice system to hold batterers accountable and to create solutions that are critical to preventing domestic violence in New York City.

Direct Services

New York City Family Justice Centers

The New York City Family Justice Centers, administered by OCDV, reduce barriers faced by victims of domestic violence who are seeking help. These innovative Centers enable victims to meet with a prosecutor, speak with a trained counselor, and apply for housing and financial assistance in just one visit – all in their native language while their children play safely in the next room. By providing services in one location with on-site partnering City agencies and non-profit social service and civil legal agencies, the Centers are increasing the effectiveness of service delivery to break the cycle of violence. The New York City Family Justice Center Initiative is a private/public partnership of the Mayor's Fund to Advance New York City, a 501(c)(3) not-for-profit organization established to promote partnerships between the City and the private sector.

OCDV staff administer the day-to-day operations of the New York City Family Justice Centers. On-site government and non-profit partners provide a wide spectrum of services, including: counseling for victims and children; safety planning; meeting with a prosecutor; civil legal information on immigration and Family Court matters; children's room with organized activities; support groups; assistance in filing police and probation reports; English as a Second Language classes; services for the elderly and/or disabled; language interpretation; and voluntary spiritual support.

The New York City Family Justice Center in Brooklyn (BKFJC) opened in July 2005 and through the end of November 2008, there have been over 38,250 client visits representing over 13,150 adult domestic violence victims and there have been an additional 3,650 visits by children to the BKFJC Children's Room – Margaret's Place.¹ The New York City Family Justice Center in Queens (QFJC) opened in July 2008 and through the end of November 2008, there have been over 2,700 client visits representing 1,485 adult domestic violence victims and their 321 children. A New York City Family Justice Center in the Bronx is currently being created by OCDV to open in the Bronx in 2009.

¹ Named for Joe Torre's mother. The Joe Torre Safe at Home Foundation is one of our private funders.

II. Agency Language Access Goals

Language Access Initiatives Already Underway

From its inception in 2002,² OCDV has made providing information and services accessible to Limited English Proficient (LEP) persons a cornerstone of its mission.

TRANSLATED DOCUMENTS

- Domestic violence brochure
 - Provides general information on domestic violence and services.
 - Available in 11 languages: Arabic, Bengali, Chinese, English, French, Haitian-Creole, Hindi, Korean, Russian, Spanish, and Urdu.
- Sexual assault brochure
 - Provides general information on sexual assault and services.
 - Available in 14 languages: Arabic, Bengali, Bosnian, Chinese, English, French, Greek, Haitian-Creole, Hindi, Japanese, Korean, Russian, Spanish, and Urdu.
- Translation of materials
 - OCDV utilizes a contracted vendor for its translation of documents.
 - OCDV partners with domestic violence-specific community-based organizations to review the translations of documents to ensure quality.

OUTREACH AND EDUCATION

- *A Medical Providers' Guide to Managing the Care of Domestic Violence Patients within a Cultural Context*
 - Distributed to over 5,500 health care providers as a training and reference guide.
 - Developed by OCDV and the Department of Health and Mental Hygiene in 2003.
- *The City of New York Resource Directory of Domestic Violence Services*
 - Provides comprehensive information on services available for domestic violence victims citywide and includes information on City services as well as over 200 non-profit organizations' programs.
 - Each entry indicates which languages the provider can accommodate.
- Domestic Violence awareness campaigns
 - The 2002 and 2006 domestic violence awareness campaigns were placed on subway cars and platforms, bus shelters and public telephone booths among other locations.
 - The campaigns were available in both English and Spanish.

PROGRAMS

- New York City Healthy Relationship Training Academy (HRTA)
 - Established in 2005, HRTA provides peer-led workshops on dating violence and healthy relationships for young people ages 13-24 in New York City.
 - Starting in 2009, select Peer Educators will provide workshops in Spanish and distribute Spanish-language education materials.

² In November 2001, New York City residents voted to amend the City Charter to establish a permanent office that would comprehensively address issues of domestic violence.

- Language Line Program
 - In 2003, OCDV and the New York City Police Department partnered to pilot a program equipping police officers with dual handset telephones which had direct, instant access to interpreters in over 150 different languages in order to better assist immigrant victims of domestic violence in select precincts in Queens to reduce the use of children and neighbors as interpreters.
 - As of July 2005, all City police precincts now have direct, instant access to interpreters 24-hours a day to assist with the investigation of any crime through Language Line.
- New York City Family Justice Centers (currently operating in Brooklyn and Queens)
 - All New York City Family Justice Centers have multilingual staff from diverse community-based organizations located on-site.
 - All New York City Family Justice Centers are equipped with Language Line dual-handset telephones in key areas of the Center and all on-site staff can access Language Line from any Center telephone.
 - Large posters are placed in the lobby of the Centers near the security and reception areas which indicate that free interpretation services are available. The posters repeat the following message in many languages: “Point to your language and an interpreter will be called. Interpretation is provided at no cost to you.”
 - The Center’s Auto Attendant, which answers the main telephone number, is currently available in multiple languages. As the Brooklyn Center, it is available in English and Spanish and at the Queens Center it is available in Bengali, English, Hindi, Korean, Mandarin and Spanish.
 - Client Brochures which describe the services available at the Centers are currently available in English and Spanish. OCDV partnered with the Mayor’s Office of Adult Education to ensure proper use of plain language.

Goals of OCDV’s Language Access Plan

The goal of OCDV’s Language Access Plan is to provide meaningful access to all individuals seeking services at the New York City Family Justice Centers, including individuals with Low English Proficiency, so that neither language nor immigration status will be a barrier to receive help. Further, OCDV will continue to provide multilingual domestic violence information to the public through our education materials, which are available online. OCDV staff will continue to partner with both professional translation/interpretation companies and domestic violence community organizations to ensure quality translation of materials and interpretation services.

Evaluation

OCDV staff will continue to partner with both professional translation/interpretation companies and domestic violence community organizations to ensure quality translation of materials. As part of the monitoring of customer satisfaction at the New York City Family Justice Centers, semi-annual, bilingual focus groups will include a question pertaining to language services.

Quarterly, the Executive Directors will: evaluate the Language Line bills and intake forms for the purposes of identifying new languages that should be selected as key languages for translation of documents; will formalize recommendations on ways to improve language services

based on on-site partner feedback and client focus groups; and will work with the Language Access Coordinator on updating the OCDV Language Access Plan.

III. LEP Population Assessment

The languages identified through the Population Assessment are: 1) Arabic, 2) Bengali, 3) Chinese, 4) French, 5) Haitian-Creole, 6) Hebrew, 7) Hindi, 8) Korean, 9) Polish, 10) Russian, 11) Spanish, 12) Turkish and 13) Urdu.

Federal Department of Justice “Four-factor Analysis”

Since each of the New York City Family Justice Centers serve clients from the specific borough in which they are located, the Four-factor Analysis was conducted for each borough.

A. New York City Family Justice Center in Brooklyn

1. The number of LEP persons in the eligible service area

According to the 2006 American Community Survey, the following are the top six languages spoken at home in Brooklyn:³

- Spanish
- Russian
- Chinese (Mandarin and Cantonese combined)
- Yiddish
- French-Creole
- Italian

2. The frequency with which LEP individuals come into contact with the agency

The number of LEP individuals who seek services at the BKFJC and their primary languages are determined through three data sources:

- 1) Column A: Language Line telephone bills (Fiscal Year 2008)
- 2) Column B: Languages indicated on the Client Intake Form for instances where multilingual on-site partner staff provided services and did not need to use Language Line
- 3) Column C: Particular populations to whom on-site partners conduct special outreach

³ Based on the 2006 American Community Survey, available at <http://www.census.gov/acs>

Language	Column A Language Line bills: Top Six Languages (rank)	Column B Client Intake Form: Top Six Languages (rank)	Column C Special Outreach Programs
Arabic	✓ (4)	✓ (4)	✓
Bengali			✓
Chinese (Cantonese and Mandarin)	✓ (3)	✓ (3)	✓
Haitian-Creole		✓ (5)	✓
Polish	✓ (6)	✓ (6)	
Russian	✓ (2)	✓ (2)	✓
Spanish	✓ (1)	✓ (1)	
Turkish	✓ (5)		
Urdu			✓

**The following languages were identified for translation:
Arabic, Bengali, Chinese, Haitian-Creole, Polish, Russian, Spanish, Turkish, and Urdu**

Of the top 6 languages spoken among LEP persons living in Brooklyn, as indicated by the 2006 American Community Survey, only Yiddish and Italian are not common languages among LEP clients currently presenting at the BKFJC. In fact, in terms of Language Line usage, Italian is ranked 18th (tied with Hebrew, Thai and Wolof) and Language Line was never used for Yiddish.

3. Importance of the services to the LEP person

The Family Justice Centers provide services to all victims who reside in the Center’s designated borough or who were hurt by the abuser in that borough. The Centers serve all persons who meet the borough requirement regardless if they are LEP. Domestic violence can be complicated and victims seeking help often require a variety of services to be provided simultaneously in order to increase their safety. The specific services needed depends on each individual client’s situation but may include counseling, safety planning, meeting with a prosecutor, civil legal information, assistance in filing police and probation reports and/or English as a Second Language classes among many other services. Because each of these services are often critical, language assistance services are crucial. Additionally, it is important that victims can tell their story in their language particularly when filing police reports or petitions for orders of protection.

4. The resources available to the agency and the costs of providing various types of language services

The BKFJC has a designated City budget for purposes of interpretation and translation. On-site bilingual partner staff assist clients in their language as well.

B. New York City Family Justice Center in Queens

1. The number of LEP persons in the eligible service area

According to the 2006 American Community Survey, the following are the top six languages spoken at home in Queens:⁴

- Spanish
- Chinese (Mandarin and Cantonese combined)
- Korean
- Assorted Indic languages (e.g. Bengali, Hindi, Urdu)
- Russian
- Greek

2. The frequency with which LEP individuals come into contact with the agency

The number of LEP individuals who seek services at the New York City Family Justice Center in Queens and their primary languages are determined through three data sources:

- 1) Column A: Language Line telephone bills (8/1/08-10/30/08)
- 2) Column B: Languages indicated on the Client Intake Form for instances where multilingual on-site partner staff provided services and did not need to use Language Line
- 3) Column C: Particular populations to whom on-site partners conduct special outreach

Language	Column A Language Line bills: Top Six Languages (rank)	Column B Client Intake Form: Top Six Languages (rank)	Column C Special Outreach Programs
Bengali	✓ (6)	✓ (4)	✓
Chinese (Cantonese and Mandarin)	✓ (2)	✓ (2)	✓
French			✓
Hebrew			✓
Hindi			✓
Korean	✓ (5)	✓ (3)	✓
Polish	✓ (3)		
Russian	✓ (4)	✓ (6)	✓
Spanish	✓ (1)	✓ (1)	
Urdu		✓ (5)	✓

The following languages were identified for translation:

Bengali, Chinese, French, Hebrew, Hindi, Korean, Polish, Russian, Spanish and Urdu.

Of the top 6 languages spoken among LEP persons living in Queens, as indicated by the U.S. Census, only Greek is not documented among LEP clients presenting at the QFJC. In fact, Language Line has never been used for a Greek speaking client and it has never been indicated on a Client Intake Form.

⁴Based on the 2006 American Community Survey, available at <http://www.census.gov/acs>

3. Importance of the services to the LEP person

The Family Justice Centers provide services to all victims who reside in the Center's designated borough or who were hurt by the abuser in that borough. The Centers serve all persons who meet the borough requirement regardless if they are LEP. Domestic violence can be complicated and victims seeking help often require a variety of services to be provided simultaneously in order to increase their safety. The specific services needed depends on each individual client's situation but may include counseling, safety planning, meeting with a prosecutor, civil legal information, assistance in filing police and probation reports and/or English as a Second Language classes among many other services. Because each of these services are often critical, language assistance services are crucial. Additionally, it is important that victims can tell their story in their language particularly when filing police reports or petitions for orders of protection.

4. The resources available to the agency and the costs of providing various types of language services

The QFJC has a designated City budget for purposes of interpretation and translation. On-site bilingual partner staff assist clients in their language as well.

Utilization of the top 6 citywide LEP languages

The New York City top six LEP languages are Spanish, Chinese, Russian, Korean, Italian and Haitian-Creole.⁵

BKFJC: Korean and Italian are not highly represented among the clients at the BKFJC. However, Korean is ranked seventh in the Language Line interpretation usage.

QFJC: Italian and Haitian-Creole are not highly represented among the clients at the QFJC. However, Haitian-Creole is ranked seventh in the languages indicated on the Client Intake Form.

Summary: Identified LEP languages for the New York City Family Justice Centers

Six of the identified LEP languages for the BKFJC and QFJC are the same (Bengali, Chinese, Polish, Russian, Spanish and Urdu). Because the difference between the essential documents is minimal between the BKFJC and QFJC documents, the cost to translate documents for both Centers is low. Therefore, each of the Centers' essential documents will be translated into all thirteen of the identified languages of both Centers. The complete list is:

Identified Languages: 1) Arabic, 2) Bengali, 3) Chinese, 4) French, 5) Haitian-Creole, 6) Hebrew, 7) Hindi, 8) Korean, 9) Polish, 10) Russian, 11) Spanish, 12) Turkish and 13) Urdu

⁵ 2006 American Community Survey, available at <http://www.census.gov/acs>.

IV. Implementation Plan Logistics

While we have identified 13 LEP languages for the New York Family Justice Centers, current budgetary constraints require the language access implementation plan to proceed in two stages. The first stage will allow for the translation of essential documents into seven primary languages: 1) Arabic, 2) Bengali, 3) Chinese, 4) Haitian-Creole, 5) Korean, 6) Russian and 7) Spanish. These languages were chosen to be included in the first stage of the language access implementation plan based on the aforementioned analysis of the primary language of LEP individuals seeking services at the New York Family Justice Centers. Chinese, Russian and Spanish are among the top four LEP languages at both Family Justice Centers. Further, we considered any active outreach program targeting a particular LEP community. The BKFJC has on-going outreach to LEP Arabic and Haitian-Creole communities, while the QFJC has on-going outreach programs intended for LEP Bengali and Korean communities.

OCDV will translate BKFJC and QFJC essential documents into the other six identified languages during the next fiscal year. These languages include: 1) French, 2) Hebrew, 3) Hindi, 4) Polish, 5) Turkish and 6) Urdu.

Implementation Timeline

First Stage: Translation of Primary Languages

- Confirm identified languages for the BKFJC and QFJC December 2008
- Translate BKFJC and QFJC essential documents into identified languages March 2009
- Update website with information in the identified languages April 2009
- Train staff at the BKFJC and QFJC on the new Language Access Plan June 2009
- Proof-read translation, print and distribute essential documents June 2009
- Incorporate language assistance services in public outreach July 2009

Second Stage: Translation of Other Identified Languages

- Confirm identified languages for the BKFJC and QFJC December 2008
- Verify identified languages for the BKFJC and QFJC December 2009
- Translate BKFJC and QFJC essential documents into identified languages March 2010
- Update website with information in the identified languages May 2010
- Proof-read translation, print and distribute essential documents June 2010
- Incorporate language assistance services in public outreach June 2010

Major Plan Milestones

- Update website with information in the primary identified languages April 2009
- All BKFJC and QFJC client brochures printed in primary identified languages June 2009
- Train staff at the BKFJC and QFJC on the new Language Access Plan June 2009
- Incorporate language assistance services in public outreach in primary identified languages July 2009
- Update website with information in the other identified languages May 2010
- All BKFJC and QFJC client brochures printed in other identified languages June 2010

Key OCDV Implementation Staff and Roles

- Assistant Commissioner for Administration (Language Access Coordinator)
 - Coordinate the quarterly review of the plan.
 - Monitor the overall success of the plan and ensure that the public is informed as to the language services available at the FJCs.
- Director of Communications
 - Incorporate accessible language in press documents as appropriate.
 - Coordinate updates to the website to provide important information about domestic violence and help available in multiple languages.
- Executive Director, New York City Family Justice Center in Brooklyn
 - Monitor usage of language interpretation services.
 - Identify new languages in which to translate key documents based on Language Line bills and FJC intake form data.
 - Review focus groups information to inform program changes as needed.
 - Perform outreach to communities to inform about language services at the FJCs.
- Executive Director, New York City Family Justice Center in Queens
 - Monitor usage of language interpretation services.
 - Identify new languages in which to translate key documents based on Language Line bills and FJC intake form data.
 - Review focus groups information to inform program changes as needed.
 - Perform outreach to communities to inform about language services at the FJCs.

V. Service Provision Plan

a. Interpretation Services

LEP clients who present at the New York Center Family Justice Centers

- The Centers operate primarily as walk-in centers. Those LEP clients who appear at this walk-in Center are assisted in their language by either on-site bilingual partner staff or through telephonic interpreters. All Centers are equipped with Language Line dual-handset telephones in key areas of the Centers and all on-site staff can access Language Line from any Center telephone.
- Large posters are placed in the lobby of the Centers near the security and reception areas that indicate that free interpretation services are available. The posters repeat the following message in many languages: “Point to your language and an interpreter will be called. Interpretation is provided at no cost to you.” This allows clients to communicate their language to the staff immediately upon first entering the Centers. Small language cards are also distributed to on-site partner staff.

LEP clients who call the New York Center Family Justice Centers

- For those LEP clients who call the Centers, they will first be assisted by the multilingual Auto Attendant which answers the main telephone number. At the BKFJC, the Auto Attendant is currently available in English and Spanish. At the QFJC, the Auto Attendant is currently available in Bengali, English, Hindi, Korean, Mandarin and Spanish
- Once the LEP caller is connected to an on-site partner staff members, the Language Line telephonic interpretation can be utilized as needed.

Anticipated volume

- Currently, language interpretation is a cornerstone of services at the New York City Family Justice Centers. It is anticipated that the volume of interpretation services provided through telephonic interpretation services will remain near its current rates of 3,000 minutes/month at the BKFJC and 1,800 minutes/month at the QFJC.
- In addition to telephonic interpretation services The BKFJC and QFJC will continue to house on-site bilingual partners.

b. Translation of written material

Essential public documents

- Any material given directly to clients by FJC administrative staff members that clients need to complete or read on their own is considered an essential document.
- As of December 2008, these materials include:
 - Client brochures
 - Client needs sheets
 - New client visit checklist
- A contracted vendor will translate the documents. Each translation will be proofread by a service provider familiar with domestic violence services who reads in the particular language.
- The identified languages are 1) Arabic, 2) Bengali, 3) Chinese, 4) French, 5) Haitian-Creole, 6) Hebrew, 7) Hindi, 8) Korean, 9) Polish, 10) Russian, 11) Spanish, 12) Turkish and 13) Urdu.

Plain language guidelines and standards

- OCDV regularly consults with the Mayor's Office of Adult Education. They have reviewed the BKFJC and QFJC client brochures to ensure plain language standards.

Website translation

- In 2009, we will place links on the OCDV homepage that will direct LEP clients who speak the identified languages to a dedicated page in their language. These web pages will provide information regarding domestic violence resources, including the QFJC and BKFJC.

Signage at public service centers

- Most of the internal New York Center Family Justice Center directional signs are symbols or colored lines painted along the walls indicating professional area (administration, civil legal, criminal justice, and advocacy) and do not include any text.
- External signs feature the New York Center Family Justice Center logo.

Outreach and public awareness of language assistance services

- Since the inception of the New York Center Family Justice Centers, language assistance services have been a critical part of regular services and past press releases indicate the availability of language assistance services. All future press releases will include language assistance services as appropriate.

- Regular outreach at non-profit organizations, faith organizations, health care settings, and other community locations is a part of the operations of the Centers. This outreach has and will highlight the availability of language access services.

VI. Training

Required training

All on-site partner staff are required to attend mandatory orientation which includes training on the availability and usage of the telephonic interpretation services. Center administrative staff provide support to the on-site partner staff as needed.

- The orientation training is provided monthly and includes how to identify a client's primary language, the use of dual hand-set telephones and the use of telephonic interpreters.
- To ensure accuracy of information, staff from Language Line, Inc. has trained the Center's administrative staff.
- All on-site partners will be provided with a copy of the OCDV Language Access Plan.
- During regular on-site partner meetings starting in May to June 2009, staff will be briefed on the Language Access Plan and will reinforce the language assistance services that are available at the BKFJC and QFJC.

Cultural competency training

- The QFJC offers quarterly cultural competency training sessions that all on-site staff must attend at least once.
- The BKFJC offers bi-monthly cultural competency training sessions that all on-site staff must attend at least once.
- Both locations hold monthly Task Force Meetings during which experts present on domestic violence best practices.
- In addition, most on-site partners provide their own in-house training at their home agency location.

VII. Record Keeping and Evaluation

Ensuring quality of language assistance services

- The New York City Center Family Justice Centers will continue to utilize a contracted vendor to provide telephonic interpretation and written translation services. This vendor performs its own internal review of the quality of interpretation and translation.
- Each document translation will be proofread by a service provider familiar with domestic violence services who reads in the particular language.
- The Executive Directors of the Centers will continue to serve as point persons for all on-site partner staff to share feedback on the quality of language assistance services.
- In 2008, OCDV implemented a program to monitor customer satisfaction at the New York City Family Justice Centers which includes semi-annual, bilingual focus groups. In 2009, we will incorporate a question pertaining to language services into the focus groups.

Recording volume of language services provided

- The Executive Directors of the Centers regularly review their monthly Language Line bills and Client Intake Forms for language service volume and emerging needs.

Ensuring compliance with Executive Order 120

- The Mayor's Office to Combat Domestic Violence administers the New York City Family Justice Centers and the BKFJC and QFJC Executive Directors will continue to monitor the quality and volume of language services through quarterly reviews monitoring emerging language needs.
- The Language Access Coordinator will ensure that OCDV continues to comply with Executive Order 120 through activities described above.

VIII. Resource Analysis and Planning

Current agency resources

- OCDV has an existing budget for interpretation and translation services for the New York City Family Justice Centers. The Centers will also continue utilizing existing on-site bilingual partner staff.
- OCDV will continue utilizing the DOITT citywide contract to provide telephonic interpretation and translation.
- OCDV staff will continue to train Center on-site partner staff on the use of telephonic interpretation including using dual-handset telephones.

Volunteer language bank

- Each New York City Family Justice Center maintains a list of on-site partners, their weekly schedules and the languages they speak.
- Clients are assigned to on-site partner staff according to several factors including service needs and language.

Utilization of citywide resources

- Many of the on-site partner organizations have existing contracts with the City to provide domestic violence services. By housing this staff at the New York City Family Justice Centers, clients are often able to speak to case managers in their preferred language. Telephonic interpretation is also available to on-site partners when on-site partner staff do not speak the preferred language of the client.
- Any certification test made available by the City to assure appropriate level of language skills will be provided as an option for on-site partner staff to be certified.
- OCDV will utilize materials developed by the City or Language Line, Inc. such as "I speak cards" and "Interpretation Services Available" posters as appropriate.