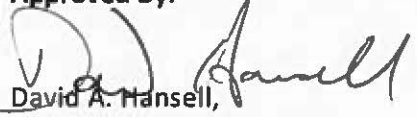


Language Access Policy

Approved By:  David A. Hansell, Commissioner	Date Issued: <u>7/21/2021</u>	Number of Pages: 19	Number of Attachments: 3
Related Laws: 42 U.S.C. §§ 2000d, 12131-12134; The Americans with Disabilities Act; Section 504 of the Rehabilitation Act; Local Law 73 of 2003; P.L. 101-336; P.L. 110-325; N.Y. Exec. Law § 296; Local Law 30 of 2017; Executive Order 120; Executive Order 26; N.Y.C. Admin. Code § 8-107 Title VI: Civil Rights Act of 1964 (42 USC §2000d) Federal E.O. 13166 (August 11, 2000); 16-OCFS-INF-05	ACS Divisions/Provider Agencies: Child Protection; Preventive Services; Child and Family Well- Being; Youth and Family Justice; Family Court Legal Services; Family Permanency Services	Contact Office /Unit: Elian Maritz, Esq. Director of Immigrant Services and Language Affairs elian.maritz@acs.nyc.gov 212-676-9008	
Supporting Regulations:	Supporting Case Law:	Bulletins & Directives: New York State Child Protective Services Manual (2020), Ch. 1, Sec. H, Page H-1. New York State Child Protective Services Manual (2020), Ch. 6, Sec. F, Page F-2. 16-OCFS-INF-05: Provision of Services to Persons with Limited English Proficiency (LEP)	
Key Words: Blind; braille; Language access; limited English proficient; LEP; deaf; hard of hearing; interpretation; interpreter; translation; telephonic; VIR; visually impaired; voucher	Related Policies: Americans with Disabilities Act (ADA) Procedure, Procedure # 2011/08.	Supersedes: <ul style="list-style-type: none"> • ACS Memorandum, Interpretation Services for Deaf and Hearing-Impaired Children and Family Members, dated March 13, 2007. • Expedited Telephonic Interpretation Services • Available for Clients with Limited English-Speaking Ability 	

		<ul style="list-style-type: none"> • Interpretation Services for Deaf and Hearing-Impaired Children and Family Members Working with LEP Clients • ACS Memorandum, Face-To-Face Interpretation, Telephonic and Translation Services, dated October 22, 2007. • ACS Policy, Working with Limited English Proficient (LEP) families, dated April 25, 2011. • ACS Memorandum, Interpretation Services for Deaf and Hearing-Impaired Children and Family Members dates, dated April 23, 2012.
<p>Related Forms and Appendices:</p> <p>Appendix A: Language ID Cards</p> <p>Appendix B: Guide for VRI – Video Remote Interpretation</p> <p>Appendix C: Guide for Division of Children and Family Well-Being</p> <p>Appendix D: Guide for Division of Child Protection</p> <p>Appendix E: Guide for Division of Youth and Family Justice</p> <p>Appendix F: Guide for Division of Prevention Services</p> <p>Appendix G: Guide for NYC Children</p> <p>Form 1: CS-1250A – Interpretation Services 2-Hour Limited Voucher</p> <p>Form 2: CS-1250B – Interpretation Services 4-Hour Extended Voucher</p> <p>Admin 048; Admin 050;</p>		
<p>SUMMARY:</p> <p>This policy provides guidance for the Administration for Children’s Services (ACS) and its contracted agencies to provide interpretation and translation services for children and families who have limited proficiency in English (Limited English Proficient or LEP). This policy replaces the 2007 Memorandums entitled “Face-To-Face Interpretation, Telephonic and Translation Services” and “Interpretation Services for Deaf and Hearing-Impaired Children and Family Members,” the 2011 Policy entitled “Working with Limited English Proficient (LEP) Clients,” and the 2012 Memorandum entitled “Interpretation Services for Deaf and Hearing- Impaired Children and Family Members.” Furthermore, this policy adopts language from NYC Local Law 30 of 2017, which improved access to city services for those with limited English proficiency LEP.</p>		
<p>SCOPE:</p> <p>The policy applies to all ACS employees and ACS contracted providers who work directly with the children and families of New York City.</p>		

Table of Contents

I. Introduction	4
II. Definitions.....	5
III. General Procedure for Providing Language Accessible Services to LEP Individuals and Families	7
A. Informing and Identifying Families	7
B. Provide Interpretation Services for Every Spoken Communication with Individuals and Families	9
E. Provide Translation Services in Every Written Communication with the Family	12
F. Document the Use of Language Assistance Services	13
1. ACS staff and provider agency staff shall use the tools described in this section to inform the LEP individual(s) of the availability of free language assistance services and identify the preferred language of the LEP individual(s).	15
2. Signage	15
3. Language Identification Card.....	15
H. Use of Bilingual Staff for Interpreting	15
IV. Issues and Questions Regarding Language Access Services	16

I. Introduction

- A. The purpose of the Administration for Children's Services (ACS) Language Access Policy is to make certain ensure that New York City's children and families with limited English proficiency have access to all programs and services provided by ACS and its contracted providers.**
- B. This policy emphasizes ACS' mission to protect the safety and well-being of all of the children of New York City, which includes providing access to services for children, parents, and caretakers who are Limited English Proficient (LEP) individuals. All ACS families have the right to free interpretation services. Promoting access to services through language assistance is critical for effective staff interaction with families to improve outcomes for children and families.**
- C. Individuals should not face obstacles to receiving any ACS services, including but not limited to:**
 - 1. Child welfare;**
 - 2. Community partnership;**
 - 3. Safe sleep; and/or**
 - 4. Juvenile justice services for which they may be eligible because they do not speak English as their primary language and have a limited ability to understand, read, write, or speak English to communicate with ACS staff and contracted provider agency staff.**
- D. As recipients of federal funding, ACS and its contracted providers are covered by Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act, and the American Disabilities Act and shall take reasonable steps to provide meaningful access to their programs and services to LEP families. In addition to the laws previously mentioned, this policy is consistent with other federal, state, and local laws.¹**
- E. Local Law 30² requires ACS to provide language access services. Such services include translating commonly distributed public facing documents (excluding documents from legal processes, pleadings, and papers) into ten (10) Designated Citywide Languages**

¹ See Title VI of the Civil Rights Act of 1964; Local Law 73 of 2003; Local Law 30 of 2017; and Executive Order 120.

² See Local Law 30 of 2017.

and providing interpretation services and multilingual signage in those ten 10 languages.³ ACS is required to develop and implement language access implementation plans to describe how such services will be provided. Local Law 30 also mandates monitoring and reporting on such services. ACS provider agencies shall request translations of commonly distributed public facing documents from ACS. ACS is committed to providing language and interpretation services to all clients who need these interpretation or translation services. Our interpretation services can provide interpretation of languages, including American Sign Language, and translations into the ten (10) Designated Citywide Languages, including transcription into braille.

F. ACS' Standard for Culturally Respectful Practice

ACS is committed to working with children, youth, and families in a manner that is respectful of all cultural backgrounds and circumstances. Accordingly, ACS and provider agency staff must be sensitive to the beliefs and values of all families. ACS staff and provider agencies are prohibited from imposing personal, organizational, and/or religious values and beliefs on any children, youth, or families, to justify discrimination, harassment, or disrespectful treatment because of their sexual orientation, gender identity, and/or gender expression, race, ethnicity, religion, national origin, cultural heritage, LEP status, and disability. ACS and provider staff should never allow their own cultural, religious, or personal values and beliefs to interfere with their responsibility to provide unbiased information and high-quality services.

II. Definitions

- A. Bilingual Staff – Staff who can easily and accurately speak and/or write in an additional language other than English easily and accurately.
- B. CONNECTIONS (CNNX) – The New York State automated system designed to create a single integrated statewide system for collecting and recording child protective, prevention, foster care, adoption, and Close to Home information.
- C. Commonly Distributed Documents – ACS documents most often provided to families that contain or elicit important and necessary information regarding the provision of services, i.e., including those relating to:
 - 1. Program participation (e.g., intake and consent forms);

³ See Section II for definitions.

2. Reduction, denial, or termination of services or benefits and the right to appeal such actions;
 3. Actions and proceedings affecting parental custody (excluding court filings);
 4. The recipient's awareness of rights, requirements, or responsibilities; and
 5. Time-sensitive or required responses from an LEP individual.
- D. Designated Citywide Languages – The top ten (10) languages spoken and read by the LEP population of New York City as determined by the Department of City Planning and the Office of the Language Services Coordinator, based on United States census data; and the top four (4) languages spoken and read by the population served, or likely to be served, by the agencies of the City of New York, based on language access data collected by the Department of Education, excluding the languages designated based on United States census data. .
- E. Interpretation Services – Contemporaneous conversion from one language to another. Interpretation services can be provided face-to-face, over video, or telephonically.
- F. Language Access Contract Manager – The ACS staff member who manages all five (5) Task Orders from the Department of Citywide Administrative Services (DCAS) Master Contract and all five (5) Language Access contracts, which are:
1. In-Person Contract;
 2. Sign Language Contract;
 3. On-Site Spanish Contract;
 4. Telephonic Contract; and
 5. Document Contract.
- G. Language Access Coordinator – The ACS Director of Immigrant Services and Language Affairs (ISLA), who is responsible for overseeing the drafting of ACS' Language Access Implementation Plan and Language Access Annual Report.
- H. Language Access Implementation Plan – Document prepared by the Language Access Coordinator that describes how language access services will be provided and how to secure meaningful access to information and direct public services.

- I. Language Assistance Services – Interpretation services and/or translation services provided by bilingual personnel, or contracted language assistance vendors, to an LEP individual in the individual's preferred language allowing the individual to communicate effectively with ACS and its provider agencies.
- J. Language Identification Card—A card from the Mayor's Office of Immigrant Affairs that lists the languages most frequently encountered in North America.
- K. Language Services Vendor – The vendor that provides interpretation and/or translation services, including sign language interpretation.
- L. Limited English Proficient (LEP) – A person whose preferred language is not English and has a limited ability to read, speak, write, or understand English, including individuals who use American Sign Language (ASL) or other sign languages.
- M. Plain Language – Writing designed to make the reading, understanding, and acting upon such writing easier for the audience; writing that avoids technical, legal, or specialized terms.
- N. Preferred Language – The language in which an individual chooses to communicate.
- O. Provider Agency – An organization or agency contracted with ACS for the provision of services, including those for child welfare services, juvenile justice, community partnership, and safe sleep.
- P. Translation Services – Written conversion of documents from one language to another.
- Q. Video Remote Interpreting (VRI) – Off-site video technology that allows interpreters to interact with clients and families face-to-face through video calling.

III. General Procedure for Providing Language Accessible Services to LEP Individuals and Families

A. Informing and Identifying Families

- 1. At initial contact with an LEP individual(s), ACS and provider agency staff must inform families of their right to free interpretation and translation services when communicating with ACS and its provider agencies.
- 2. ACS and provider agency staff shall proactively initiate the conversation about the individual's/family's preferred language, rather than waiting for the family to ask for interpretation. ACS staff shall convey to the individual/family that they have the

right to receive free interpretation and translation services, arranged by ACS or the provider agency, and that there will be no negative consequences for doing so. ACS and provider agency staff shall not make any negative inferences about an individual or family based on their language needs.

3. ACS can provide free interpretation for all staff-client contact, including, but not limited to, casework interactions at ACS/provider agency offices or in the family's home. Examples of contacts include, but are not limited to, Family Team and Permanency Planning Conferences, other conferences, meetings, sibling visits, family visits, and phone contact. ACS staff and provider agency staff may use supports, such as the Language Identification Card or Google Translate, for brief or informal exchanges such as introductions or determining what language supports are needed. A person may not be denied services due to his or her inability to communicate with ACS staff.
4. ACS and provider agency staff shall ask LEP individual(s) which language they choose to communicate in, both verbally and written, even if the individual(s) appears to have some proficiency in English, as the individual(s) may still prefer another language. Staff shall not rely on their own assessment of the LEP individual's proficiency when assessing the need for an interpreter. If an LEP individual requests an interpreter, an interpreter must be provided at no cost.
 - a. Families may also request an interpreter at any time during their case, even if they previously declined interpretation. Staff shall periodically re-evaluate the individual's/family's language needs, as families may only realize they need interpretation as the case progresses and becomes more complex.
 - b. ACS and provider agency staff can request interpretation services, even if the LEP individual has declined interpretation services, if the ACS and/or provider agency staff believe it to be necessary for clear communication.
5. If ACS or provider agency staff cannot verbally identify the preferred language of the LEP individual/family, staff shall utilize a Language Identification Card (see attached Appendix A or the Language Line App list of languages) or a telephonic interpreter to identify the preferred language of the LEP individual(s) and inform families of their right to free interpretation services
6. For LEP families and individuals who are deaf or hard of hearing, ACS staff and provider agency staff must inform the family or individual of the availability of, and right to access, free interpretation services. ACS and provider agency staff must also

refer to the Americans with Disabilities Act (ADA) Procedure to assess whether reasonable accommodations are needed to ensure the client(s) receives equal access to the programs, activities, and services of the agency.

7. For LEP families and individuals who are blind or cannot read written English, ACS staff and provider agency staff must inform the family or individual of the availability of, and right to access, free translated and/or transcribed documents.

B. Provide Interpretation Services for Every Spoken Communication with Individuals and Families

1. ACS and provider agency staff shall arrange for these interpretation services for children or for family members, for effective communication.
 - a. Interpretation services must be provided for all in-person interactions between staff and LEP families, including conferences, meetings, sibling and family visits, and all CPS contacts regardless of where the interaction occurs.
 - b. Interpretation services must also be provided for all telephone conversations between staff and LEP families.
2. Unless otherwise noted, staff *must not* use the individual's family, friends, or neighbors to interpret; staff must use interpretation services. See the corresponding attachments for additional information on staff requirements for interpretation services, including division-specific information.
3. When the LEP individual(s) has requested interpretation services, staff must arrange for such services for all subsequent home visits and planned interactions with the individual or family, and the preferred language must be noted in the case file or record.
4. For interactions that require the presence of both ACS and provider agency staff⁴, ACS shall provide the interpreter. Specifically, ACS has retained interpretation services for the following circumstances:
 - a. When ACS or a provider agency maintains case management and case planning responsibility; and/or
 - b. When ACS makes a referral for the individual/family for services to a provider agency;

⁴ Provider agency staff includes staff from both Prevention and Foster Care contracted agencies.

- c. When ACS staff or provider agency staff convenes a meeting or is initiating the need for a meeting or discussion.⁵
- 5. Interpretation services are available 24 hours a day, seven (7) days a week. For LEP families and individuals who are deaf and hard of hearing, hearing-impaired, staff must request an ASL interpreter in advance of the scheduled home visit or planned interaction, as detailed in the Appendix.
- 6. For Deaf and Hard of hearing-impaired individuals and families, when visits cannot be scheduled or planned in advance, staff must still request an appropriate ASL interpreter. In situations related to Child Protective Specialist (CPS) home visits, if staff is unable to obtain an interpreter and a visit is required, the CPS must assess whether there are emergent safety concerns requiring that the CPS make immediate contact with the child(ren) and request VRI services. If VRI services are not available, CPS must conduct the visit without an ASL interpreter or Certified Deaf Interpreter (CDI), and CPS must make a follow-up visit with an ASL or CDI within 24 hours or as soon as possible.
- 7. Telephonic interpretation services shall be used for interactions expected to last less than thirty (30) minutes. Those interactions for which telephonic interpretations can be used include:
 - a. Arranging meetings with LEP individuals and families;
 - b. A call from an LEP individual to ACS staff;
 - c. A visit to an ACS office, without an appointment, by an LEP individual(s).
- 8. Every effort will be made to use in-person or video-remote interpreters when interactions are expected to last longer than thirty (30) minutes or are scheduled in advance. The interactions include, but are not limited to:
 - a. Interviews;
 - b. Investigations;
 - c. Family Team Conferences (FTCs); and
 - d. Other meetings with LEP families.

⁵ When ACS staff are not present, provider agency is responsible for retaining interpreter services.

9. For cases handled by the Division of Child and Family Well-Being (CFWB), an LEP individual(s) *may* use family members, friends, or neighbors, to interpret if:
 - a. The LEP individual chooses to do so even after being informed of the availability of free interpretation services;
 - b. The person interpreting is at least 18 years old; AND
 - c. Reliance on the family member, friend, and/or neighbor to interpret is appropriate under the circumstances.

If the LEP individual(s) chooses to use a family member, friend, or neighbor to interpret instead of the free interpretation service, staff must ask for the relationship between the person interpreting and the LEP individual(s), and for the age of the person interpreting in order to verify they are at least 18 years old.⁶ Staff must then make a dated note in their case notes that the free interpretation services were offered and the LEP individual(s) declined the interpretation services. Staff must also note the relationship (family member, friend, neighbor) between the LEP individual(s) and the person who interpreted during that communication.

10. ACS and provider agency staff are prohibited from asking families to bring an interpreter with them.
- C. Foster Care provider agency staff must ensure that interpretation services are available during all interactions with an LEP child and/or family. Sign language interpretation for Deaf or Hard of hearing-impaired families receiving foster care services must be obtained as outlined in the ACS memorandum addressed to foster care agencies.
 - D. Working with an Interpreter
 1. ACS and provider agency staff shall use interpretation services for the entirety of all interactions, including application processing and responding to information requests.
 2. ACS does not provide an interpreter in court, as it is the court's responsibility to provide an interpreter. However, ACS is responsible for translating documents, including case notes, for known LEP individuals, utilized as evidence/exhibits in

⁶ Staff are not allowed to ask for any identification documents to obtain this information. If it is evident the person interpreting is over the age of older than 18, there is no need to inquire about their age, but if staff are uncertain about their age as to the age of the person, they must inquire.

hearings before the Office of Children and Family Services (OCFS), Bureau of Special Hearings.

3. When using interpretation services, ACS or provider agency staff shall:

- a. Speak in the first person directly to the LEP individual(s);
- b. Explain to the individual(s) that the interpreter's role is to interpret for ACS/provider agency staff and the LEP individual(s), and not to provide independent advice or answer questions;
- c. Choose words carefully. Avoid using slang, jargon, acronyms, or technical terms that may be difficult to interpret;
- d. Keep sentences as short as possible. Pause frequently to allow the interpreter to speak;
- e. Speak in a natural tone;
- f. Do not have private conversations with the interpreter or make remarks to the interpreter that the LEP individual(s) cannot understand;
- g. Stop the session if there are concerns that the interpreter is improperly interpreting, having private conversations with the LEP individual(s), or doing/saying anything inappropriate. If it is necessary to stop the interpretation session, staff may use a telephonic interpreter or reschedule the session with a different in-person interpreter, depending on which is most appropriate to the circumstances;
- h. Clearly indicate the end of the session to the interpreter; and
- i. Document both the start and end times of the session.

E. Provide Translation Services in Every Written Communication with the Family

1. LEP families are entitled to receive commonly distributed documents in their preferred language. If there is no translation already available, these documents can be translated from or to English by sending a translation request to Language.Access@acs.nyc.gov with the documents attached to the email request. A copy of all translated documents in the individuals or families preferred language must be retained in the individuals or families case file.

- a. If documents are not created by ACS but by another City or State agency, then the Language Access Coordinator shall verify the quality of the translation.
2. Commonly Distributed Documents shall be translated into each of the ten (10) Designated Citywide Languages and must be made available to all staff. If a letter/notice or other Commonly Distributed Documents are unavailable in the preferred language of the individual(s), ACS staff shall provide oral explanations of said documents using an interpreter to verify the LEP individual's understanding.⁷ For blind clients and families, all documents must be transcribed into Braille, if requested by the family. Visually impaired clients and families may require documents printed in larger font or other accommodations, which must be provided upon request.
3. ACS shall incorporate plain language principles for Commonly Distributed Documents by using plain language, wherever possible, in place of technical, legal, or specialized terms, and by using layout and design strategies to make such documents and communications easier to read, understand, and act upon.⁸
4. ACS does not translate legal documents (such as documents from legal processes, pleadings, and papers).
5. ACS must offer to translate, or transcribe, any ACS- produced document that a(n) LEP individual(s) must sign. These include, but are not limited to:
 - a. Child Safety Conference Summary;
 - b. Follow-Up Child Safety Conference Summary;
 - c. Family Team Meeting Summary;
 - d. Family Team Conference Summary; and
 - e. Family Assessment and Service Plan.

F. Document the Use of Language Assistance Services

1. As an agency, ACS is legally required to track the number of LEP individuals served, disaggregated by the type of language assistance required and primary language.⁹

⁷ See Local Law 30 of 2017.

⁸ Id.

⁹ See Local Law 73 of 2003. See Section VI below for more information.

2. ACS staff and provider agency staff must enter the individual's preferred language in the "Language" field in CNNX and must not select "unknown" or "multiple languages."
3. If the individual initially indicated that their preferred language was English, but later requested interpretation, staff shall review and update the "Language" field to indicate the preferred language of communication.
4. ACS and provider agency staff who do not use CNNX must enter all language needs in the record-keeping system used by their division/agency.
5. ACS and provider agency staff who do use CNNX must check that every individual served has the "Language" field filled out and completed correctly in their "Person Detail" screen correctly filled out; if the "Language" field is not filled out and completed, then ACS/provider agency staff member must document the empty field and a supervisor must be notified.
6. When starting to work with a new family or individual, staff should review the "Language" field and confirm with the family or individual that the information is correct.
7. If interpretation or translation services are used to communicate to the individual(s) in their preferred language, then ACS staff and provider agency staff must indicate that the person is not English language proficient by selecting "No" to the question "Is this person English Language Proficient?".
8. If the LEP individual(s) speaks one language, but reads and/or writes in another, staff shall indicate the latter language within the progress notes, and, if applicable, within the division's record-keeping system.
9. ACS staff and provider agency staff must note the ability or preference of the individual(s) regarding written communication, including potential illiteracy in the preferred language, within the division's record keeping system. If individuals are unable to navigate written communication, translation services must be provided.
10. ACS staff and provider agency staff shall document within the division's record-keeping system all progress notes of each interaction in which language access services were provided and what type of interpretation services were used (such as an in-person interpreter, video-remote interpreter, or telephonic interpreter). If possible, staff shall record the name or ID number of the interpreter used for the session.

11. Staff must make a dated note within their case notes for all cases in which a family opted to use its own interpreter.

G. Language Services Tools

1. ACS staff and provider agency staff shall use the tools described in this section to inform the LEP individual(s) of the availability of free language assistance services and identify the preferred language of the LEP individual(s).
2. Signage
 - a. ACS shall post signage developed by the Mayor's Office of Operations (MOO) and/or the Mayor's Office of Immigrant Affairs (MOIA), specifying the availability of free interpretation services, at each point of contact with members of the public, including all borough offices. Provider agencies are responsible for posting signage in their offices where they interact with families. Where possible, the signage should be poster-sized (approximately 24"x36"). The signage shall inform LEP individuals of the availability of free interpretation services.
3. Language Identification Card
 - a. A Child Protection Specialist (CPS) and provider agency staff must use the language identification card to identify the preferred language of the LEP individual(s), if necessary, and inform the individual(s) of the availability of free interpretation services.
 - b. If the language identification card does not contain the preferred language of the LEP individual(s), or if the LEP individual(s) is unable to read the card, CPS and provider agency staff shall use telephonic interpretation services to identify the preferred language, and then inform the LEP individual(s) of the availability of free interpretation services.

H. Use of Bilingual Staff for Interpreting

1. Division of Child Protection:
 - a. If a CPS has been hired through Selective Certification or otherwise certified for proficiency in that language in a method approved by ISLA, the CPS may speak to the LEP individual(s) directly in that shared language. CPS must make a dated note in CNX with the language spoken to the LEP individual(s) and the staff's

qualification when services were offered, and whether they were declined by the LEP individual(s).

- b. Otherwise, a CPS must request an interpreter and translation services for all communication with the child and family as soon as it becomes apparent that their preferred language is not English.
- 2. Non-DCP¹⁰ bilingual ACS and provider agency staff do not need to be certified as bilingual to speak to LEP families in a language other than English if such staff are known to be fluent in that language. However, ACS staff shall inform LEP families of the availability of third-party interpretation services, and such services must be used if families have any objections or concerns with ACS or with the provider agency staff providing interpretation services.
- 3. ACS, provider agencies, and their contractors shall make diligent efforts to recruit and hire qualified staff who reflect the linguistic makeup of the community served. When it is not feasible to hire bilingual staff from each different ethnic/cultural community group, the provider shall have "letters of linkage," memoranda of understanding, or other written agreements with community-based organizations, or have contractual arrangements with interpretation and translation services needed to serve LEP children and family members.

IV. Issues and Questions Regarding Language Access Services

- A. ACS staff and Prevention providers who have general questions on language access or issues with the language service vendors shall contact the Language Access Coordinator at: Language.Access@acs.nyc.gov.
- B. ACS and provider agency staff shall inform individuals/families that they may contact the ACS Language Access Coordinator with any language access complaint and shall provide the individuals/families with the contact information: Language.Access@acs.nyc.gov.
- C. ACS and provider agency staff shall inform individuals/families that they may contact the ACS Office of Equal Employment Opportunity with Sign Language Interpretation or reasonable accommodation complaints or request and shall provide the individuals/families with the contact information.

¹⁰ Division of Child Protection

For grievances or complaints related to Sign Language Interpretation or reasonable accommodations, contact:

ADA Coordinator, ACS Office of Equal Employment Opportunity
150 William Street, 11th Floor, New York, NY 10038.
Tel. (212) 341-8951 / Fax (212) 676-6515/
Email: EEO.ADACoordinator@acs.nyc.gov

Division-Specific Procedures for Requesting Language Access Services

- A. Some divisions and program areas within ACS may not have frontline staff and/or may not regularly interact with the public on a regular basis. Any such divisions or program areas shall contact the Language Access Coordinator for interpretation services or send an email request to Language.Access@acs.nyc.gov for written translation requests.
- B. For all other divisions and program areas with frontline staff and/or regular interaction with the public, see Appendices B-G and Desk Aids, detailing language access procedure for interpretation and translation services for each division.

V. Agency Tracking

- A. ACS is required to track the number of LEP individuals served, disaggregated by their preferred language. All public-facing ACS divisions and provider agencies must enter the LEP status and preferred language in CNNX records of each family they serve. If the division does not use CNNX, they must track this information in their system.¹¹
- B. At the end of each calendar year, ACS divisions must report to the Language Access Coordinator the numbers of LEP individuals served during that calendar year, disaggregated by preferred language.
- C. The Division of Administration shall track the number of certified bilingual ACS staff, disaggregated by language.¹² At the end of each calendar year, the Division of Administration must report to the Language Access Coordinator the number of bilingual ACS staff, disaggregated by language.
- D. The Language Access Contract Manager shall track the number of translation and interpretation requests, broken down by language, per year. At the end of each calendar year, the Language Access Contract Manager must report to the Language

¹¹ See Local Law 73 of 2003.

¹² Id.

Access Coordinator the numbers of LEP individuals served during that calendar year, disaggregated by preferred language.

- E. The Language Access Coordinator will include the data listed in points VI: A-D, above, in the Language Access Annual Report.¹³

¹³ See Local Law 30 of 2017.

► ACS Guide for ACS General Staff

Interpretation & Translation Services



Rights

- All ACS and provider agency clients have the right to receive services in their preferred language.¹
- All ACS and provider agency staff must provide equal access to services, regardless of a client's English language proficiency.
- Interpretation services for clients with limited English proficiency must be accurate, timely, and free for the client.



Interpretation Services (for oral or signed communication)

ACS offers interpretation services (which include in-person, video remote, and telephonic) for all ACS and prevention agency clients. *How do you know which method of interpretation to use? See below:*

 In Person and Video Remote	 Telephonic
<p>Provided by <i>Accurate Communication</i></p> <p>In-person interpretation is the best quality and should be used whenever possible.</p> <ul style="list-style-type: none"> ■ If an in-person interpreter is unavailable or inappropriate, you may also use Video Remote Interpretation (VRI) to request an interpreter to speak with the client. 	<p>Provided by <i>Language Line</i></p> <p>If in-person or video-remote interpretation is not possible, then telephonic interpretation must be provided.</p> <ul style="list-style-type: none"> ■ Telephonic interpretation may be used if the client shows up unexpectedly or staff were previously unaware that the client needed interpretation services. ■ Telephonic interpretation shouldn't be used for interactions expecting to last longer than 30 minutes.

Note!

Children should not be used to interpret for ACS and provider agency clients, as it presents a conflict of interest and could be harmful to the child.

☰ How to Request Translation Services (for written communication)

If you need a document translated, please have ACS staff email your request at language.access@acs.nyc.gov.

¹Title VI of the Civil Rights Act, Federal Executive Order 13166, NYC Executive Order 120, and Local Law 30.

Please see back side of this page for additional instructions ➡

► ACS Guide for ACS General Staff

Interpretation & Translation Services



How to Request Interpretation Services.



For In-person interpretation and Video Remote Interpretation (VRI) services:

1. For In-person interpretation & VRI: call (646) 459-0240 or email acsnycc@accuratecommunication.net
2. You will receive a **confirmation email** with the job reference number, job date, time, and the details of the request.
3. **Verify that the information in the email is correct. If not, immediately contact Accurate Communication ((646) 459-0240 or reply to the email).**
4. You will receive a **second email** with the interpreter's name with contact information.

For Video-Remote Interpretation (VRI) only:

5. You will receive a third email stating: "**Video session ready**". Click on the hyperlink where it says "**Click Here**" to start the video call at the start of your interpretation session.
IMPORTANT: If the link does not work or the screen freezes during the call please immediately contact Accurate Communication for support: (646) 459-0240).
6. **Completing the Video Call:** Once the call is completed, press the **hang-up** icon and fill in the survey at the end.

How Far in Advance Do I Have to Book a VRI or In-Person Interpreter?

- You need to book an interpreter a minimum of **2 hours** in advance for **Tier 1** Languages.
- You need to book an Interpreter a minimum of **24 hours** in advance for **Tier 2** Languages and **American Sign Language**.
- You need to book an Interpreter a minimum of **48 hours in advance** for **Tier 3** Languages.
→ *Note: Don't know what tier language you're asking for? Check out the "FAQ: Frequently Asked Questions" attachment.*



For Telephonic Interpretation Services:

1. Call the Language Line General Staff: ACS General Staff Hotline 1-866-874-3972
2. Enter your access code: **For ACS General Staff: 566222**

OR

Download the Language Line App to your phone (→ *Note: Don't know what the Language Line App is? Check out the "How to Download LLS App" attachment.*)

Language Access Feedback:

Please send all language access concerns, complaints, or questions to Language.Access@acs.nyc.gov

► Language Access FAQ: Frequently Asked Questions

- ***How far in advance do I have to book a video-remote or in-person interpreter?***

This depends on what language you're requesting. Find the language you're requesting below to know how far in advance you must place the request.

Language Tiers for VRI and In-Person Interpretation

1. You need to book an interpreter a minimum of **2 hours** in advance for **Tier 1** Languages:
 - **Tier 1 language are:** Spanish, Chinese (Cantonese and Mandarin), French Creole, Italian, Korean, and Russian
2. You need to book an Interpreter a minimum of **24 hours** in advance for **Tier 2** Languages and **American Sign Language**:
 - **Tier 2 languages are:** Afghani(Dari), Afrikaans, Albanian (Gheg & Tosk), Arabic (all Dialect), Armenian, Azerbaijani, Bengali, Bosnian, Bulgarian, Belorussian, Burmese, Catalan, Croatian, Czech, Danish, Dutch, Estonian, Ethiopian, Fijian, Filipino, Finnish, Flemish, French, Georgian, German, Greek, Haitian Creole, Hebrew, Hindi, Hindustani, Icelandic, Indonesian, Japanese, Khmer, Kurdish, Laotian, Latin, Latvian, Lithuanian, Macedonian, Malay, Malayalam, Mongolian, Myanmar, Navajo, Nepali, Norwegian, Pashto, Persian(Farsi), Polish, Portuguese, Punjabi, Romanian, Samoan, Sanskrit, Serbian, Shanghai (Chinese), Slovak, Slovene, Somali, Swahili, Swedish, Taiwanese, Tamil(Sri Lankan & Indian), Thai, Tibetan, Turkish, Ukrainian, Urdu, Uzbek, Vietnamese, Welsh, Yiddish
3. You need to book an Interpreter a minimum of **48 hours in advance** for **Tier 3** Languages:
 - **Tier 3 languages are:** Acholi, Akan, Amharic, Amoy, Asante, Assyrian, Bahasa, Bambananka, Bambara, Bassa, Berber, Cebuano, Chaldean, Chaozhou, Chiu-Chow, Chuj, Cutchi, Dari, Diejiu, Dinka, Dioula, Ewe, Fante, Formosan, Fuchien, Fukienese, Fulani, Fuzhou, Ga, Gaelic, Gypsy(Romany), Gujarati, Hakka, Hausa, Hmong, Ibo, Igbo, Ilocano, Ilongo, Joulaka, Kalenjin, Kannada, Karen, Kicongo, Kinyarwanda, K'Onjabol, Krio (Sierra Leon), Leta, Lingala, Luganda, Luhya, Malinke, Mandigo, Mandinka, Marathi, Marshallese, Mien, Mixteco Alto, Mixteco Bajo, Minangkabau, Moore, Nantong, Ning Po (Chinese), Nuer, Nugunu, Nzima, Oromo, Patois, Pidgin, Ponapean, Portuguese Creole (Cape Verdean Creole), Pulaar, Putien, Quechua, Quiche, Sarikoli, Sarikoli, Sinhalese, Soninke, Soso, Syriac, Tachew, Togalog, Tamashek (Tuarec), Tamazight, Telugu, Temne, Tigrinya, Twi, Ukwani, Uyzhur, Wenzhou (Chinese), Wolof/Ouoloff, Yoruba, Zulu and other languages not on this list.

Please see back side of this page for additional information ➡

► Language Access FAQ: Frequently Asked Questions

- ***How far in advance do I have to book a telephonic interpreter?***

Telephonic interpreters do not need to be booked in advance; they are available 24/7/365. Please see “How to Download LLS App” and “Translation & Interpretation” Desk Aids for more information.

- ***Are video-remote interpreters available after hours?***

Vendor office hours are Monday through Friday from 9am-6pm. VRI Interpreters are available during those hours. After hours, weekend and urgent requests for VRI services can be made and will be fulfilled, depending on the availability of the interpreter, by calling Accurate’s 24-hour line at 646-459-0240.

- ***Do I need a paper voucher for an interpretation session?***

No, paper vouchers are no longer used. In lieu of paper vouchers, ACS Language Access Contract Management is tracking electronic confirmations of VRI sessions and In-person sessions via their new email boxes. Confirmation of session booking, and session completion will be sent by the vendor to the relevant mailbox, with the requestor’s email cc-ed. **VRI and In-person requesters should be ready to respond to any follow up email from ACS Contract Management to confirm that session occurred and answer questions about how it went.**

- ***Can we use our own preferred video platform for VRI sessions?***

Video Remote platforms include but are not limited to: Interpreter Intelligence, WhatsApp, Skype, Microsoft Teams, and Zoom. If your preferred platform is not listed, reach out to the vendor to see if they can accommodate it (acsnycc@accuratecommunication.net).

- ***I am having a technical issue with my video-remote session, whom do I contact?***

Reach out to Accurate Communication at (646) 459-0240 or email acsnycc@accuratecommunication.net.

- ***I booked a session, but no longer need the interpreter. What do I do?***

Please cancel interpretation services **as soon as possible**. ACS pays cancelation fees if the session is canceled within 24 hours or less.

- ***I am having a technical issue with telephonic interpretation session, whom do I contact?***

Call Language Line Solutions 24/7 hotline **1-866-874-3972: ACS General Staff code 566222**.

- ***I am booking an ASL VRI interpretation session, anything I should know?***

Ensure that the **client can see the interpreter on the screen during the entire interpretation session** (hold your phone/tablet/ computer with screen **facing out**).

If the interpretation session will be longer than two hours, book **two ASL interpreters**.

If you have any complaints or questions about ASL interpretation, reach out to:

EEO.ADACoordinator@acs.nyc.gov and CC- our Language Mailbox at Language.Access@acs.nyc.gov

- ***I have a question not listed here, who should I contact?***

Please send Language Access concerns, complaints, or questions to Language.Access@acs.nyc.gov

► Guide for NYC Children Staff

ACS Telephonic Interpretation Services: by Language Line Solutions

Language Line now offers a phone app to help you reach a telephonic interpreter simply and quickly!

How to Activate Language Line Mobile Application

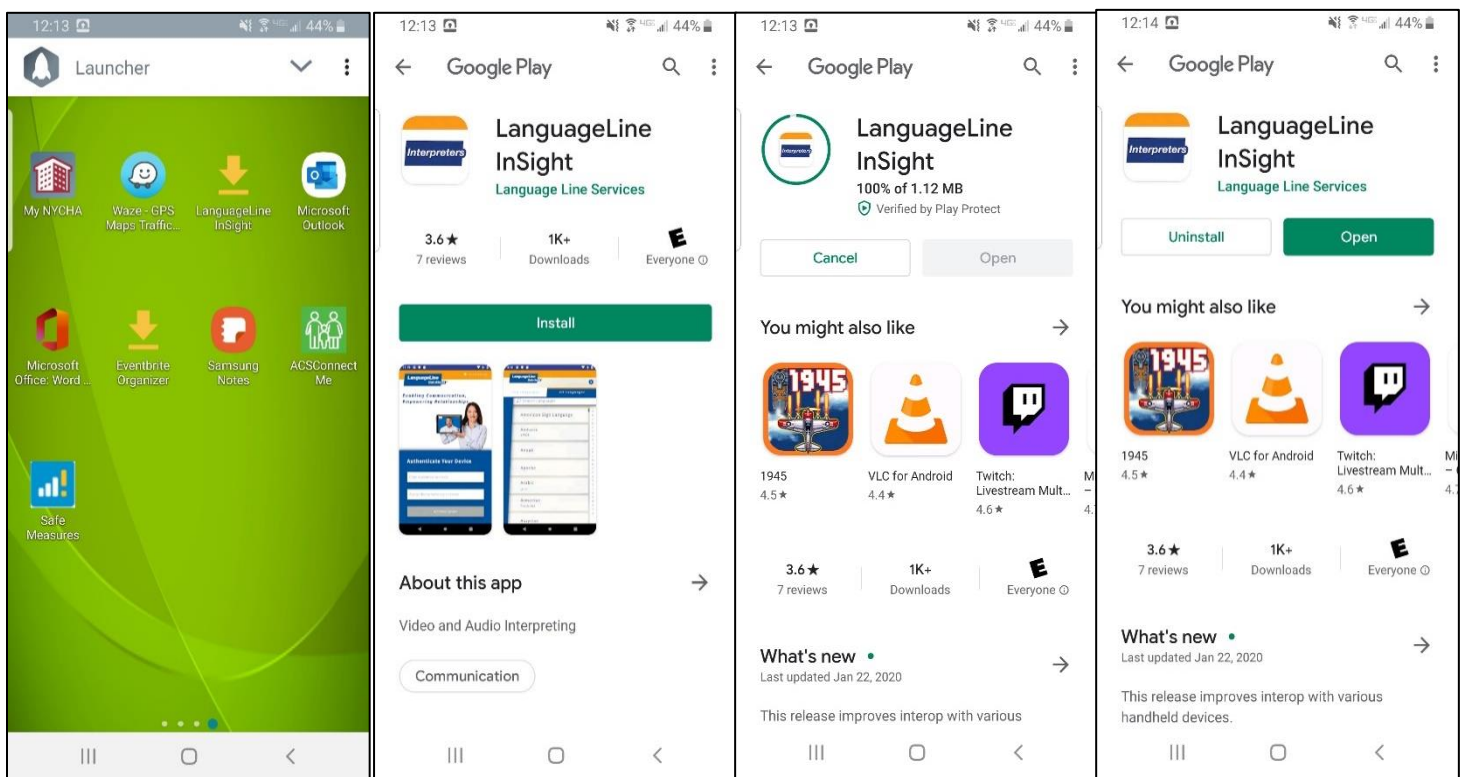
- **1:** Search for icon labeled **“Language Line Insight”** on your ACS mobile device.
- **2:** Tap on the **“yellow down arrow”**, you will then be redirected to the Google Play store to install app.
- **3:** Tap the **“Install”** button and then a small page will open stating **“Complete Set Up”**, press **“Continue”**.
- **4:** Another page will open asking you for a payment option, scroll down and select **“Skip”**.
- **5:** Wait for the app to download and then, tap **“Open”** to continue activating app.

1 & 2:

3:

4:

5:



Please see back side of this page for additional instructions ➡



Immigrant Services & Language Affairs

V May 2020

► Guide for NYC Children Staff

ACS Telephonic Interpretation Services: by Language Line Solutions

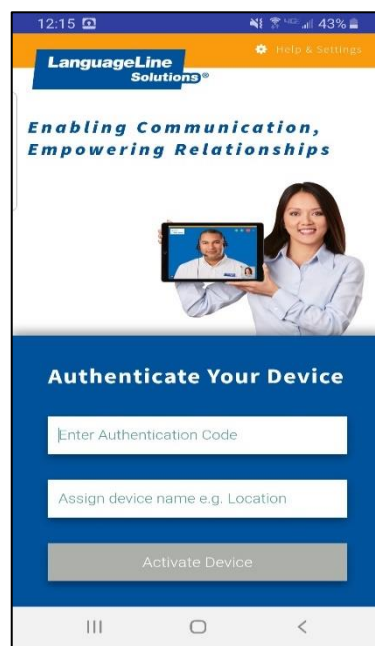
📞 How to Activate Language Line Mobile Application (continued)

- **5:** Tap **Language Line Insight** to begin configuring the app on your ACS mobile phone.
- **6:** Enter the **ONE TIME Authentication code** to register app to your ACS phone: **8MH6FD3W8Q**.
- **7:** Enter your **ACS Mobile Phone Number** in device name slot, to finish activating app to your ACS phone.
- **8:** **You only need to enter the Authentication code & ACS phone number once to register the app.**
- **9:** Now you can use the Telephonic Interpretation services on your mobile phone, 24/7/365!

5:



6 & 7:



8 & 9



****What if the app does not appear on my ACS mobile phone, what should I do? ****

- Re-start the phone a few times (few minutes apart) to re-fresh phone content and look for the yellow arrow link for app activation.
- Re-read the “How to Activate” instructions above to ensure nothing was missed.
- If the app installer link still does not appear, contact local tech for help

****Problems with the App: Call Language Line Solutions 24/7 hotline 1-844-373-1951 code 566222****



Immigrant Services & Language Affairs