



Language Access Implementation Plan

The Language Access Implementation Plan explains how the agency will provide services to people who have limited English proficiency (or LEP).

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|------------------------------------|--|
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Signatures



6/6/24

Cheryl Wertz
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Date



6/6/24

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Date



Section 1. Agency mission and services

This report covers the Department of Social Services (DSS), the Human Resources Administration (HRA) and the Department of Homeless Services (DHS). Data included in this report references calendar year 2023.

DSS/HRA/DHS is committed to serving New Yorkers in need, regardless of their language of preference. Since 2022, the Agency has been profoundly impacted by the substantial increase in asylum-seekers arriving in New York City. Many of these newest New Yorkers, who hail from all over the world, seek shelter and social services. Most prefer to communicate in a language other than English. To meet this rapid increase in need, the Agency has changed some of the ways in which we provide language services. For instance, DSS/HRA/DHS has been providing, for the first time, standing in-person interpretation services at DHS intake sites, some shelter locations and select social services offices since 2022. We are increasing our languages of translation and are in the process of making our online platforms more accessible to more individuals. The Agency will continue to meet its obligation to allow all New Yorkers, including the newest arrivals and those who prefer to communicate in a language other than English, access the important benefits and services that DSS, HRA and DHS provide.

Department of Social Services (DSS)

In 2017, the administrative units of the New York City Human Resources Administration (HRA) and the New York City Department of Homeless Services (DHS) integrated to create a shared services model that provides more effective, seamless client services under the Department of Social Services (DSS). By working together under shared leadership and a unifying structure, we are doing more effective work for more New Yorkers in need. This includes sharing resources for providing free and confidential language services, managed by the DSS Office of Refugee and Immigrant Affairs (ORIA).

While the majority of DSS staff are administrative, the Agency has four client-facing¹ units:

- The Office of Constituent Services includes the Agency's call center (known as the One Number)² and the Ombudsman's Office, a hub for managing DHS shelter inquiries and complaints.
- The Office of Civil Justice is a free legal referral program. Program client interactions are primarily with provider, not Agency staff.³
- The Accountability Office includes the Investigation, Revenue and Enforcement Administration and the Audit and Quality Assurance Services teams. These teams meet with clients in offices and over the phone.⁴

¹ Throughout this document, the word "client" is used to refer to clients, applicants, consumers, or members of the public.

² All Agency IVR systems, including the One Number, the Cash Assistance and SNAP interview lines are available in Arabic, Bengali, Cantonese, English, French, Haitian Creole, Korean, Mandarin, Polish, Russian, Spanish and Urdu. Menu support is available in Albanian, Italian and Yiddish. Once clients reach a staff member, interpretation services are available in 250+ languages.

³ Many partner organizations rely heavily on bilingual staff, but all partner organizations and providers are also required to have telephonic interpretation and sign language interpretation services available.

⁴ Every Agency staff member has access to telephonic interpretation services in 250+ languages, 24 hours a day, 7 days a week, 365 days a year. In addition, any staff member can request an in-person interpreter for a client who needs this support for any reason.

- The Community Outreach team meets clients in the community, attending public and partner-led events to answer questions and provide enrollment support.

Human Resources Administration (HRA)

Serving more than 3 million New Yorkers annually, the New York City Human Resources Administration (HRA) provides economic support and social services to families and individuals through the administration of fifteen benefit programs including Cash Assistance, Supplemental Nutritional Assistance Program benefits (SNAP – formerly referred to as food stamps), Medicaid, and Child Support Services. HRA also provides homelessness prevention, educational, vocational and employment services. For the most vulnerable, it provides HIV/AIDS Services (HASA), Adult Protective Services (APS), Home Care and programs for survivors of domestic violence.

A significant portion of HRA’s client interactions occur through Access HRA, an online application and case processing portal and integrated mobile app.⁵ The portal and app allow users to manage their benefits, such as Cash Assistance, heating and cooling assistance, Fair Fares and SNAP program applications and recertifications. Most Cash Assistance and SNAP clients then complete a mandated interview by calling a designated phone line. Clients who need extra support or who cannot apply online for any reason, are welcome to apply for services in-person at one of 17 walk-in Cash Assistance locations or 11 SNAP locations.⁶

Clients interact with HASA, the Office of Child Support Services, Medicaid, Career Services, Customized Assistance Services and our rental assistance programs through a combination of walk-in appointments and phone calls. Some client interactions for these programs are handled by Cash Assistance and SNAP staff, saving clients the need to make another trip or call another program.

Due to the nature of their work, most Adult Protective Services and Home Care Services Program client interactions are in the form of home visits.⁷

The IDNYC program uses an online scheduling site⁸ to arrange an in-person appointment at one of 10 physical locations.

HRA’s rental assistance programs are accessed primarily through in-person or telephone interactions with staff members at Department of Homeless Services locations or Benefits Access Centers. Clients can also apply for rental assistance or ask for help at one of the 26 Homebase partner sites run by community-based organizations across the city. Renewals for CityFHEPS, the largest rental assistance program, can be done on Access HRA.

HRA’s domestic violence services are primarily contracted to community-based organizations. Client interactions are usually with provider staff.

⁵ Access HRA is professionally translated into Arabic, Traditional Chinese, Haitian Creole, Korean, Russian, and Spanish. Additional languages will be added in 2024. For more details, please see section 5C.

⁶ Bilingual staff support and/or telephonic interpretation is available at every Agency walk-in location. Some locations also have full-time in-person interpretation services available. For details, see section 5A.

⁷ Along with bilingual staff, these programs utilize a combination of telephonic interpretation services and in-person interpretation services.

⁸ The IDNYC scheduling site is available in Arabic, Bengali, Traditional and Simplified Chinese, English, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu.

Department of Homeless Services (DHS)

The New York City Department of Homeless Services (DHS) is the largest organization in the United States committed to preventing and addressing homelessness. Together with our not-for-profit partners, the mission of DHS is to prevent homelessness, when possible, address street homelessness, provide safe temporary shelter, and connect New Yorkers experiencing homelessness to suitable housing. DHS does this with accountability, empathy, and equity. As it engages in this mission, DHS employs a variety of innovative strategies to help families and individuals successfully exit shelter and return to self-sufficiency as quickly as possible.

The Department of Homeless Services includes separate programs for different communities: Families with Children, Adult Families, Single Adults and Street Homeless Solutions.

Individuals and families must apply for temporary shelter services in NYC at one of 5 walk-in intake locations. If a client or a family is deemed eligible for placement, they will be transitioned to one of more than 400 direct-run or contracted shelter locations. While most interactions within shelter happen in-person, staff will also make use of the phone to communicate with clients.

Section 2. Agency language access policy

In our city of immigrants, DSS/HRA/DHS is committed to providing equal access for all New Yorkers. Thirty percent of HRA's clients and thirty-nine percent of DHS's clients prefer to communicate in a language other than English. Collectively, our clients speak more than 100 languages.

The overall goal of DSS/HRA/DHS's Language Access policies are to ensure that all the benefits and services that the Agency provides are equally accessible to all New York City residents, regardless of their language skill or preference.

The Agency's language access procedures and policies reflect our core principles:

All Agency employees and contracted providers are required to work with clients in the language of the client's preference. This is primarily accomplished using bilingual staff and professional, contracted interpretation services.

DSS has an overarching policy on the provision of written translation services that covers all programs in DSS, HRA and DHS. According to the policy, all Agency-developed documents that are distributed to the public or shared with clients are to be available in 12 languages (Arabic, Bengali, Simplified and Traditional Chinese, English, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu).⁹

To simplify the message to staff and accommodate the needs of HRA's and DHS's diverse program areas, each program has a policy on the use of interpretation services. In general, programs that offer benefits and services allow clients to provide their own interpretation services, if the suggested interpreter is over 18 years of age. Programs that conduct investigations generally do not allow clients to provide their own interpreters.

All program areas have policies on interpretation services that include the following core elements:

- No program/employee can discriminate, restrict, or deny services or benefits based on a client's language or lack of English language proficiency.
- All employees are required to work with clients in the clients' preferred language.
- All clients must be offered immediate, free, and confidential language services.
- Language services can be provided by bilingual staff or by using professional interpretation services, including telephonic interpretation services.
- Individuals under the age of 18 are not allowed to provide interpretation services.
- All clients have the right to confidential services. Staff may not ask other clients or members of the public to provide interpretation services.
- Staff can access telephonic interpretation services, in-person interpretation services and sign language interpretation services 24 hours a day/7 days a week.
- Staff may contact the Office of Refugee and Immigrant Affairs (ORIA) for additional support and guidance on any language access related issues.

DSS/HRA/DHS also have overarching policies regarding reasonable accommodations and specific supports for individuals who need sign language interpretation and/or notices in alternative formats.

⁹ For additional information on the Agency's commitment to providing translations in additional languages, please see sections 5b and 9.

Both the Agency’s language access and sign language policies require that staff offer sign language interpretation services to clients who are deaf or hard-of-hearing. Any individual who requests sign language interpretation, for any reason, are to be offered immediate (within 15 minutes) video interpretation services or the option to schedule an in-person interpreter at a later date. Every Agency walk-in location, including those run by contracted providers, must have a working computer with a web cam available for video sign language appointments.

For clients who are blind or low-vision, Agency staff are required to read documents aloud. The Agency provides some documents in large print and other alternative formats, including audio format, screen readable documents and Braille. A set group of client-specific documents are regularly mailed to clients in Braille. In 2024 and 2025, the Agency hopes to utilize a New York State contract with a disability-services provider to improve the number and quality of forms, notices and documents that are available in alternative formats.¹⁰

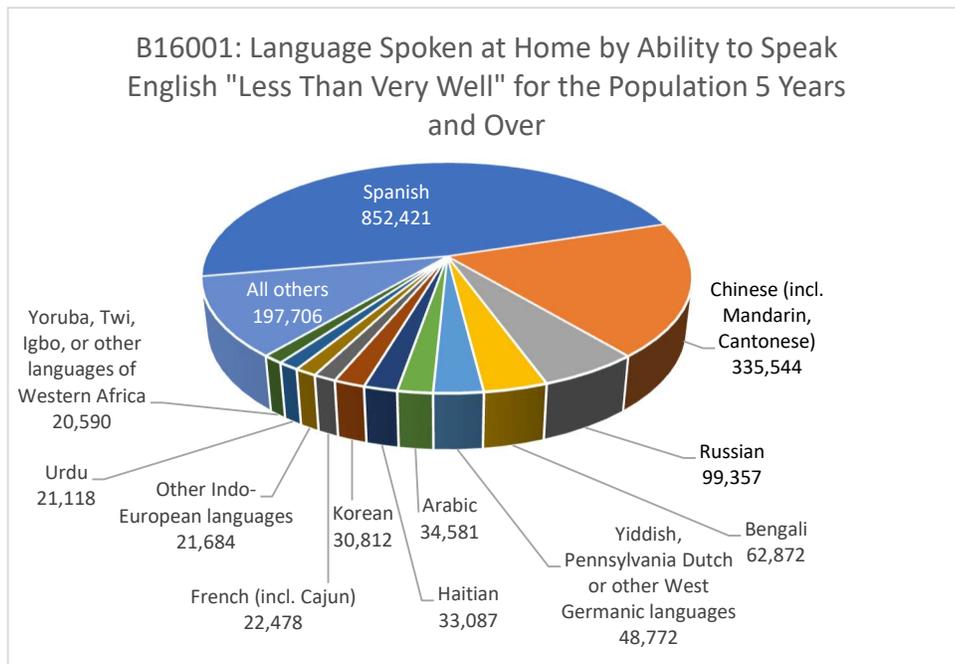
¹⁰ See Section 9 for details.

Section 3. Language access needs assessment

Factor 1 examines the number or proportion of LEP persons eligible to be served or likely to be encountered by the program.

DSS/HRA/DHS’s service area includes all of New York City.

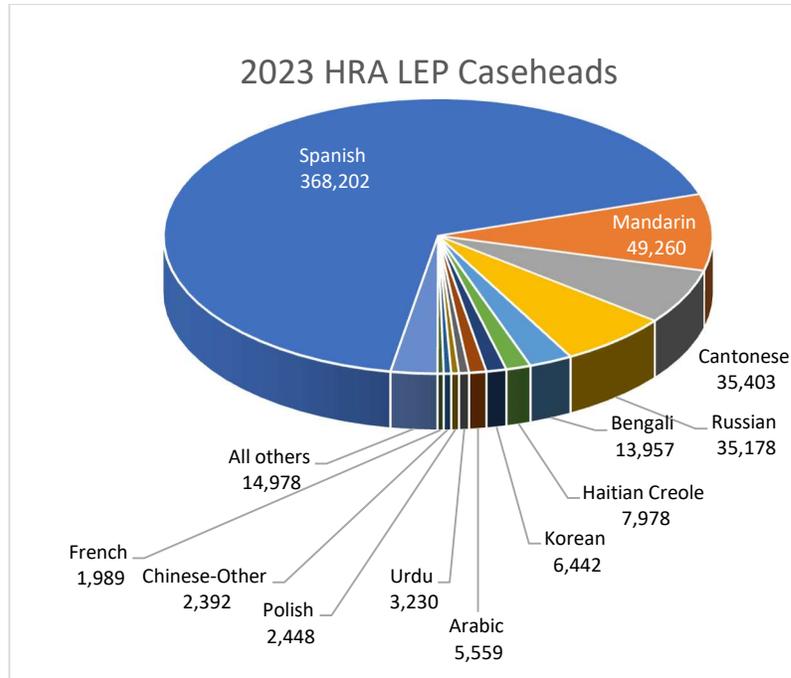
According to the U.S. Census Bureau¹¹, New York City residents who speak English less than “very well” are likely to speak: Spanish, Chinese, Russian, Bengali, Yiddish, Arabic, Haitian Creole, Korean, or French.



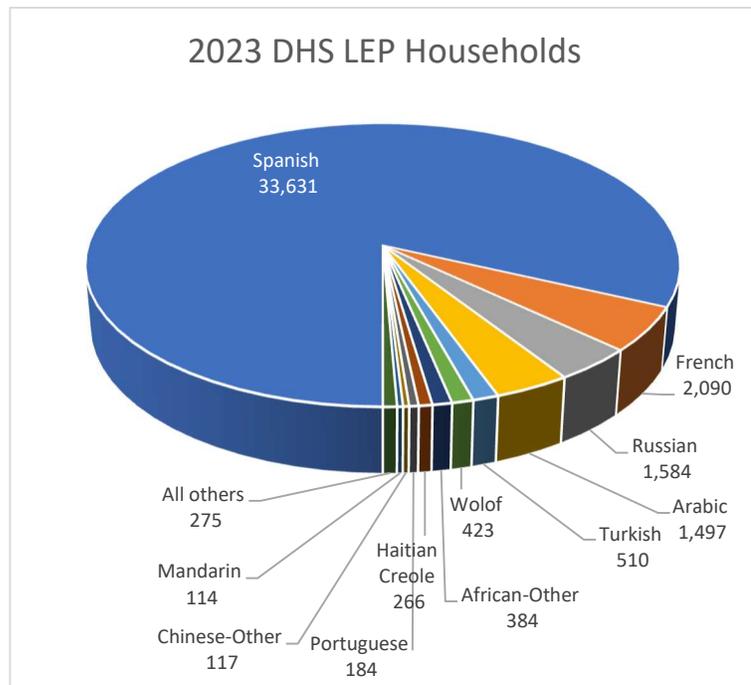
Factor 2 is an analysis of the frequency with which LEP individuals come in contact with the program.

In 2023, HRA served 1.8 million unique cases. One-third (30%) of HRA’s client population is limited English proficient. The top nine non-English languages spoken by HRA clients are: Spanish, Chinese, including Mandarin, Cantonese and other dialects, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu and Polish.

¹¹ U.S. Census Bureau, 2022 American Community Survey 1-Year Estimates



In the same year, DHS served a total of 105,629 households. Of those, thirty-nine percent, or 41,075 individuals/families who lived in shelter in 2023, prefer to communicate in a language other than English. Collectively, DHS residents speak 47 languages. The top ten languages spoken by DHS residents, other than English are Spanish, French, Russian, Arabic, Turkish, Wolof, Haitian Creole, Portuguese, Chinese and Fulani.



DSS/HRA/DHS primarily meets the language needs of clients using bilingual staff, telephonic interpretation (available in more than 250 languages), in-person interpretation and video interpretation for spoken languages and sign language. With these tools, staff is expected to communicate with every client in their preferred language.

The Agency also provides written documents in all ten of the city-wide languages mandated by Local Law 30 (Arabic, Bengali, Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu). Together, these languages represent 99% of the Agency’s client population who prefer to communicate in a language other than English.

Factor 3 requires an explanation of the nature and importance of the program, activity, or services provided by the program to people’s lives.

DSS/HRA/DHS provides a variety of social services and economic assistance to eligible individuals and families. The goal of these services is to enable these New Yorkers to lead independent lives. When an applicant/client calls or visits any Agency office, language must not be a barrier to the services. This plan reflects the Agency’s commitment to providing language access services and meeting the following over-arching goals:

- To ensure that language is not a barrier to Agency services;
- To ensure that all applicants, clients, and shelter seekers/residents have equal access to the services for which they are eligible, regardless of the level of their English proficiency;
- To inform all applicants, clients, and shelter seekers/residents that free interpretation services are always available; and
- To train front-line staff on the importance of ensuring access to free interpretation services for all clients.

Factor 4 requires a description of the resources available to the Agency and costs.

DSS/HRA/DHS use bilingual staff, telephonic interpretation and, when appropriate, video or in-person interpretation to communicate with clients in their preferred language.

DSS/HRA/DHS utilizes outside vendors to provide written translation, on-site interpretation, telephonic interpretation, sign language interpretation and bilingual skills testing.

| Type of Service | Vendor | 2023 Instances | 2023 Expenditures |
|--|-------------------------------|----------------|-------------------|
| Telephonic Interpretation | Language Line Solutions, Inc. | 743,822 | \$ 6,187,747 |
| Written Translation | Language Line Solutions, Inc. | 1,139 | \$ 892,275 |
| Sign Language Interpretation (video & in-person) | Accurate Communication, Inc. | 1,069 | \$ 145,473 |
| In-Person Interpretation Appointments | Geneva Worldwide, Inc. | 1,560 | \$ 1,202,659 |

| | | | |
|--|------------------------------|------------------------------|---------------------|
| In-Person Interpretation Shifts | | 3,138 | |
| Secondary In-Person Appointments | Accurate Communication, Inc. | 90 | \$ 13,143 |
| In-Person Interpretation Shifts for Asylum-Seekers | Accurate Communication, Inc. | 30,095 | \$ 9,672,450 |
| Quality Assurance for Written Translations | CQ Fluency Inc | 5 | \$ 4,895 |
| Alternative Format Documents | Vanguard | 8 large print 164 Braille | \$ 20,504 |
| CART Services | Accurate Communication, Inc. | 7 | \$ 2,250 |
| Total Costs | | | \$18,141,396 |

Section 4. Notice of the right to language access services

DSS/HRA/DHS explicitly informs the public of the availability of free language services through:

- posters in all walk-in locations
- notices on tickets in walk-in HRA centers
- notices of free language services in application and renewal packets
- Agency outreach presentations and events

A poster-sized notice informing clients of their right to free language services is hanging prominently in all DSS/HRA/DHS locations. The poster reads, in 20 languages, “You have the right to free interpreter services at this location. If you need an interpreter, please go to the reception desk and we will call someone to interpret for you. If you have a question, comment or complaint about translation or interpretation at this location, please speak to a worker or call 311. Filing a complaint will not affect your case.” The poster also includes the symbol for sign language interpretation. The Office of Communications and Marketing staff are responsible for regularly confirming that each location has this mandated sign in an appropriate location and replacing any copies that are damaged over time.



Free interpretation services poster, hanging at all HRA and DHS locations

This notice has been hanging in HRA locations since 2015. DHS locations previously hung similar posters informing clients of their right to interpretation services, but those signs have been replaced with the above for consistency.

In addition to this notice of free interpretation services, all HRA and DHS locations welcome clients to locations with similar multi-lingual signs in prominent locations.



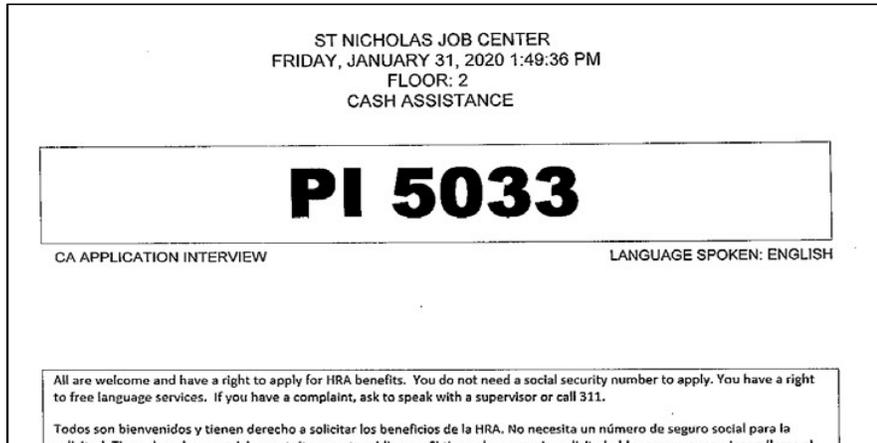
Welcome sign hanging in HRA and DHS offices

Most clients at walk-in HRA SNAP and Benefits Assistance Centers begin by using a self-service check-in kiosk, reducing wait times by allowing clients to generate their own service tickets. These kiosks, which are available in 12 languages, include accessibility features like a headphone jack and placement for wheelchair users. Agency policy requires that the area be staffed so that if clients are unable to use the kiosk for any reason, the staff can generate a ticket on their behalf.



Language selection screen at ticket-generating kiosks

In addition to giving a ticket number, the kiosk-generated ticket identifies the client's language of preference, thus creating an additional prompt for staff to inquire as to whether language services may be necessary, and alerting the client if a different preferred language is recorded. The ticket informs the client, in 12 languages, that free language services are available and that a Social Security number is not required to apply for HRA benefits.



Entry ticket, including offer of free language services

The self-service check-in kiosk also delivers a Notice of Free Interpretation Services (DSS-4) with each ticket. The Notice of Free Interpretation Services reads, in 12 languages, “You Have a Right to Free Interpretation Services. Please tell a worker if you want to speak with us in a language other than English or in sign language.... If you have a question, comment or complaint about the interpretation services provided, please call 311. Filing a complaint will not affect your case.”

This Notice of Free Interpretation Services (DSS-4) is also included, on 8.5x11 paper, in all HRA application and renewal packets.



DSS-4, Notice of Free Interpretation Services

For clients who use American Sign Language (ASL), the Agency, in conjunction with advocates and deaf community members, has developed an ASL Options card. The card uses simple graphics and terminology to communicate the options for receiving sign language interpretation.



ASL Options Card

In addition to these printed notices, there are several HRA and DHS outreach teams that meet and interact with the public, community-based organizations, and elected officials on a regular basis. All team members have access to interpretation services, and share information with members of the public regarding the Agency’s use of language services.

DSS/HRA/DHS does not use ethnic or community media specifically to notify the public about the availability of language services, but we do, occasionally, use multi-lingual media to advertise specific programs or opportunities. In 2023 and 2024, the Agency produced radio ads in seven languages and print ads in eight languages about the Fair Fares program.¹² Spanish speaking staff members did TV interviews on skimming and stolen benefits and the Office of Child Support Services produced print and social media ads in Spanish.

¹² Radio ads were produced in English, French, Haitian Creole, Hindi, Mandarin, Russian and Spanish. Print ads were in Bengali, English, French, Haitian Creole, Korean, Russian, Spanish and Urdu.

Section 5. Provision of language access services

A. Interpretation

In addition to bilingual staff, DSS/HRA/DHS provides interpretation services and language support at every interaction with our clients, whether that is in-person or on the phone.

The language access training provided by ORIA to all HRA and DHS front-line staff includes a detailed description of how to determine a client’s language of preference. Staff are instructed to ask every individual what language they prefer to use and offer interpretation services. If the individual is not able to identify their language of preference in English, staff have a language card available for clients to point to. Clients can also point to their language of preference on the free interpretation services poster that is hanging in every location.

If the interaction is occurring over the phone, or if the client does not point to a language, staff are instructed to contact our telephonic interpretation services vendor for additional support.¹³



IF YOU DO NOT KNOW THE LANGUAGE OF THE PERSON WHO WANTS YOUR HELP, USE THIS CARD. THE PERSON CAN POINT TO THE LANGUAGE NEEDED AND YOU CAN ARRANGE FOR AN INTERPRETER.

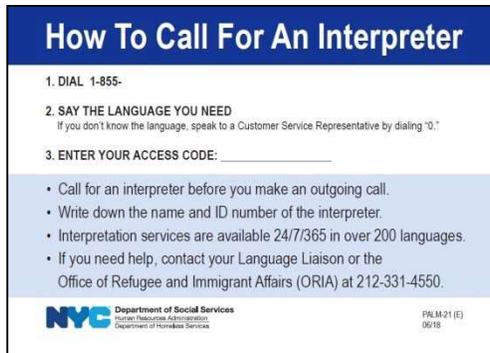
| | | | | | |
|---------|------------------------|---|---------|------------------------------|--|
| English | "Do you speak...?" | "Please be seated. I will call an interpreter for you." | Italian | Parla italiano? | Prego, si accomodi e attendo mentre le chiamo un interprete. |
| Arabic | هل تتكلم العربية؟ | الرجاء بالجلوس، سنقوم بالتكلم معك بلغة أخرى. | Korean | 한국어를 사용하십니까? | 편의사항입니다. 통역사를 불러 드리겠습니다. |
| Russian | Вы говорите по-русски? | Пожуйста, садитесь, пока я вызову переводчика за Вас. | Polish | Czy Pan/Pani mówi po polsku? | Proszę usiąść, podczas gdy wezwani tłumacza. |

Outside and inside of folded language selection card

Every DSS/HRA/DHS staff member has access to telephonic interpretation services, 24 hours a day/7 days a week/365 days a year. Staff are instructed to use language services at all interactions with clients or members of the public, including in-person appointments, walk-in visits, home visits, phone calls and public presentations or meetings. Telephonic interpretation services are provided by our vendor, Language Line Solutions.

All DSS/HRA/DHS staff are provided with an information card with a designated telephone number for interpretation services and an access code. These cards are distributed to new staff and redistributed at language access trainings each year. Additional cards can be ordered by program leaders or supervisory staff through the Agency’s online document request system.

¹³ Customer Service staff at Language Line Solutions use their knowledge of the most requested languages, multi-lingual interpreters and trial and error to assist in determining a client’s language of preference.



How to call for an interpreter palm card

In 2023, DSS/HRA/DHS, provided a historic high of 743,822 instances of telephonic interpretation services. This is an average of 2,037 calls per day (including weekends) and a 100% increase since before the COVID-19 pandemic. This reflects the rapid influx of asylum-seekers to New York City.

Under Local Law 73 (LL73), all DSS/HRA/DHS contracted providers are also required to provide telephonic interpretation services for clients. The Agency has recognized this as a challenge for our providers and has opted to share our contracted language services with many of our vendors. As of April 2024, there are approximately 400 providers who access the Agency’s telephonic interpretation services, sign language interpretation services or both.

In addition to telephonic interpretation services, many DHS and HRA staff and clients have access to in-person interpretation services. In September of 2022, in response to the increasing need to serve recently arrived asylum-seekers, DHS began to provide in-person Spanish language interpretation services at Intake locations and specific shelters that were supporting high numbers of newly arrived clients. As of April 2024, DHS continues to provide in-person interpretation services at 32 locations, including 9 locations where in-person interpretation services are offered 24 hours a day, 7 days a week.

Due to the increase in recently arrived asylum-seekers applying for Cash Assistance and SNAP benefits, in-person Spanish interpretation services are now also available during all open hours at five joint Benefits Access and SNAP locations. (One of the five locations also has Russian in-person interpretation services.)

In total, DSS/HRA/DHS provided 33,233 in-person interpretation shifts 2023.

All DSS/HRA/DHS staff, even those not stationed at a location that is regularly staffed with in-person interpreters, have access to in-person interpretation services to support any client who, for any reason, is unable to use telephonic interpretation services. This service is primarily, but not exclusively, used by the Adult Protective Services and IDNYC programs. In 2023, DSS/HRA/DHS provided 1,007 in-person interpreter appointments for specific clients.¹⁴

¹⁴ This total does not include in-person interpreter appointments to test/confirm digital media or IVR systems.

DSS/HRA/DHS also uses an in-person interpretation at all public hearings and community meetings to ensure these events are accessible to all attendees.¹⁵ When needed, DSS/HRA/DHS can also provide booths and headsets for public events.

In 2023, DSS/HRA/DHS provided sign language interpretation services 783 times, an average of 15 appointments every week. 86 of these appointments included the specialized services of a Certified Deaf Interpreter (CDI).¹⁶ Clients can schedule in-person ASL interpretation appointments via ASL Direct¹⁷ or simply walk into any open office and request video interpretation services, which are available in about 15 minutes.

The DSS Office of Community Outreach and Engagement hosts and participates in a wide variety of outreach and enrollment events each year. Most events are scheduled by or planned in partnership with community partners. The majority of the DSS's outreach staff are bilingual and interpretation services are always available. If a sponsoring community organization is not able to provide in-person interpretation services at a public presentation, those services can be requested through ORIA. At a tabling or enrollment event, staff will use telephonic interpretation services. At all in-person events, staff bring outreach materials in a wide-variety of languages and stress that language services are available in all Agency walk-in locations.

ORIA is responsible for monitoring the provision of all language services used by DSS/HRA/DHS staff members. Staff are instructed in the annual language access training to contact ORIA if they require additional support overcoming any language barriers or service issues.

B. Translation

In 2023, DSS/HRA/DHS processed 1,139 translation requests.¹⁸ This includes newly created documents, revisions to previous documents, previously un-translated documents, and client eligibility documents.

DSS/HRA/DHS has made a commitment to providing written translations that goes beyond the requirements set forth in Local Law 30. Rather than translating “the most commonly distributed documents” into 10 languages, DSS/HRA/DHS is currently translating all client- or public-facing documents into 11 languages – Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu. These commitments are reflected in the DSS policy on the translation of written documents.

¹⁵ In-person interpretation at public hearings can be provided in American Sign Language, Arabic, Bengali, Cantonese, French, Haitian Creole, Korean, Mandarin, Polish, Russian, Spanish, and Urdu. If other languages are requested, the Agency will provide additional languages at the hearing.

¹⁶ A Certified Deaf Interpreter (CDI) is a specialized interpreter who works with individuals who use a signed language other than American Sign Language (ASL) or who do not use any formal language (often referred to as “Home Sign”). A CDI works in conjunction with a formal ASL interpreter to restate and reimagine questions into expressions and gestures that are broadly understandable by almost anyone in the deaf community.

¹⁷ In partnership with the Mayor’s Office for People with Disabilities, ASL Direct is a full-time staff member at Infoline, the Agency’s call center, that answers video phone calls and provides answers and information to members of the deaf community. For additional details, see section 6A.

¹⁸ This number is an undercount, as some translation requests will include more than one document.

Since 2019, virtually every HRA-generated notice or form has been available in all 12 languages. In 2020 and 2021, DHS engaged in a large project to identify, update, simplify and translate many of their documents. As of 2023, DHS had met the legal standard set forth in LL30 – providing “the most commonly distributed documents” in 12 languages.¹⁹ All new public- or client-facing documents produced at DHS, including notices, forms, posters, and brochures are now being fully translated into all 11 Agency translation languages. Many of these translated forms are used by our provider partners as well.

DSS/HRA/DHS is aware that our written notices often include vital information that our clients and residents need to understand to gain access to benefits and move towards self-sufficiency. Beginning in 2024, the Agency will ensure that as many clients as possible can understand our written notices, by increasing our languages of translation to 15, adding Albanian, Italian, and Yiddish.

Access HRA, the Agency’s application and recertification portal, as well as the integrated mobile app will be available in 15 languages in 2024. In 2024, the additional three languages will be added to forms and notices as they are updated or revised. In 2025, any form that has not been translated into the additional languages will be completed.

For clients who are blind or low-vision, the Agency provides some documents in large print and other alternative formats, including audio format, screen readable documents and Braille. A set group of client-specific documents are regularly mailed to clients in Braille. In 2024 and 2025, the Agency hopes to utilize a New York State contract with a disability-services provider to improve the number and quality of forms, notices and documents that are produced and made available in alternative formats.

Staff in the Office of Policy, Procedures and Training (OPPT) write, design, and produce all the Agency’s client-facing documents. Public-facing documents, including brochures and signs, are produced by the Office of Communications and Marketing team. Prior to being submitted for translation, every document undergoes a “plain language review.” An HRA specific policy from 2016 requires that, to the extent possible, all public- or client-facing documents be written at a sixth-grade reading level or lower and icons, images, and formatting are used to enhance clarity. A second policy from 2017 requires a plain language review for all documents from DSS, HRA and DHS.

In addition to translating Agency-generated notices, DSS/HRA/DHS continues to provide clients with translations of their submitted documents when these documents are needed to prove eligibility for Agency programs. Most Agency benefits require proof of identify, income, and residency. If the documents that a client presents for this purpose are in languages other than English, the Agency provides the translations for these documents, rather than requiring that clients assume the expense of providing their own translations.

¹⁹ The Independent Living Plan (ILP) is a detailed, highly personalized document that creates a weekly record of the steps that a client needs to take to gain self-sufficiency and move out of shelter. The individualized nature of the plan, along with its short lifespan (the document is updated weekly), and the high volume (an ILP is done for every shelter case) makes professional translation challenging. The Agency is considering machine-translation options and hopes to find a solution for providing this important document in languages other than English in 2026. In the meantime, an oral interpretation of the ILP is provided to clients and written translations are available upon request.

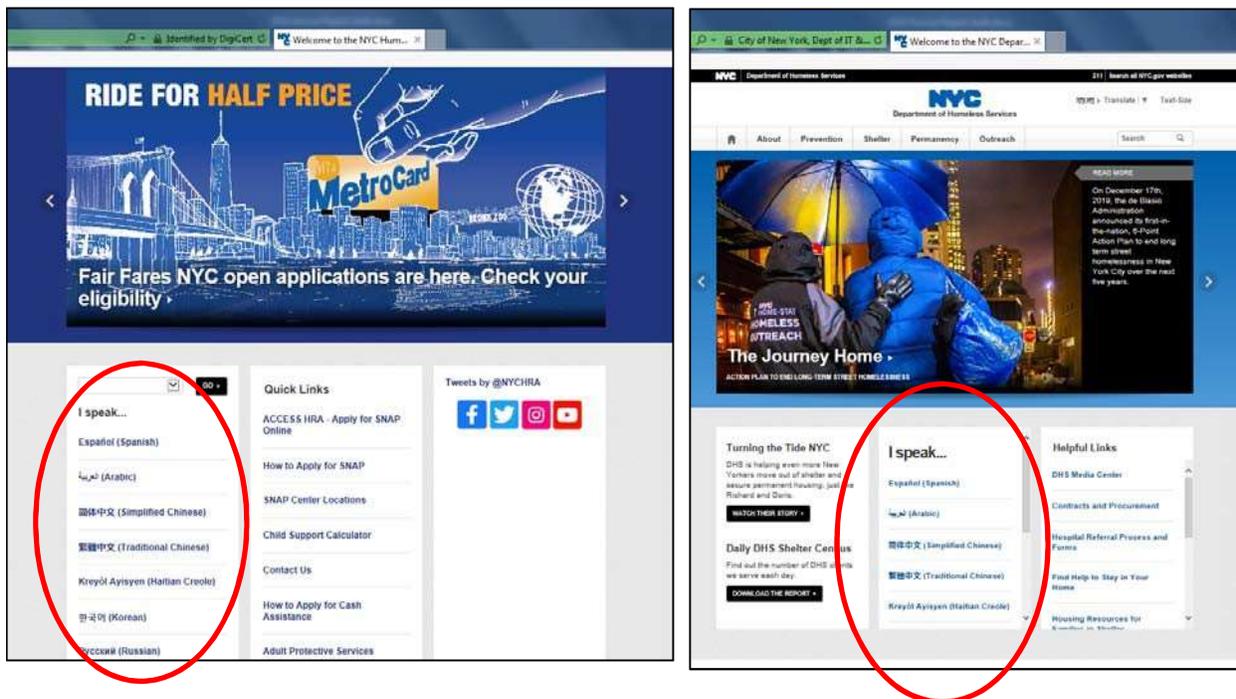
All DSS/HRA/DHS translations are processed through the Agency’s Written Translation Coordinator, a full-time staff person based in ORIA. Translations are solely provided by Language Line Solutions. By processing all of our translations through a single source and ensuring that we are providing document revisions rather than retranslating documents when they are updated, the Agency ensures consistent translations. ORIA tracks translation and formatting errors and addresses trends with Language Line leadership in regular meetings. In 2023, ORIA returned approximately 50 documents for translation or formatting errors, a 4% error rate. In addition, the Agency has a contract with CQ Fluency to review and provide a quality assurance check on any translation.

Staff are made aware of the availability of translations, how to access them, how to request additional translations and where to submit possible translation errors for review through the Agency’s detailed training on working with clients who prefer to communicate in a language other than English.

C. Digital Communication

In the digital age, DSS/HRA/DHS is committed to making information available to all clients via Agency websites and mobile applications. The HRA and DHS websites (nyc.gov/hra and nyc.gov/dhs) both include text, directly below the large banner at the top of the page, that indicates where readers of the 11 Agency- wide translation languages can click to get information in their language. Each language link navigates to a page, translated by a professional linguist, that summarizes the Agency’s programs and services and how to access those services. Links are available to access program applications, brochures and additional resources. Whenever possible, the links to these additional resources go directly to that resource in the appropriate language.

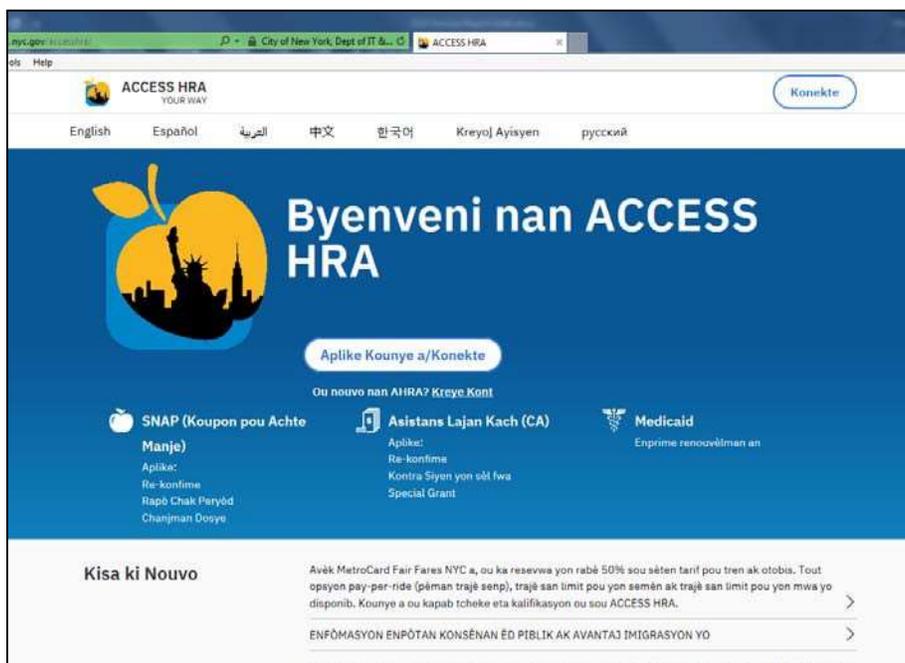
The Agency will add pages in the new designated languages, Albanian, Italian and Yiddish in 2024.



Multilingual portions of the HRA and DHS web sites

The nyc.gov/hra and nyc.gov/dhs web sites are audited annually by individuals with disabilities to ensure compliance with the Web Content Accessibility Guidelines (WCAG). The sites are complex and contain a huge number of documents, links and images. The Agency is committed to improving the accessibility of these sites and will be working to increase the number of screen readable documents and alt text available on the site.²⁰

Most Cash Assistance and SNAP clients apply and recertify their case through ACCESS HRA, a mobile responsive website and integrated mobile app. The portal and mobile app are screen-readable, reviewed for plain language, and available in Arabic, Traditional Chinese, Haitian Creole, Korean, Russian and Spanish. Using ACCESS HRA, individuals can apply for or recertify for Cash Assistance, SNAP benefits, child support programs, heating and cooling programs and see their case status, available benefit amount and any upcoming appointments. Clients can update their preferred language for receiving notices and change their mailing address or contact information or opt-in to the Fair Fares program – all in seven languages. Clients can also use Access HRA to see and review notices that the Agency has sent.



Access HRA home page in Haitian Creole

DSS/HRA/DHS is committed to having Access HRA and the corresponding mobile app, in 15 languages (adding Albanian, Bengali, Simplified Chinese, French, Italian, Polish, Urdu and Yiddish) by the fall of 2024.

In 2024, NYC residents who wish to apply for or renew an IDNYC card, must first make an appointment through IDNYC’s online appointment portal. The portal is professionally translated into all 11 Agency-designated languages. (Clients who are unable to use the IDNYC scheduling portal can make an appointment by calling 311.) The Agency is investigating options for adding additional languages to the IDNYC site.

²⁰ For details, see the Agency’s 5-year Accessibility Plan, available in 12 languages, here: [Disability Access - HRA \(nyc.gov\)](http://nyc.gov)

Finally, DHS is partnering with the Mayor’s Office for Economic Opportunity, who is spearheading a pilot document storage and sharing platform for families with children at the PATH intake location. My File, which is available in 14 languages,²¹ is a safe-space for families to keep electronic copies of their important documents and allows the family to easily share those documents with a variety of city-agencies as they seek additional services. To date, more than 900 families have taken advantage of this opportunity.

D. Emergency communications

DSS Emergency Management, which supports both HRA and DHS, works closely with ORIA to ensure that all clients can access services during an emergency. Together, these teams confirm that documents are translated, that appropriate multi-lingual signage and language identification tools are available at emergency sites, that interpreters can be contacted, and that staff are trained in the provision of language services.

According to New York City Emergency Management’s (NYCEM) Language Access Plan, if an emergency has the potential to affect 75 or more households, if a service center is activated or if language access needs exceed the responding agency’s ability to provide services, the Mayor’s Office of Immigrant Affairs (MOIA) convenes the Language Access Lead Team. The Lead Team consists of the primary agencies responsible for language access during emergencies, including DSS, and coordinates interagency efforts to address language access needs before, during and after an emergency.

The Lead Agency in an emergency is responsible for providing language services. DSS is the Lead Agency when disaster assistance service centers or family assistance centers are established in response to an emergency. In these instances, the DSS Emergency Management team and the language access team at ORIA coordinate interpretation services, in consultation with NYCEM and MOIA. Together, these groups provide support, including providing interpretation services, translated documents, signage, and contract support to NYCEM and the incident-lead Agency.

DSS/HRA is in regular contact with MOIA and NYCEM regarding these obligations. The Agency has participated in table-top exercises, “hot washes” and planning exercises with NYCEM and other agencies to ensure that we are prepared to take on these responsibilities when needed.

²¹ My File is available in Arabic, Bengali, Simplified Chinese, Traditional Chinese, English, French, Haitian Creole, Korean, Polish, Portuguese, Russian, Spanish, Ukrainian and Urdu.

Section 6. Resource planning

A. Bi-/multi-lingual staffing

While language services contracts and dedicated administrative teams represent important tools, DSS/HRA/DHS recognizes that our most valuable resource are front-line staff members who provide language services to thousands of clients daily. To provide the highest quality service to New York City's diverse, multi-lingual residents, DSS/HRA/DHS needs a diverse, multi-lingual staff. As of February 2024, the Agency had more than 1,123 self-reported bilingual staff members who collectively speak 90 languages.²² As per Agency policy, staff are permitted to communicate with clients in their shared language if the staff member believes that they are fully fluent. Staff do not need to be tested or approved to work with clients in languages other than English.

As a part of our commitment to a multi-lingual workforce, DSS is pleased to announce the success of our partnership in the ASL Direct program. In conjunction with DCAS and the Mayor's Office for People with Disabilities, DSS One Number (the Agency's call center) hired a staff member fluent in American Sign Language (ASL) in 2019. This staff member answers questions via a secure, confidential, internet video feed from members of New York's deaf and signing community.

B. Language service vendor contracts

As a large Agency with more than three million clients, DSS/HRA/DHS is fully committed to ensuring that all clients receive the language access services and support that they need. The Agency's contracts for telephonic interpretation, written translation, in-person interpretation and sign language interpretation reflect this level of dedication.

| Type of Service | Vendor | 2023 Instances | 2023 Expenditures |
|--|-------------------------------|----------------|-------------------|
| Telephonic Interpretation | Language Line Solutions, Inc. | 743,822 | \$ 6,187,747 |
| Written Translation | Language Line Solutions, Inc. | 1,139 | \$ 892,275 |
| Sign Language Interpretation (video & in-person) | Accurate Communication, Inc. | 1,069 | \$ 145,473 |
| In-Person Interpretation Appointments | Geneva Worldwide, Inc. | 1,560 | \$ 1,202,659 |
| In-Person Interpretation Shifts | | 3,138 | |
| Secondary In-Person Appointments | Accurate Communication, Inc. | 90 | \$ 13,143 |
| In-Person Interpretation Shifts for Asylum-Seekers | Accurate Communication, Inc. | 30,095 | \$ 9,672,450 |

²² Bilingual staff information is collected annually through a voluntary email survey to all staff.

| | | | |
|--|------------------------------|------------------------------|-----------|
| Quality Assurance for Written Translations | CQ Fluency Inc | 5 | \$ 4,895 |
| Alternative Format Documents | Vanguard | 8 large print 164 Braille | \$ 20,504 |
| CART Services | Accurate Communication, Inc. | 7 | \$ 2,250 |

Many of the Agency’s language service contracts, including those for telephonic interpretation services, in-person interpretation services, written translations and sign language services, come to an end in July 2025. Staff members from ORIA, the office of the Agency Chief Contracting Officer (ACCO), the Office of Management and Budget (OMB) and the Office of Legal Affairs (OLA), will work together to ensure that Agency services continue with no interruption of service.

C. Partnership with CBOs

DSS/HRA/DHS values our many productive and cooperative relationships with community-based organizations (CBOs) and our non-profit partners. Most of New York City’s shelters for families and individuals are managed and run by non-profit organizations. The Agency works with community organizations to provide rental assistance support, domestic violence services and legal services, among other things. In 2024, DSS/HRA will directly partner with community groups to support clients through the process of applying, receiving and maintaining a variety of public benefits.

In 2023, DSS/HRA/DHS did not engage in any contracts with community-based organizations for the purpose of providing language services. Our language services were all provided by corporate language service providers.

Section 7. Training

DSS/HRA/DHS has a training, developed by ORIA, that covers the language access services required by law, as well as all Agency policies and procedures regarding language access. The Agency's language access training reminds staff about the diverse communities that we serve, reviews federal, state, and local laws for providing language services to clients, and provides detailed instructions on how and when to access telephonic interpretation services, in-person interpretation services, sign language interpretation services, and written translations. Staff are challenged with a series of "tough situations" and reminded of the importance of accurately recording a client's language. Finally, the language access training provides ORIA's contact information in the event staff have any further questions or client communications challenges and require support.

All DSS/HRA/DHS front-line staff, including outreach staff, as well as their managers and supervisors, must receive language access training every year. The annual trainings rotate between being self-paced trainings (in which staff click through a variety of screens on their own) and being trainer-led on a virtual platform. Incoming staff also receive language access training during their on-boarding process. A similar training is available to contracted providers. Many staff receive the training from professional trainers at OPPT, but ORIA also conducts several train-the-trainer sessions and direct staff trainings each year. At HRA, staff trainings are tracked in the Online Training Tracking System (OTTS), a purpose-developed database. It also tracks who has registered for and completed trainings. At DHS, information about training registration and completion is tracked in a program called the Human Services Learning Center (HSLC). HSLC also houses DHS trainings for staff to access online or virtually.

In 2023, 3,367 HRA staff received the Agency's Language Access Training in a self-paced format.

ORIA updates the Agency's language access training whenever there are changes to the language access policies and procedures. Additionally, the trainings are also updated once a year to update the scenarios and ensure that the training is engaging.

In 2021, DHS rolled out an additional training, covering many of the same topics and scenarios, to all DHS provider staff. The Agency is committed to continuing to share this training resource with our providers, incorporating feedback and updates to ensure that each year our training is more relevant, more interesting, and more educational than the year before.

Section 8. Continuous improvement planning

A. Data collection and monitoring

The largest of HRA's program areas, Cash Assistance and the Supplemental Nutrition Assistance Program (SNAP), record client data in a state-controlled system called the Welfare Management System (WMS). For each case, WMS records a separate preferred language for speaking and reading. Language choices are listed in a drop-down menu of 106 speaking languages and 102 reading languages.²³

HRA employees enter information into WMS and record client interactions through an interface called the Paperless Office System (POS). For specific client interactions, including new applications, re-certifications and certain types of case changes, POS requires staff to record how language services were provided.

Throughout the Agency, other program areas use their own client tracking systems, including the CARES program at DHS, APSNet at the Adult Protective Services Program and HASAWeb for the HIV/AIDS Services Administration. All these programs track unique speaking and reading languages for each case. As a part of the Agency's mandated language access training, all staff are instructed to record how language services were provided and the interpreter ID number of a professional telephonic, in-person or sign language interpreter in the case notes portion of the client record. The only Agency client database that does not separately track spoken and reading language is CurRent, a program to track payments made directly to landlords on behalf of clients. The Agency is committed to separating the fields in this database by 2025.

ORIA is constantly monitoring the Agency's language services vendors, including reviewing multiple interpreter scheduling programs, hundreds of interpreter timesheets, and staff/client complaints, to ensure that our clients and staff are receiving the highest quality language services.

In 2023, DSS/HRA/DHS staff called for telephonic interpretation 743,822 times. The average wait-time to speak with an interpreter, across all languages, was 7.9 seconds.

In 2022 and 2023, as individuals from all over the world crossed the southern border and made their way to New York City, the number of Agency requests for telephonic interpretation services for West African languages increased significantly. Anecdotal information from staff and Language Line's call tracking data²⁴ suggested that not enough interpreters were available in these languages. While Language Line continues to actively pursue hiring additional interpreters, the Agency has approved the use of in-person interpreters to help address this need.²⁵

Language Line Solutions, which is also the DSS/HRA/DHS vendor for written translations, reviews each document for formatting and translation errors before the written translation is finalized and returned to the Agency. Out of 1,139 document translation requests in 2023, only approximately 50 documents

²³ Differences in the spoken versus written lists reflect a larger number of spoken Chinese dialects than there are forms of Chinese writing. Other variations reflect disability related options, such as Braille and sign language.

²⁴ DSS/HRA/DHS receives a financial credit from Language Line if the connect time in certain languages exceeds 30 seconds or if the connect time in any language exceeds 3 minutes.

²⁵ See section 9 for additional information on plans to address this need in the future.

(4%) were returned for errors. Despite having a low error rate, DSS/HRA/DHS has a secondary written translation vendor, CQ Fluency, to provide quality assurance and review of translated documents.

In addition to carefully monitoring service and contract data, ORIA engages regularly with center-based staff, program leadership, Agency outreach units, community-based organizations (CBOs), immigrant clients, and members of our Language Access Working Group for a full understanding of where our services need to be improved. The Office of Constituent Services tracks all language access complaints received by the Agency, 311, nyc.gov and/or other elected officials and shares this information with ORIA. By putting all these sources together, ORIA can quickly identify and correct any gaps in service in programs throughout the Agency.

B. Language access complaints

Members of the public can submit language access complaints, questions, or requests in any of the following ways:

- Call 311
- Call the One Number at 718-577-1399
- Call the DHS Ombudsman Unit at 800-994-6494
- Walk into the Ombudsman Office at 106 E 16th Street, 8th floor
- Call ASL Direct (video phone only) at 347-474-4231
- Click on “contact us” at nyc.gov/hra or nyc.gov/dhs
- Email ORIA at oria@dss.nyc.gov

All complaints or comments regarding DSS/HRA/DHS received through 311, Infoline, the Ombudsman Unit, ASL Direct, or “contact us” are directed to the DSS Office of Constituent Services. Issues are summarized by agents and then sent as emails that are uploaded directly into the Internet Quorum (IQ) program. Any complaints that include a language component are forwarded to ORIA, or to ORIA and a specific program area for resolution. If a complaint is solely limited to language services concerns, ORIA will work with the program involved to ensure that all staff are reminded of their language access duties and address any systematic language access concerns. If substantive case issues are involved as well, ORIA will work with the appropriate program to ensure that both substantive case issues as well as language access concerns are addressed.

Complaints received at walk-in sites or residential locations are managed by the leadership team at that location.

Complaints received by ORIA are resolved through the same process as the Office of Constituent Services.

As discussed in detail in Section 4, DSS/HRA/DHS informs clients of their right to free interpretation services through four primary means: a free interpretation services poster, a welcome poster, the ticket notice, and a printed notice of free interpretation services. All four of these documents refer clients to 311 for language access complaints.

Section 9. Goals and actions planning

The implementation of this Language Access Implementation Plan will be overseen by ORIA, under the leadership of the Language Access Coordinator: Cheryl Wertz, Director of Language Access. The Language Access staff at ORIA will work with Agency leadership, program leaders and technical staff to ensure that each of the policies and procedures listed in this report is followed by front-line staff and that goals and timelines included here are met.

This implementation plan will be updated at least once every three years and the updates will be posted on nyc.gov/hra and nyc.gov/dhs, as required by Local Law 30. Intermediary plans will be created and posted more frequently if deemed necessary by DSS’s Language Access Coordinator and Agency leadership.

Details on the implementation plan of the Agency’s 2024 – 2027 language access goals are below.

| Language access goal | Milestones | Responsible staff | Deadline |
|--|--|---|--|
| <p style="text-align: center;">Translate Agency-generated documents in Albanian, Italian and Yiddish</p> | <ul style="list-style-type: none"> ▪ Update written translation policy to require all documents, including forms, notices, brochures, fliers and posters to be in 15 languages. ▪ All newly created documents to be translated into 15 languages. ▪ Add three new languages to all requests for revisions or updates of any current document. ▪ Review current forms that have not been updated or revised to add 3 new languages. | <ul style="list-style-type: none"> ▪ Office of Refugee and Immigrant Affairs (ORIA) ▪ Office of Communications and Marketing (OCM) ▪ Office of Policy, Procedure and Training ▪ Information Technology Systems (ITS) ▪ Program staff | <ul style="list-style-type: none"> ▪ June 2024 ▪ May 2024 ▪ May 2024 ▪ Aug. 2025 |

| | | | |
|--|--|---|---|
| <p>Add Albanian, Italian, and Yiddish to Agency digital communications</p> | <ul style="list-style-type: none"> ▪ Add text in additional languages to nyc.gov/hra and nyc.gov/dhs. ▪ Add Albanian, Italian, and Yiddish to kiosks at PC banks. ▪ Add additional languages to the IDNYC appointment scheduling site. | <ul style="list-style-type: none"> ▪ ORIA ▪ ITS ▪ Program Staff ▪ IDNYC ▪ OPPT | <ul style="list-style-type: none"> ▪ July 2024 ▪ Jan. 2025 ▪ July 2025 |
| <p>Translate Access HRA web portal into 15 languages</p> | <ul style="list-style-type: none"> ▪ Identify a vendor who can provide an appropriate translation of a complex site. ▪ Engage in the contracting process to bring designated vendor onboard. ▪ Provide immediate machine-translation into 8 additional languages. ▪ Improve the site with human review of the machine translation. ▪ Maintain content with updates. | <ul style="list-style-type: none"> ▪ ORIA ▪ ITS ▪ Business Process Innovation (BPI) ▪ Agency Chief Contracting Office (ACCO) ▪ Program staff | <ul style="list-style-type: none"> ▪ June 2024 ▪ July 2024 ▪ July 2024 ▪ Oct. 2024 ▪ Ongoing |
| <p>Translate Access HRA mobile app into 15 languages</p> | <ul style="list-style-type: none"> ▪ Identify a vendor/process that meets the technical needs of the site, while keeping the content/translation identical to the web portal. ▪ Engage in the contracting process to bring designated vendor onboard. ▪ Monitor to ensure that the mobile app continues to match the web portal. ▪ Maintain content with updates. | <ul style="list-style-type: none"> ▪ ORIA ▪ ITS ▪ Business Process Innovation (BPI) ▪ Agency Chief Contracting Office (ACCO) ▪ Program staff | <ul style="list-style-type: none"> ▪ May 2024 ▪ June 2024 ▪ July 2024 ▪ Ongoing |

| | | | |
|---|--|--|---|
| <p>Renew language services contracts</p> | <ul style="list-style-type: none"> ▪ Engage in a task order to DCAS designated vendor for telephonic interpretation services. ▪ Post an RFx for in-person interpretation services. ▪ Post an RFx for written translation services. ▪ Post an RFx for sign language interpretation services. ▪ Engage vendors for all 4 services without a gap in service. | <ul style="list-style-type: none"> ▪ ORIA ▪ ACCO ▪ Office of Management and Budget (OMB) ▪ Office of Legal Affairs (OLA) | <ul style="list-style-type: none"> ▪ April 2025 ▪ Feb. 2025 ▪ Feb. 2025 ▪ Feb. 2025 ▪ July 2025 |
| <p>Engage a new vendor to provide additional documents in alternative formats</p> | <ul style="list-style-type: none"> ▪ Identify a process for buying into a NYS contract. ▪ Write and approve Agency policy on when each format should be offered and approved. ▪ Engage an appropriate vendor in the contracting process. ▪ Identify a technical process for sharing documents and client data with the vendor who will be providing the alternative format documents. ▪ Identify a QA process for ensuring that the appropriate documents are sent to the appropriate client. ▪ Maintain the contract with appropriate funding levels. | <ul style="list-style-type: none"> ▪ ORIA ▪ OLA ▪ ACCO ▪ OPPT ▪ ITS ▪ Program staff | <ul style="list-style-type: none"> ▪ June 2024 ▪ Aug. 2024 ▪ Jan. 2025 ▪ April 2025 ▪ July 2025 ▪ Ongoing |

| | | | |
|--|---|--|--|
| <p>Separate language spoken and written fields in CurRent database</p> | <ul style="list-style-type: none"> ▪ Current language field to be relabeled as “preferred spoken language.” ▪ New field added to gather “preferred written language.” ▪ Systems changes implemented to generate notices based on new field. | <ul style="list-style-type: none"> ▪ ITS ▪ Homelessness Prevention Administration (HPA) ▪ ORIA ▪ ITS | <ul style="list-style-type: none"> ▪ Jan. 2025 ▪ March 2025 ▪ Aug. 2025 |
| <p>Independent Living Plan document available in 15 languages</p> | <ul style="list-style-type: none"> ▪ Agency program and technical staff to consider whether machine-translation is a viable option. ▪ MOIA, OTI to approve the use of machine translation. ▪ Identify an appropriate vendor who can provide a machine-translation of an individualized document while maintaining Agency privacy protocols. ▪ Engage in a contract with that vendor. ▪ Write procedure/policy for staff on how to access the new ILP translation procedure. ▪ Provide quality assurance that the translations being generated by the vendor are appropriate and understandable. ▪ Provide quality assurance that the translated ILP documents are being shared with clients. | <ul style="list-style-type: none"> ▪ ORIA ▪ Office of Program Development & Implementation (OPDI) ▪ ITS ▪ Mayor’s Office of Immigrant Affairs (MOIA) ▪ Office of Technology and Innovation (OTI) ▪ ACCO ▪ OPPT ▪ DHS program staff | <ul style="list-style-type: none"> ▪ Nov. 2024 ▪ Jan. 2025 ▪ April 2025 ▪ July 2025 ▪ July 2025 ▪ Aug. 2025 ▪ Aug. 2025 |

| | | | |
|--|---|---|---|
| <p>Decrease wait times for telephonic interpretation in West African languages</p> | <ul style="list-style-type: none"> ▪ Increase the number of interpreters available in West African languages. ▪ Reduce the average wait time for interpreters in the most commonly requested West African languages to under three minutes. | <ul style="list-style-type: none"> ▪ ORIA ▪ Language Line | <ul style="list-style-type: none"> ▪ Aug. 2025 ▪ May 2025 |
|--|---|---|---|