

Department for the Aging Language Access Implementation Plan

This plan explains how the agency will provide services to individuals who have
Limited English Proficiency (LEP)

Agency Name: Department for the Aging

Language Access Coordinator: Sandy March

Language Access Coordinator Title: Senior Policy Analyst

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This plan includes information about:

1.	Agency Mission and Services	
2.	Agency Language Access Policy	
3.	Language Access Needs Assessment	How the agency assesses the language access needs of the people it serves
4.	Notice of the Right to Language Access Services	How the agency notifies the public about their right to language access services
5.	Provision of Language Services	What language access services the agency provides
6.	Resource Planning	How the agency ensures that it has the internal and external resources to provide language access services
7.	Training	How the agency trains staff to provide language access services
8.	Continuous Improvement Planning	How the agency ensures ongoing improvement of language access services
9.	Goals and Actions Planning	How the agency will implement the plan

Lorraine Cortes-Vazquez

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Lorraine Cortés-Vázquez, Commissioner
Commissioner, Department for the Aging

Date

Sandy March

Sandy March
Senior Policy Analyst, Department for the Aging

Date



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Section 1. Agency Mission and Services

The Department for the Aging's mission is to work to eliminate ageism and ensure the dignity and quality of life of New York City's diverse older adults, and for the support of their caregivers, through service, advocacy, and education.

To accomplish these goals, the Department for the Aging ("NYC Aging," "the Department," or "the Agency") supports a broad range of services and programs both directly and through approximately 400 direct service contracts, which aim to foster independence, safety, wellness, community participation and quality-of-life for older New Yorkers and their caregivers.

NYC Aging's core contracted programs include Older Adult Centers, Home Delivered Meals, Naturally Occurring Retirement Communities (NORCs), Home Care, Case Management, Caregiver Support Services, Elder Justice, Mental Health Initiatives, and Transportation.

Direct service programs include Foster Grandparent, Senior Employment, Silver Corps, Elderly Crime Victims Resource Center, and Tenancy and Eviction Support Services.

NYC Aging also operates Aging Connect, NY Connects, and the Health Insurance Information, Counseling, and Assistance Program (HIICAP). Aging Connect is an information and referral contact center for older adults and their families, which refers callers to resources, services, and opportunities in their community. Aging Connect also works in direct partnership with NY Connects, which serves individuals of all ages and income levels, seeking information about long term services and supports.

HIICAP helps older adults navigate the complexities of all components of Medicare. New York State certified HIICAP counselors provide assistance with Medicare Part D prescription plan selection, Medicare Savings Programs, and enrollment by appointment and via telephone, among other services.

The Department engages with members of the public through various forums, including outreach events, annual public hearings, as well as through social and electronic media, including the agency's website. These forums provide an opportunity for older persons, service providers and advocates to obtain important information and updates, and to share their views and recommendations on the agency's services.

For more information about NYC Aging's services, visit our website at: www.nyc.gov/aging.

Section 2. Language Access Policy

It is the policy of NYC Aging to ensure that older New Yorkers and their caregivers with Limited English Proficiency (LEP) have equal and meaningful access to its services. This

policy applies to all NYC Aging's direct services programs as well as to contracted providers.

Procurements are important vehicles that NYC Aging uses to promote equity for historically underserved populations, including individuals with LEP. Through solicitations, NYC Aging emphasizes the need for provider candidates to demonstrate how they will achieve cultural competence among staff related to the population groups in their geographic service areas, conduct outreach and marketing efforts to attract the full range of ethnic and cultural groups to their programs, and offer services that meet their needs.

NYC aims to facilitate aging services access and utilization by older individuals with LEP and advance equity and inclusion by:

- Informing individuals with LEP of their right to interpretation, free of charge;
- Conducting targeted outreach to individuals with LEP;
- Informing staff and providers about local, state, and federal language access mandates, including NYC Local Law 30;
- Ensuring staff, providers and the public are aware of and knowledgeable about the agency's Language Access Policy;
- Providing front line and outreach staff with training on the provision of language access services;
- Requiring contracted providers to have plans and policies in place to address the needs of individuals with LEP, as outlined in their contracts and program standards of operation;
- Monitoring contract agencies' compliance with language access requirements;
- Translating commonly distributed documents in the 10 designated citywide languages, as well as any supplemental languages spoken by targeted older New Yorkers with LEP; and
- Ensuring that the language access policy is in alignment with NYC Local Law 12 Disability Access Plan, where applicable. This includes ensuring that all translated documents adhere to the same accessibility guidelines as the English versions.

Section 3. Language Access Needs Assessment

New Yorker City's older adults are linguistically diverse, with about half speaking a language other than English at home, and of those, more than 30% are individuals with LEP. Language barriers can limit older adults' access to critical services and result in significant negative impact on various outcomes. NYC Aging conducts ongoing assessments and analyzes changes in demographic patterns to ensure that individuals with LEP have equal access to its services. In addition, the Department applies the Four Factor Analysis set forth in the Department of Justice's (DOJ) guidance to determine how individuals with LEP will be served.

Factor 1: The number and proportion of older individuals with Limited English Proficiency in New York City.

Top Ten Languages Spoken Among Older New Yorkers with LEP

(Source: American Community Survey (ACS) 2017-2021 Estimates PUMS Custom Data Tables, civilian non-group quartered population.)

Primary Language (60+)	# 60+	% 60+	# 60+ LEP	% 60+ LEP
Spanish	370,764	20.88	244,238	13.75
Chinese	131,821	7.42	118,869	6.69
Russian	69,109	3.89	59,138	3.33
Italian	31,787	1.79	15,911	0.90
Haitian	26,659	1.50	14,771	0.83
Korean	17,656	0.99	16,200	0.91
French	16,040	0.90	4,791	0.27
Greek	14,231	0.80	7,803	0.44
Bengali	17,770	1.00	13,035	0.73
Polish	14,193	0.80	11,174	0.63
Total Population (60+)	1,775,783	100.00	580,064	32.67

LEP (Limited English Proficiency): Speaks English less than "very well."

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

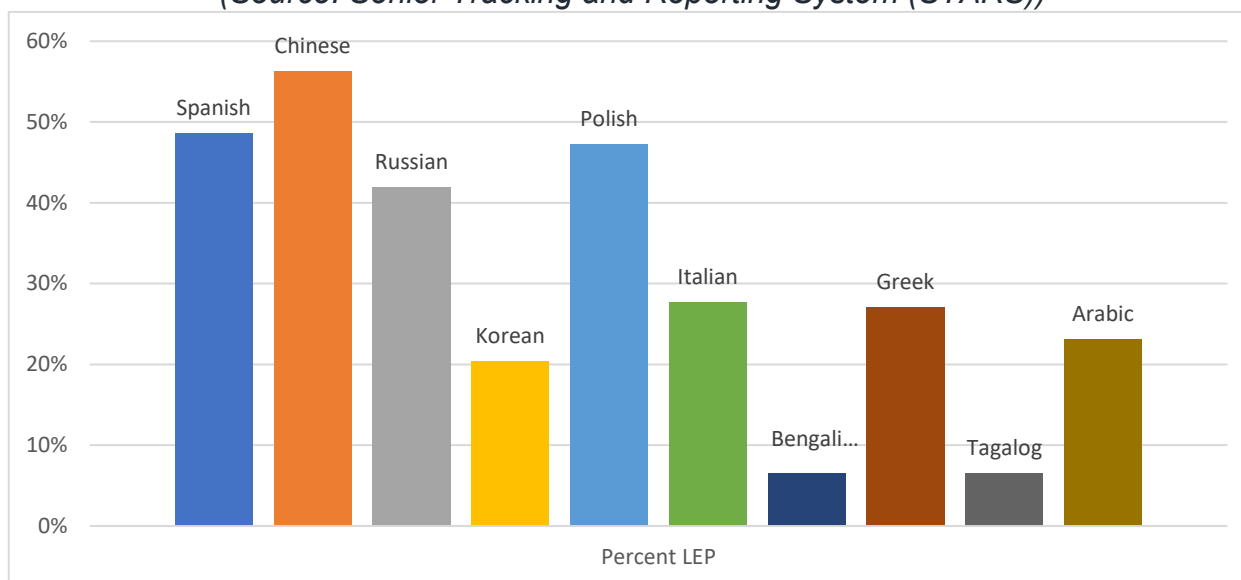
During Fiscal Year 2023, NYC Aging served over 213,000 older New Yorkers and their caregivers. Among those:

- 40% speak a primary language other than English; and of these,
- 44% cannot speak, read, or understand English (LEP).

The chart below shows the percentage of clients with LEP by top ten most spoken non-English languages. Analysis of the data suggests that Tagalog is emerging as one of the top languages spoken by NYC Aging clients with LEP, even though it is not among the top ten languages based on census data and is not one of the 10 designated city languages. The Department will monitor this data to see if there is indeed a developing trend and will ensure that this language needs is met.

Percentage of NYC Aging Clients with LEP and Top Ten Languages Spoken Fiscal Year 2023

(Source: Senior Tracking and Reporting System (STARS))



The table below shows the number of, and frequency with which, individuals with LEP came into contact with NYC Aging's core programs during Fiscal Year 2023. The data indicates that individuals with LEP utilized NYC Aging's services slightly more frequently than clients who are proficient in English.

Frequency of Contact	Clients Proficient in English	Clients with LEP	Total
Fewer than 10 times	46%	42%	45%
10 or more times	54%	58%	55%

Source: Senior Tracking and Reporting System (STARS)

Factor 3: The importance of the benefit, service, information, or encounter to the limited English proficient person.

The services NYC Aging provides help older adults remain safe and secure, and age well in their communities. The lack of, or delay in access to, translation or interpretation services can have serious implications for older adults with LEP and their caregivers trying to access these services. This was evident during the COVID-19 pandemic where prompt, accurate information provided to older adults in the language they speak was crucial to helping them remain safe and aware of available services, as well as any service changes.

Factor 4: Resources available to the agency and the costs of providing the various language services.

NYC Aging’s main resources for language services are Language Line Solutions, which provides interpretation services in over 240 languages, LM Translation Services, and NYC Aging’s multi-lingual staff who can competently assist individuals with LEP in various languages other than English. In Fiscal Year 2023, NYC Aging spent a total of \$47,514 on translation and interpretation services.

Section 4. Notice of Right to Language Access Services

Multi-lingual signage informing visitors about the right to free interpretation are posted in conspicuous locations in NYC Aging’s office where walk-ins are received, as well as at contracted providers’ service locations. Agency staff also utilize language identification tools provided by the Mayor’s Office of Immigrant Affairs (MOIA), including “I speak” and “Point to your Language” cards, to facilitate communication with individuals with LEP. All staff that interact with the public are trained to ensure that non-English speakers are aware of the availability of free language access services. At outreach events, NYC Aging will inform individuals with Limited English Proficiency of their right to free language access services.

Contracted providers are required to include information about the availability of free language assistance for persons with limited English proficiency in their public information and outreach materials.

Section 5. Provision of Language Access Services

The Department’s services are provided with respect for cultural differences, preferences, and styles of communication, and with skill in assisting individuals in overcoming linguistic barriers. NYC Aging’s referral program staff and contracted providers are knowledgeable of linguistically and culturally competent service providers in their community and the city and are able to refer individuals with LEP to those providers when needed.

Interpretation

- NYC Aging has a multi-year contract to provide on-demand telephonic interpretation. Through this contract, telephonic interpretation is available in over 250 languages.
- Bilingual staff provide interpretation at outreach and public events.
- Staff are trained in the appropriate and timely use of telephonic interpretation services.
- Contractors are required to have, at minimum, a telephone interpretation service contract or similar community arrangement with a language interpretation services provider, as well as to provide notice of the availability of free interpretation.

Translation

- NYC Aging has a multi-year contract for translation services.
- Commonly distributed documents and those that contain important and necessary information are translated into the 10 designated citywide languages, or in the languages of individuals with LEP eligible or likely to be served or affected by the agency's programs or activities based on analysis of internal and external data. These include consent and complaint forms, notices of rights, and notices of service changes.
- Documents targeted for translation are written in plain language to ensure that the information can easily be understood by individuals with a range of literacy levels once translated.
- Proficient multi-lingual staff conduct secondary review of professionally translated materials to ensure that information is accurately conveyed to individuals with LEP.

Digital Communication

- Multi-media outreach and public service campaigns are conducted in community and ethnic media in the predominant languages of the neighborhood population.

Emergency Communications

- Language Line is used to facilitate communication with clients with LEP regarding emergencies. Clients with LEP are identified by their language designation in the agency's client tracking system.
- Multi-lingual staff are recruited to table at disaster service assistance centers.
- Agency brochures translated in the 10 designated languages are distributed at disaster service assistance centers. The brochures provide information about the NYC Aging's services that older adults can access during an emergency.

Section 6. Resource Planning

The agency has strengthened its internal capacity for providing language access services by procuring telephonic interpretation and translation contracts in Fiscal Year 2023, and by leveraging the language skills of staff. Through trainings, staff are made aware of the agency's language access services, and how and where to access such resources.

The Department also requires contracted providers to have plans in place to assist individuals with LEP. This requirement is outlined in Requests for Proposals and in contracts with service providers.

A. Bi-/multi-lingual staffing

Several certified bilingual NYC Aging staff have volunteered for the agency's Subject Matter Expert (SME) program. These staff assist with short translations as well as with interpretation, where appropriate.

Program standards outline the requirement for programs to make every effort to employ staff and/volunteers who speak the languages of the predominant groups of their clients to help bridge the language gap.

B. Language service vendor contracts

In Fiscal Year 2023, the agency contracted with LM Language Services for translation and with Language Line Solutions for telephonic interpretation services. Each contract is for a period of three years, with a contract amount of \$99,000 each.

Over 3,000 over the phone interpretations in more than 40 languages were provided through Language Line Solutions during Fiscal Year 2023. The expenditure was for this service was \$31,096.

Also, in Fiscal Year 2023, several commonly distributed documents were translated in the 10 designated citywide languages. Among these were client consent forms which, were also translated in Japanese to accommodate a growing number of Japanese speaking clients. The total expenditure for translation services in Fiscal Year 2023 was \$16,417.

The agency's Language Access Coordinator manages these contracts and will continue to track and monitor these resources to ensure that the Department is effectively and efficiently utilizing them.

Vendor name	Procurement method	Purpose of the contract	Language(s) provided by the vendor (List languages or number of languages provided through this contract)	Period of contract	Total award amount of contract
LM Language Services	MWBE Non Competitive Small Purchase	Document translation services	178 languages, including the 10 LL30 languages	July 17, 2023, through December 31, 2025	\$99,000.00
Language Line Associate	MWBE Non Competitive Small Purchase	Telephonic interpretation	175 languages, including the 10 LL30 languages.	January 1, 2023, through December 31, 2025	\$99,000.00

C. Partnership with Community Based Organizations (CBOs)

NYC Aging does not have any language services contracts with community-based organizations. However, the agency collaborates with community partners, including local congregations,

nonprofits, libraries, and community boards to disseminate agency information, including brochures, which are translated into the 10 citywide languages. The Department will continue to build on these relationships.

Section 7. Training

NYC Aging's Training and Professional Development Unit, with support from the Language Access Coordinator, will continue to conduct trainings for frontline staff and managers on language access laws, as well as on agency policies and procedures. Trainings are conducted in-person approximately twice per year to accommodate new staff, as well as any current staff who need a refresher.

Training topics include:

- Language access legal mandates.
- Procedures for accessing access telephonic and interpretation services.
- When it is appropriate to use bilingual staff and when to use language services providers.
- How to handle urgent situations when language assistance is needed.
- How to identify the primary language of a person with LEP.
- How to document language access requests.
- How to provide good customer service to individuals with individuals with LEP.

Section 8. Continuous Improvement Planning

NYC Aging conducts continuous improvement planning for language access services in order to consistently provide high-quality and appropriate language access services to individuals with LEP.

A. Data Collection and Monitoring

NYC Aging has implemented a robust data collection and monitoring process, which has resulted in more accurate and complete data on its clients with LEP and the City's population. In the agency's client database, which is utilized by internal programs and contracted providers, the data field for entering clients' primary language was modified, changing the default from English, to making it a mandatory input field selection.

This has resulted in more accurately capturing the languages clients speak in order for information to be provided to them in their preferred language or interpretation offered, if needed. Additional forms have been included in the database to capture more language information, including level of English proficiency, consistent with questions on the American Community Survey (ACS).

Language selection fields have also been added to the Client Tracking System (CTS), which is an internal database utilized by Aging Connect and the Department's Correspondence Unit.

The agency's data team regularly monitors language data, conducts data cleaning, and recommends ways to improve the quality of the data.

The Department will be transitioning to a new client database in Fiscal Year 2025, and one of the main goals is to improve data quality and accuracy. The Department will continue to examine data from all its systems, as well as analyze demographic trends to help identify, target, and more effectively and equitably serve clients with LEP.

B. Language Access Complaints

Aging Connect Specialists and the Correspondence Manager receive, track, and facilitate resolution of complaints received by the agency, including language access complaints. Multi-lingual signage with information about how to submit a language access complaint is visibly posted at the agency's walk-in office.

All Aging Connect and the Correspondence Unit staff are trained on how to communicate with individuals with LEP in a linguistically and culturally appropriate manner, and to respond to complaints in a timely manner. The Department did not receive any language access complaints in Fiscal Year 2023.

If any complaints about language accessibility or requests for language access services are received, they are forwarded to the Language Access Coordinator who will assist with a resolution, if necessary.

The Language Access Coordinator also has access to the correspondence database reporting tools and can run reports. Reports on any language access complaints received will be included in the Language Access Annual Report required by the Mayor's Office of Immigrant Affairs. The agency tracks response times for correspondence to ensure adherence the City's service level requirement, and for internal quality assurance purposes.

Members of the public can submit language access complaints, questions, and requests to the agency by contacting 311 by phone or online or through NYC Aging's website at: <https://www1.nyc.gov/site/dfta/about/email-the-commissioner.page>.

Section 9. Goals and Action Planning

The Language Access Coordinator (LAC) will oversee implementation of the Language Access Plan in collaboration with stakeholders, including staff from Program, Legal, Human Resources, Training and Professional Development, and External Affairs. The LAC will also regularly assess the effectiveness of the agency's language access efforts, monitor the Plan for compliance with NYC Local Law 30, apprise the leadership of any non-compliance, and make recommendations

for strengthening the agency's language access service delivery. NYC Aging's goals for the next three years are outlined in the chart below.

Priority Language Access Need	Root Cause(s)	Language Access Goal	Action Steps/ Milestones	Stakeholders (Internal and External)	Timeline
Accurate translations for all materials.	Professionally translated materials might not accurately convey information in source document.	Obtain resources to conduct secondary review of all translated materials.	<ul style="list-style-type: none"> Recruit additional qualified multi-lingual staff. Identify resources among community partners. Advocate for funding to pay for secondary review. 	External Affairs, LAC, Fiscal, Executive Staff.	Fiscal Year 2025, Quarter 4
Consistency in the words and phrases used across all translated documents.	There are sometimes inconsistencies in the translations of certain words or phrases.	Develop a glossary of commonly used words and phrases in materials that NYC Aging produces for translation.	Work with vendor and NYC Aging's qualified multi-lingual staff to develop a glossary.	NYC Aging multilingual staff, LAC, translation vendor.	In progress and ongoing.
Trained or certified multi-lingual staff for interpretation and translation review.	Some staff have proficiency in languages other than English, but do not have training or certification for translation and interpretation.	Multi-lingual volunteers are trained to assist with interpretation and review of translation.	<ul style="list-style-type: none"> Research training options. Research funding options. 	Human Resources; Fiscal.	Fiscal Year 2026, Quarter 3
Language access training for providers.	Language Access is required for providers, but they are not trained on how.	Provide standardized training to contracted providers.	Develop training materials and schedule training.	Training and Professional Development; LAC; Program Directors.	First training to be held by Fiscal Year 2025, Quarter 4

Make digital communication accessible in additional languages.	Lack of resources to translate selected digital communication in the 10 designated citywide languages.	Obtain resources to translate selected digital communication in the 10 designated citywide languages.	Research funding or other resources.	External Affairs	Fiscal Year 2026, Quarter 4
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