

Language Access Implementation Plan

Agency name:

The Mayor's Office to End Domestic and Gender Based Violence

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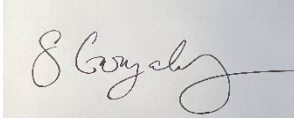
June 28, 2024

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 services the agency provides
6	Resource planning	How the agency ensures that it has the internal and external resources to provide language services
7	Training	How the agency trains the staff to provide language services
8	Continuous improvement planning	How the agency ensures ongoing improvement of language access
9	Goals and actions planning	How the agency will put the plan into action

Signatures

The signatures signify that agencies will take necessary steps to advance equity and inclusion of individuals with LEP.]



June 17, 2024

Sara Gonzalez

Date

Language Access Coordinator, Mayor's Office to End Domestic and Gender Based Violence



June 17, 2024

Saloni Sethi

Date

Acting Commissioner, Mayor's Office to End Domestic and Gender Based Violence

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I. Agency Mission and Services

A. Mission

ENDGBV supports survivors of domestic and gender-based violence by developing and delivering accessible and inclusive services to survivors, their families, and communities through collaboration with government agencies, community partners, survivors, and philanthropy. We strive to ensure that the City's services and resources reduce barriers, address gaps in service, and create new pathways to safety through program development, legislative and policy advocacy, research, training, community-based initiatives and engagement, and operation of the New York City Family Justice Centers.

B. Services: NYC Family Justice Centers, Community Engagement, Training, Program Implementation, and Research

1. NYC Family Justice Centers

The NYC Family Justice Centers (FJC) provide free and confidential assistance for victims and survivors of domestic and gender-based violence, which can include sexual violence, human trafficking, stalking, and intimate partner violence. All Centers are open Monday through Friday, from 9 a.m. to 5 p.m. No appointment is needed. At any NYC FJC, survivors of domestic and gender-based violence and their children can get connected to organizations that provide case management, economic empowerment, counseling, civil legal, and criminal legal assistance. Located in all five boroughs, FJCs are safe, caring environments that provide one-stop services and support. Key City agencies, community, social and civil legal services providers, and District Attorney's Offices are located on-site at FJCs, to make it easier for survivors to get help.

All are welcome regardless of language, income, gender identity, or immigration status. Interpretation services are available on-site at every FJC, and locations are wheelchair accessible.

2. Community Engagement

ENDGBV's engages New York City communities through a wide variety of public engagement and education efforts, including: conducting workshops and organizing and or supporting community events for community members and organizations; sharing information through tabling, resource fairs, and supporting community events, as well as through partnerships with sister agencies and community-based organizations; and building the capacity of local communities to prevent, recognize, and respond to Gender Based Violence.

3. Training

ENDGBV provides tailored trainings to City agencies and CBOs on topics across the spectrum of Gender Based Violence, as well as providing technical assistance in the review and development of their policies and protocols. We also engage in workshops at community events and conferences.

4. Program Implementation

ENDGBV recognizes that a part of our responsibility as a government entity is to collaborate with other government agencies and offices on internal policies and programs that address domestic and gender-based violence as well as support the Community Based Organizations providing services to the community they are in through funding and supportive coordination. Some initiatives we coordinate, and support are Arts-Based Initiatives & Partnerships Interrupting Violence at Home (programs for adults and young people), and a survivor led group called Voices.

ENDGBV also supports school-based programs like RAPP (Relationship Abuse Prevention Program), ERAPP (Early Relationship Abuse Prevention Program), and "The ABCs of Healthy Relationships". These programs are designed to help high school, middle school, and elementary school children develop healthy relationships throughout their youth and into adulthood. In addition, ENDGBV organizes and participates in advisory boards that seek to end domestic and gender-based violence. Topics of some advisory boards include street harassment prevention, female genital mutilation or cutting, and trafficking.

5. Research

ENDGBV's Research and Evaluation unit provides data management and support to all ENDGBV units, programs, and initiatives, and conducts multi-disciplinary research projects with interagency research partners to inform future work concerning the prevention and response to gender-based violence. The Unit also provides evaluation and data management support to other agencies with programs that assist survivors of gender-based violence.

II. Agency Language Access Policies

ENDGBV aims to ensure that all New Yorkers, including those with limited English proficiency (LEP), have meaningful access to the information and services administered or operated by the Office, including outreach efforts, training and prevention education, external agency communications, and the five NYC Family Justice Centers (FJs). At the FJs, language access is provided via telephonic interpretation service and/or training provision in non-English languages, translated materials, American Sign Language (ASL) interpretation, Communication Access Real-time Communication (CART) services, and other means, as appropriate. All provider staff at the FJs, including contracted and in-kind providers, have access to City contracted language access services through ENDGBV. Signage informing LEP clients of the right to an interpreter and the right to file a complaint with a manager and/or via 311 are posted in conspicuous locations throughout FJ facilities. This signage, provided by the Mayor's Office of

Immigrant Affairs (MOIA), provides information in New York City's ten designated citywide languages – Spanish, Chinese, Russian, Haitian Creole, Bengali, Korean, Arabic, Urdu, French and Polish.

All ENDGBV staff and FJC on-site partner agency staff members who work with members of the public are provided information on language access rules, and instructions on using telephonic interpretation during orientation. This training is part of a larger orientation to FJC policies and procedures. The Language Access Coordinator is in the process of making bite sized training and resource videos to be readily available and easily accessible to all ENDGBV staff and partner agencies.

Due to COVID-19, the FJCs began operating remotely in March 2020, providing critical services to survivors of domestic and gender-based violence over the phone. Staff relied heavily on Cyracom to help provide telephonic interpretation and translate voicemails from new and existing clients. FJCs have since restored in-person services and continue to offer remote services via telephone.

A. Accessibility of Interpretation

At the FJCs, ENDGBV staff and FJC on-site partner agency staff use telephonic interpretation, in-person interpretation (in limited circumstances), or provide services in an LEP client or community member's non-English language, if the provider is fluent or sufficiently proficient to communicate meaningfully and effectively in that non-English language. ENDGBV recognizes that LEP or non-English primary language speakers may, at times, find it difficult to discuss topics related to violence, abuse, violation, trauma or complex systems-related themes when speaking in a language other than their primary or first language. For these reasons, ENDGBV provides interpretation to all LEP clients and community members engaging with the FJC in any capacity, whether they are working directly with ENDGBV staff or with contracted or in-kind providers. This interpretation shall be available if the LEP or non-English primary language speaker requests, regardless of the LEP person's ability to otherwise generally communicate in English.

B. Use of Children, Friends, and Family as Interpreters

ENDGBV has policies in place that strictly prohibit staff at the FJCs from using minor children to act as interpreters during any client or community member engagement, except in an emergency to understand an immediate need. Additionally, the use of adult children, relatives, friends of clients and community members are also not to provide interpretation. In an FJC setting, adult children, relatives, and friends of the client seeking services may only be utilized to communicate basic information or after the LEP person seeking services meets alone with staff and discusses, using telephonic interpretation, the general policy against and potential complications or concerns arising from the use of adult children, relatives, or friends as interpreters. Additionally, it is communicated that confidentiality or privilege may be jeopardized if an adult child, relative, or friend is present in a room or used as an informal interpreter. Currently, all efforts are made to engage clients who are deaf or hard-of-hearing and do not communicate through ASL as drop-ins to schedule an appointment to have an interpreter be present. ENDGBV is currently exploring options for real time ASL interpretation.

C. Written Communications

ENDGBV requires the use of plain language in all public-facing materials, including any online content. All document translations must be completed by a certified translator, either through the Office’s contracted vendor, or through use of the Citywide Volunteer Language Bank (VLB). Translated documents must be reviewed for coherence, sensitivity to gender-based violence, and content by multilingual agency staff, partner agencies, or through the VLB before they are finalized.

III. Language Access Needs Assessment

To plan for and effectively provide language access services, agencies assess and understand the needs of the public with Limited English Proficiency. This section presents the “four-factor analysis,” a tool that helps agencies assess language access needs.

A. Factor 1: the number or proportion of LEP persons in the eligible service population

Total Population of LEP that Speak a Language other than English at Home in NYC: 1,816,630

New York City			
Rank	Language	Population	%
1	Spanish	865,331	47.6
2	Chinese (incl. Mandarin, Cantonese, and Min Nan Chinese)	337,286	18.6
3	Russian	117,404	6.5
4	Bengali	65,289	3.6
5	Yiddish	39,452	2.2
6	Haitian-Creole	36,582	2.0
7	Korean	36,380	2.0
8	Arabic	27,613	1.5
9	French	24,648	1.4
10	Polish	24,039	1.3

Table 1: This table depicts the top ten languages other than English spoken at home other by those with Limited English Proficiency in NYC as per the Department of City Planning’s 2021 ACS 5-Year Data Set.

	Bronx	Brooklyn	Manhattan	Queens	Staten Island
	Language	Language	Language	Language	Language
1	Spanish	Spanish	Spanish	Spanish	Spanish
2	Bengali	Chinese (incl. Mandarin, Cantonese, and Min Nan Chinese)	Chinese (incl. Mandarin, Cantonese, and Min Nan Chinese)	Chinese (incl. Mandarin, Cantonese, and Min Nan Chinese)	Chinese (incl. Mandarin, Cantonese, and Min Nan Chinese)
3	French	Russian	French	Bengali	Russian
4	Akan (incl. Twi)	Yiddish	Japanese	Korean	Albanian
5	Albanian	Haitian-Creole	Russian	Russian	Italian
6	Chinese (incl. Mandarin, Cantonese, and Min Nan Chinese)	Arabic	Korean	Polish	Arabic
7	Arabic	Urdu	Hebrew	Punjabi	Polish
8	Italian	Bengali	Italian	Haitian-Creole	Korean
9	Russian	Polish	Bengali	Greek	Urdu
10	Vietnamese	Italian	Arabic	Italian	Ukrainian

Table 2: This table depicts the top ten languages other than English spoken at home in each borough of NYC as per the Department of City Planning 's 2021 ACS 5-Year Data Set.

B. Factor 2: the frequency with which LEP individuals encounter the agency

New York City			
Rank	Language	# Clients	%
1	Spanish	9,029	84.79
2	Mandarin/Cantonese	446	3.30
3	Bengali	351	3.30
4	Russian	255	2.39
5	Arabic (All Dialects)	252	2.37
6	French	131	1.23
7	Urdu	94	0.88
8	Haitain- Creole	47	0.44
9	Korean	28	0.26
10	Portuguese	16	0.15
		10,649	

Table 3: This table depicts the top 10 languages of LEP individuals who engage in services at the FJCs across the 5 boroughs from 2021-2023.

	Bronx	Brooklyn	Manhattan	Queens	Staten Island
	Language	Language	Language	Language	Language
1	Spanish	Spanish	Spanish	Spanish	Spanish
2	Bengali	Russian	Mandarin/Cantonese	Mandarin	Arabic (All Dialects)
3	French	Mandarin/Cantonese	French	Bengali	Russian
4	Arabic (All Dialects)	Arabic (All Dialects)	Arabic (All Dialects)	Arabic (All Dialects)	Mandarin/Cantonese
5	Urdu	Bengali	Bengali	Russian	Albanian (Gheg & Tosk)
6	Mandingo	Urdu	Russian	Urdu	Urdu
7	Soninke	Creole	Portuguese	French	Bengali
8	Japanese	Uzbek	Urdu	Polish	French
9	Portuguese	Haitian Creole	Korean	Korean	Sinhalese
10	Bambara	French	Japanese	Hindi	Hungarian

Table 4: This table depicts the top 10 languages spoken by LEP individuals who engage in services at the FJCs per borough from 2021-2023.

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

Due to the often-complex circumstances of gender-based violence, a holistic and multifaceted approach to services and systems is critical for a survivor or victim to work toward safety and stability during and after instances of violence or abuse. These services may include case management, counseling, psychiatric care, safety planning, civil legal services, housing and public benefits assistance, and/or speaking with law enforcement agencies, including prosecutors and police. Language access services are essential for the provision of these critical services to LEP victims and survivors of trauma and abuse. This is especially true for instances when a victim or survivor may need to recall their victimization in detail when seeking immigration remedies, filing police reports, or meeting with prosecutors.

LEP communities across the City also have unique needs when it comes to identifying domestic and gender-based violence, raising awareness of critical resources for survivors, and addressing barriers faced when help seeking. To reach survivors from culturally and linguistically distinct backgrounds, outreach efforts must include both translated materials and real-time interpretation. Similarly, any efforts to solicit feedback and understand the experiences of diverse groups of survivors through research must include language access services to ensure inclusion for LEP populations.

Our data shows that across all five FJCs our office engages with majority of the top 10 languages spoken at home other than English, but differences like Yiddish and Polish—regardless of our materials being in Polish – may indicate a need for specialized engagement and awareness-raising of our services in these specific communities. Also, when looking at the languages specific to each FJC, we find more languages that our content could be translated into beyond the legally required languages. ENDGBV will use this data on additional language needs to inform current and future translations for our content in addition to our outreach.

The public also has access to interpretation for trainings and community events our office host by emailing our Language Access Coordinator at accessendgbv@endgbv.nyc.gov.

D. Factor 4: the resources available to the agency and the costs of providing various types of language

1. Resources Available

Family Justice Centers and Community Engagement

a. FJCs

ENDGBV administrative staff and partner agency staff located at the FJCs have:

1. Access to telephonic interpretation provided by Cyracom, in over 240 languages.
2. Dual-handset telephones available in reception areas for telephonic interpretation in open spaces.
3. Speaker telephones for telephonic interpretation in private or enclosed office spaces.
4. Multilingual “I speak” signs at each FJC.

b. Community Engagement

1. Access to telephonic interpretation provided by a City-contracted provider, in over 240 languages.
2. Multilingual and diverse staff and access to other multilingual staff from City agency and community-based partner organizations.
3. Informational handouts distributed by the Outreach Team, which include:
 - A handout about ENDGBV and the NYC 24-hour Domestic Violence Hotline is available in a multi-language accordion-fold pocket document, which includes English, Spanish, Russian, Chinese, Arabic, and Bengali

2. Cost of Providing Language Services

Telephonic interpretation continues to be our primary accessible language service. ENDGBV did not see a significant increase in minutes used from 2022 to 2023, and therefore the increase in cost may be attributed to vendor fees.

ENDGBV Interpretation Services Expenses				
Calendar Year 2021				
	\$ Amount	ASL	\$ Amount	Total
Telephonic	\$ 44, 472.89		\$8, 517.72	52,990.61
Calendar Year 2022				
	\$ Amount	ASL	\$ Amount	Total
Telephonic	\$52, 335.96		\$8,966.32	\$61, 302.28
Calendar Year 2023				
	\$ Amount	ASL	\$ Amount	Total
Telephonic	\$103,555.54		\$4,087.50	\$107,643.04

Table 5: This table depicts the interpretation services expenses from 2021-2023.

IV. Notice of the Right to Language Access Services

The Mayor's Office to End Domestic and Gender Based Violence currently uses several strategies to inform members of the public with limited English proficiency of their right to resources that exist in their language. The current strategies are:

- Easy-to-understand multilingual signages at the Family Justice Centers announcing the availability of free interpretation services
- "I speak" cards
- Multilingual content on website
- Multilingual written notices
- Multilingual outreach materials at events

ENDGBV's Language Access Coordinator and Acting Deputy Commissioner of External Affairs and Community Initiatives will create a Language Access Communications Plan for multilingual media, graphics and recordings.

V. Provision of Language Access Services

Language Access is considered in all office communications, including electronic media and ethnic and community media, for general content, as well as communications in the case of an emergency. For all public-facing events, trainings, and conferences, ENDGBV includes information about accessibility on materials, along with instructions for requesting interpretation and other accommodations. ENDGBV staff interaction with the public includes in-person service delivery, outreach activities, training, and written and telephonic correspondence. Because language access is necessary to be able to provide services to survivors of domestic and gender-based violence, the Mayor's Office to End Domestic and Gender Based Violence has multiple services for language access and structures in which we provide it. This section describes our work with interpretation (telephonic and in-person), translation, digital communication, and emergency preparedness.

A. Interpretation

1. In-Person Interpretation

ENDGBV has multilingual and diverse staff throughout the office who can provide in-person interpretation. This capacity is enhanced through contracted provider staff at the FJCs, many of whom are multilingual and come from diverse backgrounds. For FJC clients who require in-person interpretation in a language that is not available through ENDGBV or partner staff, staff at the FJCs can provide in-person interpretation for languages spoken throughout the City, including American Sign Language, through contracted City vendors. After a language is identified via I-speak cards or telephonically, any in-person interpretation must be requested ahead of time for accommodation to be arranged since in-person interpretation vendors require advance notice. In-person interpretation services can be provided at the FJCs on subsequent visits, provided that a member of the ENDGBV

administrative team at the FJC is advised of the need. All FJC staff are trained on how to make in-person interpretation requests.

In 2023, ENDGBV created a system for internal complaints, to ensure proper feedback is sent to vendors with the hope of enhancing services. We are currently exploring a the most accessible way for the public to have access to this current structure.

2. Telephonic Interpretation

FJC staff have access to telephonic interpretation via a City-contracted provider that provides interpretation into any language necessary.

The FJCs provide telephonic interpretation to all LEP or non-English primary language speakers who request the service, regardless of the person's ability to communicate in English otherwise.

All FJC staff are trained to use telephonic interpretation and to identify potential challenges with interpreters. If low quality or inappropriate interpretation is provided, staff will follow the procedures outlined in the Language Access Complaints section of this plan and report the issue to the appropriate ENDGBV staff member.

3. Staffing and Contracts

Information about staffing and contracts can be found in Bi/multi-lingual staff under section **V. Resource Planning**.

4. Outreach, Community Events, and Trainings

a. Outreach and Community Events

ENDGBV is working to develop data-driven outreach and community engagement strategies. For example, using the information from Tables 2 and 4 in the "Language Access Needs Assessment" section, ENDGBV will translate our outreach materials into the languages commonly needed at the FJCs. ENDGBV will also identify LEP communities for outreach based on rates of LEP FJC client service engagement versus citywide and borough-specific LEP populations and through information collected from community-based organizations and stakeholders to identify which high needs communities we are currently not reaching. Materials for culturally specific events, including flyers, are translated into the necessary languages, and include information on how to request interpretation. The staff responsible for community engagement currently have capacity to deliver services in English, French, Spanish, Arabic and Haitian Creole. If these staff encounter a member of the public speaking a non-English language, all efforts are made to connect that person with information in their language, either through a staff member who speaks the language or through telephonic interpretation. All staff have access to telephonic interpretation through a City-contracted provider, available in over 240 languages. Additionally, ENDGBV's standard informational

materials are available in multiple languages: English, Spanish, Russian, Chinese, Arabic, Bengali, Haitian Creole, Korean, Urdu, French, and Polish, and Japanese.

We have traditionally translated materials in languages beyond the top 10 upon request either from ENDGBV staff or external partners and community members, but we plan to take a more pro-active approach by translating materials into borough-specific languages spoken at home other than English and languages community partners and interagency workgroups are seeing as an emerging need. For example, ENDGBV is a part of an interagency asylum-seeker working group and will use information from the Office of Asylum Seeker Operations (OASO) and the Mayor's Office of Immigrant Affairs (MOIA) on that population's language needs to inform future translations for pamphlets on Intimate Partner Violence, Sexual Violence, Family Violence, and Trafficking into additional languages:

b. Public Trainings

All public training flyers have information for language interpretation requests. Recognizing that English only flyers still present a barrier, the Language Access Coordinator along with Acting Deputy Commissioner of Community Initiatives and External Affairs will meet to discuss best practice for translated flyers, outreach, and managing potential requests for interpretation.

B. Translations

The vendor for translated documents is Language Line. The Language Access Coordinator, currently Sara Gonzalez, oversees the translation process, which includes quality assurance. Quality Assurance follows 3 tracks: 1st utilizing internal staff with language capacity as content experts, 2nd utilizing partner agency staff with language capacity, and 3rd utilizing the volunteer language bank for languages the office does not have access to.

ENDGBV prioritizes primary documents (documents directed at the public) for translations over secondary documents (internal documents). Prioritization of documents is by order of request. In 2021, the Language Access Coordinator created an IRM to track translation requests and a memo was sent to all staff informing them of the translation process, starting from plain language to quality assurance. In addition to documents, ENDGBV is exploring the process to eventually create protocol for social media translations.

ENDGBV will prioritize language access by: (1) considering where materials can be designed to be multilingual and use English plus the ten designated languages; (2) ensuring that any new documents follow plain language guidelines; and (3) continuing to translate all completed documents into the designated languages. Translated materials will be posted on ENDGBV's website, where they can be accessed by both provider staff and members of the public.

1. Plain Language

ENDGBV recognizes the importance of plain language to make our public facing work and information about domestic and gender-based violence accessible. It is also extremely important to the translation

process. From 2021 ENDGBV has been able to have 30 employees receive a 1.5 day long Plain Language training. The hope is for all staff to receive the training.

In 2024, the Language Access Coordinator created a Plain Language Review Procedure documenting the best practice for message creation and how to request a plain language review by the LAC. As of 2024, all public facing documents, including research and annual reports, must receive plain language review.

Since our most recent documents are in plain language, ENDGBV has taken on the large task of retroactively reviewing all our work for plain language, specifically our website. We hope to have the review completed by 2025.

C. Digital Communications

ENDGBV continues to apply our prioritization of content and plain language to our digital communications. In 2023, ENDGBV increased language access to our NYC HOPE Portal by contracting with Smartling to provide human translations of the information on the NYC HOPE Portal. NYC Hope provides comprehensive information on services available to survivors of domestic and gender-based violence throughout the five boroughs.

For website translation, the office's website currently uses the Google Translate plug-in to provide access for LEP individuals until the retroactive plain language review of site is completed. Materials that the office has already translated into the City's designated languages are available on ENDGBV's website as PDFs.

ENDGBV will continue to explore additional paths and funding to enhance the human translation of online content, especially once our website's plain language review is complete. The Office does not frequently post content in multiple languages on social media. Following ENDGBV's restructure and updated mission for the office, the Deputy Commissioner of External Affairs and Community Initiatives and the Language Access Coordinator are currently planning to enhance the overall accessibility of our communications, including through multiple language media, alt-text, closed captions, and engagement with ethnic media.

1. Licenses, Permits, and Registrations

N/A

D. Emergency Preparedness

ENDGBV and its programs continue operations during emergencies as determined by City officials and utilize standard processes to provide language access through telephonic interpretation, as well as by staff that are fluent or proficient in the non-English language of the client seeking assistance during an emergency, as appropriate. ENDGBV will forward relevant

emergency notifications from the Office of Emergency Management (OEM), available with links in over 12 languages, on its social media accounts. Additionally, in the case of weather or other emergencies, the FJCs may post printed standard notifications in 12 languages, as provided by OEM, in conspicuous locations at relevant sites.

In the past few years, the emergencies that New York has faced include a pandemic, earthquake, poor air quality due to wildfires, and bomb threats. At the start of the COVID-19 pandemic and resulting stay at home orders, ENDGBV created multilingual signs to be placed at each FJC, informing any clients that may have come for a walk-in that the locations were closed but they can call in remotely. Before quarantine, MIS equipped all staff with the ability to telework. For the FJCs, this included making sure phone calls could be directed to screeners who could use Cyracom to determine the language. ENDGBV has since continued to conduct hybrid services.

ENDGBV's Language Access Coordinator and Executive Director of FJC Programs and Operations have since begun creating an emergency plan to ensure that staff are better prepared. ENDGBV is exploring technical support for phones to be able to have messaging in multiple languages, and more. The LAC, Executive Director of FJC Programs and Operations, and the Acting Deputy Commissioner of Community Initiatives and External Affairs will meet in Spring '24 to map an emergency preparedness plan that we hope to have developed and completed by June 2025.

Materials the office will distribute will include:

1. Messaging of physical closure in the top 10 languages at each FJC
 - a. Using Tables 2-4 ENDGBV identify additional languages per each FJCs demographic
 - b. Emergency contact information will also be included Contact
2. NYC HOPE Flyer
 - a. This will be used for any longer closures
 - b. This flyer was created during the citywide shutdown for COVID-19. It leads the public to resources on NYC HOPE, our social media and includes contact information for emergencies

To ensure content and messaging regarding emergency preparedness continues to be accessible, the Language Access Coordinator reviews all public material to guarantee it is plain language and is visually accessible. The Language Access Coordinator is the primary contact and manager of plain language review and translations to make sure the process is consistent and efficient. The secondary contact, working directly with the Language Access Coordinator, is our Executive Director of FJC Programs and Operations. ENDGBV will continue working on the development and implementation of revised emergency preparedness plans that support staff in meeting the needs of LEP clients during an emergency.

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ENDGBV's Language Access Coordinator and Executive Director of FJC Programs and Operations have since begun creating an emergency plan to ensure that staff are better prepared.

VI. Resource Planning

A. Bi/multi-lingual Staff

ENDGBV staff and FJC onsite partner agency staff members provide meaningful language access through telephonic interpretation, the provision of services in an LEP client's non-English language, community outreach events, trainings when available, and quality assurance of written content. ENDGBV does not currently use selective certification to recruit language speakers; however, candidates with multilingual abilities are strongly encouraged to apply for positions. ENDGBV prioritizes language abilities in contracts for domestic and gender-based violence programs and services and other internal staffing procedures. Also continue to search for potential avenues for professional development including certification for interested staff.

Partner staff that are fluent in a language are permitted to provide direct service in the language. Program Coordinators and or trainers comfortable with leading trainings in a language other than English are also allowed to provide the training, with any written materials being professionally translated by Language Line. They are also permitted to conduct outreach in the language they speak. We do not use

staff as interpreters.

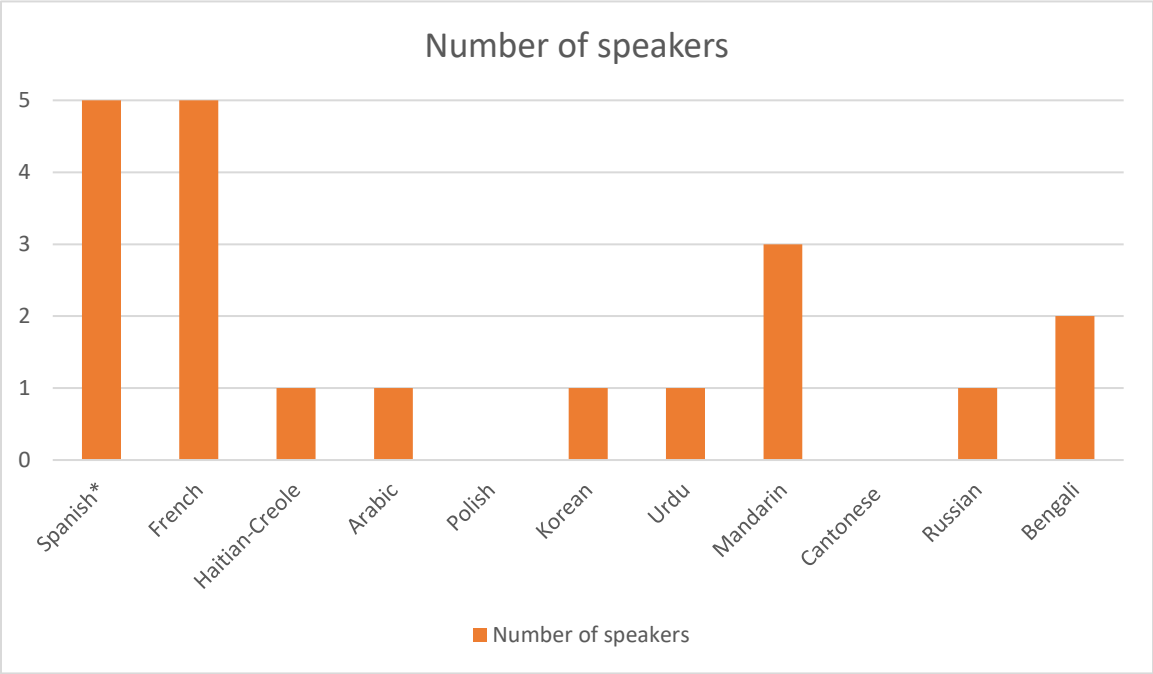


Chart 1: ENDGBV staff and culturally specific FJC onsite partner staff language capacity in correlation with top LEP languages in NYC (Collected May 2024)

*There are 130 Spanish speakers at ENDGBV and FJC onsite partner organizations.

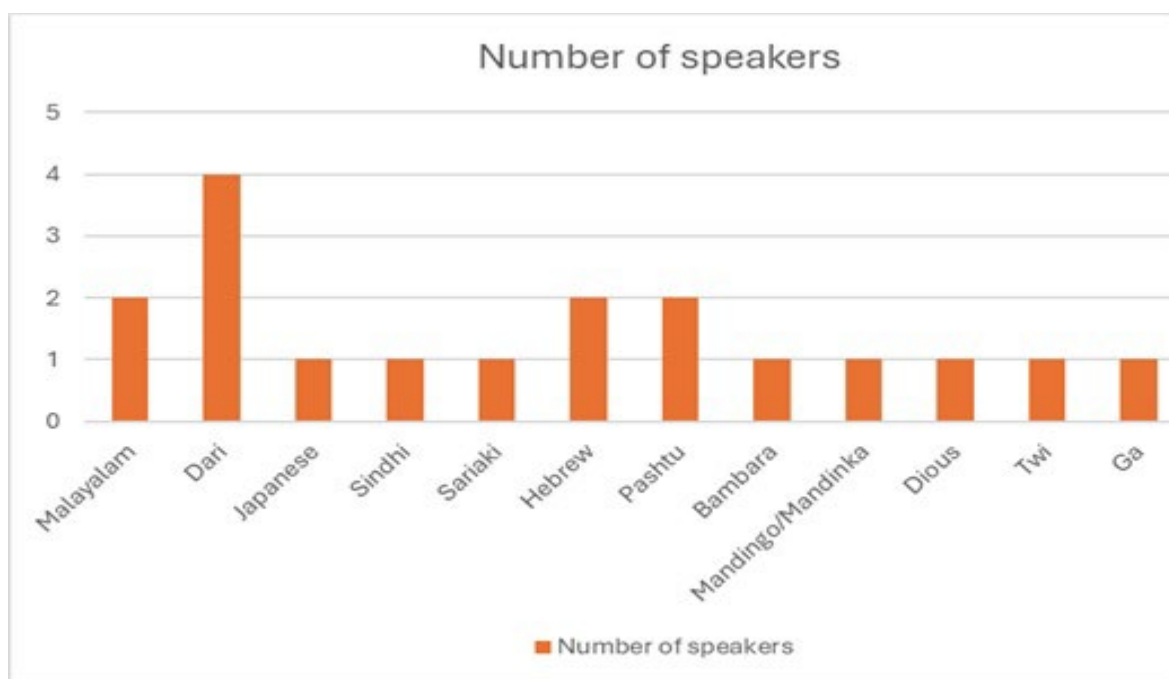


Chart 2: Additional languages spoken by ENDGBV staff and culturally specific FJC onsite partner staff. (Collected May 2024)

The

Language Access Coordinator, the Executive Director of FJC Programs and Operations, and Chief of Staff are working to develop a system to: (1) track numbers of bi-/multi-lingual staff; (2) identify, assess, and develop the language skills of qualified bi-/multi-lingual staff, as appropriate; (3) ensure fair and equitable HR practices for bi-/multi-lingual staff; and (4) identify methods to compensate survivors in their assistance and support with our language access work. The finalized system will be submitted for approval to the Acting Commissioner by March 2025.

B. Language Service Vendor Contracts

ENDGBV contracts with several vendors to ensure the accessibility of our services including language interpretation, CART, and document translation.

Vendor name	Procurement method	Purpose of the contract	Language(s) provided by the vendor	Period of contract	Total award amount of contract
CQ Fluency	MWBE Non-Competitive Small Purchase	CART	CART	2/26/2024 to 2/25/2025	25,000.00
Human Touch Translations	MWBE Non-Competitive Small Purchase	ASL	ASL	2/1/2024 to 1/31/2025	27,125.00
Cyacom/	Competitive Sealed Bid	Interpretation (telephonic)	Top 10 + over 300	6/3/2018 to	75,000.00

Voiance Language Services			additional languages	6/30/2024	
Accurate Communications	MWBE Non Competitive Small Purchase	Secondary OSI Services	250 Languages and Dialects	7/1/2022 to 6/30/2026	200,000.00
Language Line	Task Order	Written Translation	250+ Languages	6/3/2018 to 6/30/2025	14,778,522.00
Geneva Worldwide	Task Order	On-Site Interpretation Services	100+ Languages	7/1/2018 to 6/30/2025	3,037,600.00
Language Line	City Contract	Interpretation (telephonic)	Top 10 + over 300 additional languages	7/1/2024 to 6/30/2027 (yearly renewal)	\$78,000.00

C. Partnerships with Community Based Organizations

Community Based Organizations play a crucial role in ENDGBV's work, as contracted program providers in community, contracted onsite providers at the FJC's and in-kind FJC partners. ENDGBV requires language access and culturally relevant services in all contracts, including FJC contracts. At the FJC's, contracted providers are responsible for core services including case management, frontline/reception services, children's services, family law and immigration legal services Monday through Friday from 9am to 5pm. In contrast, in-kind partners are offered space at the FJC's at no cost so that they can maintain a regular presence, usually one or two days a week, to connect with survivors through the FJC's walk-in model and expand their reach. Though the CBOs are not specifically contracted to provide language services, they provide linguistically and culturally appropriate services, accessible across all five FJC's.

CBO name	Language(s) provided by the CBO
Arab American Family Support Center	Spanish, Malayalam, French, Arabic, Urdu, Hindi, Punjabi, Pashto, Sindhi, Sariaki
Womankind	Mandarin
Garden of Hope	Mandarin, Cantonese
Met Council	Hebrew, Spanish
Pillars of Peace	Pashto, Dari, Urdu, K
VIP	Spanish
Women for Afghan Women	Farsi, Dari
Sauti Yetu	Bambara, Mandingo/Mandinka, Dioula, French
Korean American FSC	Korean, Mandarin

Jewish Board of Family and Children's Services	French, Haitian-Creole
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Table 6: This table depicts the language capacity of the “on-site” culturally specific Community Based Organizations that provide services across the Family Justice Centers.

VII. Training

All ENDGBV staff and FJC partner staff receive language access training bi-annually by the Language Access Coordinator. FJC and FJC partner agency staff are given information on language access and instructions for using telephonic interpretation during their orientation to the FJC and included in their operations manual which was updated and distributed in Spring/Summer 2021. FJC trainings and manuals are given by FJC administration team on a rolling basis for new hires and or partner agency collaboration. Training on Language Access primarily focused on the delivery of services using telephonic interpretation when staff members do not speak the primary language spoken by the LEP individual, so that they can support survivors of domestic and gender-based violence.

Training Topics Include:

- Overview of Federal and State Laws
- Overview of Language Access history in NYC, including Executive Order 41 (2003) and Executive Order 120 (2008)
- Overview of Local Law 30 (2016)
- ENDGBV's document translation process
- ENDGBV's translation request process
- Information on telephonic interpretation, including how to offer and use the services
- Information on troubleshooting issues with effective interpretation for less commonly encountered dialects or languages
- Information on process to provide positive and negative feedback on interpretation services, interpreter conduct, or issues securing telephonic interpretation
- Information on in-person interpretation and how to make requests
- Language access guidelines for agency communications and materials
- Site or discipline-specific information, such as information on accessing telephonic interpretation in the field
- Event planning for language capacity and accessibility

Since 2020, ENDGBV saw an increase in document translation requests and updated the language access training to include a module on understanding the process of document translation. In 2023, the Language Access Coordinator began drafting short “how to” videos that will include relevant information from the training and provide a resource they can use as needed to guide them through language access processes and best practices. By creating video content that is self-paced and more accessible to staff, we hope to increase the entire office's understanding of accessibility for LEP individuals and people with disabilities. Examples of the “How to” videos can be seen in the chart below. The roll out will begin in

May 2024 and continue through the end of summer as the Language Access Coordinator continues to create content. The Language Access Coordinator will collaborate with leadership, specifically our Deputy Commissioner for Research and Evaluation to develop a plan for tracking completion of videos.

Training topic	Target staff	Training method & frequency	Trainer/Creator
<i>What topic will be covered in the training? Is the training a part of existing trainings (such as new hire orientation)?</i>	<i>Which internal and contracted staff will be trained?</i>	<i>What mode will the training be in? (self-paced virtual, in-person, etc.) How frequent will the training be provided?</i>	<i>Who will conduct the training/create the content.</i>
Tips for Plain Language and Accessible Doc Creation	All ENDGBV staff	Self-paced videos to be viewed as often as needed.	Language Access Coordinator
Accessible PowerPoint Presentations	All ENDGBV staff	Self-paced videos to be viewed as often as needed.	Language Access Coordinator
Creating Accessible Social Media Post	All ENDGBV staff	Self-paced videos to be viewed as often as needed.	Language Access Coordinator

VIII. Continuous Improvement Planning

A. Data Collection and Monitoring

1. Demographic and Language Data Collection

All ENDGBV programs collect information on clients' preferred language. ENDGBV conducts periodic audits of program data to ensure accurate and reliable collection. For example, Family Justice Center (FJC) administrative staff provide quarterly reports to contracted organizations that reflect the completeness of demographic information, which includes a client's primary and preferred language. In addition, ENDGBV has created an electronic form for individuals to submit complaints regarding interpretation and translation services. Specifically, complaints can be filed regarding telephone interpretation, event interpretation and public document translations.

2. Data in the Decision-Making Process

Client level language data collected by ENDGBV programs and language access complaint information are both utilized to determine compliance with language access requirements and identify additional steps that need to be taken to provide meaningful access to services and information for all LEP New Yorkers. An analysis of the language data collected by the FJCs is provided to the FJC leadership team on

an annual basis to monitor any changes in client language needs. While ENDGBV regularly translates all FJC documents into the 10 official languages of New York City, this analysis helps identify any additional document translation needs based on emerging needs. Additionally, ENDGBV routinely meets with contracted program staff to access program needs, including needs around language access, interpretation and translation.

In addition to service provision, ENDGBV has considered language access in our research activities. All surveys developed and implemented by ENDGBV are translated into the 10 official languages of New York City. Interpretation services are provided as needed in any focus group or interview conducted by the research team. ENDGBV often uses surveys, focus groups and interviews to obtain feedback on our programing, and providing options for interpretation and translation increases the breadth of clients who can provide feedback.

B. Language Access Complaints

The Language Access Coordinator is responsible for receiving, tracking, and resolving complaints. Currently, members of the public can submit language access complaints, questions and requests through the agency using the language access email address (accessendgbv@endgbv.nyc.gov), through 311, or by speaking with a member of the ENDGBV Administrative team at each FJC.

The majority of ENDGBV's complaints have been internal and in January of 2024, the Language Access Coordinator worked with the Deputy Commissioner for Research and Evaluation to launch an IRM to collect complaints for interpretation (telephonic, virtual, and in-person) and translation for easier tracking and data collection for feedback to contracted vendors.

The Language Access Coordinator met with FJC staff in April 2021 to develop procedures for better documentation and tracking of complaints, which resulted in the formal complaint tracker being created in 2023 and rolled out in 2024. This new process includes collecting interpreter numbers, time of event, and specific details of the incident. FJC staff have also been documenting longer wait times since late 2020 and early 2021. Once complaints are gathered, the Language Access Coordinator emails the information to the vendor monthly. We have not received any complaints via 311 since 2021.

ENDGBV is currently exploring how to make the IRM accessible to the public and hopes to have a public facing structure for complaints by 2025. For that to be possible, the Language Access Coordinator, the Deputy Commissioner for Research and Evaluation, the Acting Commissioner of External Affairs and Community Initiatives, and the Executive Director of FJC Programs and Operations need to develop a plan for the following:

- Posting multilingual signage at walk-in sites about language access complaint channel(s)
- Disseminating multilingual flyers that contain information about language access complaint channel(s)
- Delivering in-language presentations containing information about language access complaint channel(s)
- Posting multilingual information on relevant websites about the language access complaint channel(s) that are accessible to users with LEP.

XII. Goals and Actions Planning

ENDGBV continuously strives to ensure that our services and resources reduce barriers related to root causes like racism, sexism, xenophobia, ageism, and ableism. We work to address gaps in service and create new pathways to safety through program development, legislative and policy advocacy, research, training, community-based initiatives and engagement, and operation of the New York City Family Justice Centers. Due to the complex circumstances of gender-based violence, a holistic and multifaceted approach to services and systems is critical for a survivor or victim to work toward safety and stability during and after instances of violence or abuse.

Language Access Goal	Action Steps/Milestones	Stakeholders	Timeline
Create and distribute bite size learning videos on language access/ accessibility to ENDGBV Staff	Language Access Coordinator (LAC) creates outline for videos, records videos, and distributes as they are completed.	LAC	June 2024- Dec 2024
Survey ENDGBV Staff on the effectiveness/helpfulness of the videos for improvement and additional content ideas	<ul style="list-style-type: none"> • Meet with Deputy Commissioner for Research and Evaluation for action plan • Create survey • Distribute survey in accordance with the plan 	<ul style="list-style-type: none"> • LAC • Deputy Commissioner for Research and Evaluation • ENDGBV staff 	June 2024- June 2025
Develop workplan for multi-language media	<ul style="list-style-type: none"> • Review MOIA's guidelines on multi-language media • Meet with Acting Deputy Commissioner of Community Initiatives and External Affairs <ul style="list-style-type: none"> ○ Assess internal capacity ○ Discuss potential partnerships • Receive feedback and approval from Acting Commissioner 	<ul style="list-style-type: none"> • Acting Deputy Commissioner of Community Initiatives and External Affairs • LAC • Acting Commissioner 	Dec 2024
Develop workplan for language accessibility that supports public facing events	<ul style="list-style-type: none"> • Review MOIA's guidelines • Meet with Acting Deputy Commissioner of Community Initiatives and External Affairs 	<ul style="list-style-type: none"> • Acting Deputy Commissioner of Community Initiatives and External Affairs • LAC 	Dec 2024

	<ul style="list-style-type: none"> • Receive feedback and approval from Acting Commissioner 	<ul style="list-style-type: none"> • Acting Commissioner 	
Have a completed translated glossary that centers DV/GBV	<ul style="list-style-type: none"> • Receive MOIA's glossary as basis • Compare ENDGBV's current draft with MOIA's glossary • Have Acting Commissioner review and add language • LAC has additional language translated • Internal and partner staff review for quality assurance 	<ul style="list-style-type: none"> • LAC • Acting Deputy Commissioner of Community Initiatives and External Affairs • LAC • Acting Commissioner 	Dec 2024
Develop a system to track numbers of bi-/multi-lingual staff	<ul style="list-style-type: none"> • Review MOIA's guidelines • Meet with Chief of Staff, Executive Director of FJC Programs and Operations, and Deputy Commissioner for Research and Evaluation to discuss current structures and improvements for tracking 	<ul style="list-style-type: none"> • Chief of Staff, Executive Director of FJC Programs and Operations, and Deputy Commissioner for Research and Evaluation 	Jan 2025
Create protocol to identify, assess, and develop the language skills of qualified bi-/multi-lingual staff	<ul style="list-style-type: none"> • Review MOIA's guidelines • Meet with Chief of Staff and Deputy Commissioner for Research and Evaluation to discuss structures for assessment and protocol • Meet with Finance and Contracts for professional development budgeting 	<ul style="list-style-type: none"> • Chief of Staff, Executive Director of FJC Programs and Operations, and Deputy Commissioner for Research and Evaluation 	March 2025
Create protocols to ensure fair and equitable HR practices for bi-/multi-lingual staff,	<ul style="list-style-type: none"> • Review MOIA's guidelines • Include this lens when meeting with Chief of Staff for previously mentioned tracker and protocols 	<ul style="list-style-type: none"> • LAC • Chief of Staff 	March 2025
Develop emergency plan and protocols	<ul style="list-style-type: none"> • Review MOIA's emergency plan and protocols guidelines • Executive Director of FJC Programs and Operations and LAC will develop a draft emergency plan • FJC admin will review and provide feedback • Receive feedback from MOIA • Executive Director of FJC Programs and Operations and LAC will finalize and implement plan 	<ul style="list-style-type: none"> • Executive Director of FJC Programs and Operations • LAC • FJC admin • MOIA 	June 2025

Develop workplan for working with and compensating survivors to increase their assistance and support with our language access work.	<ul style="list-style-type: none"> • Review MOIA's guidelines working with community for language access support • Survey partner staff at FJCs for their current models and feedback on feasibility • Plan with fiscal for future budget 	<ul style="list-style-type: none"> • LAC • CBO partners • Budgets and Contracts team 	Dec 2025
Equip each FJC with a dual headset (for interpretation)	<ul style="list-style-type: none"> • Research where previous headsets were purchased • Review if this fits in existing contracts • Plan with fiscal for either contract adjustments or purchases 	<ul style="list-style-type: none"> • LAC • Budgets and Contracts team 	Jan 2026
Have a public facing complaint tracker for interpretation and translation	<ul style="list-style-type: none"> • Review MOIA's guidelines • Meet with Deputy Commissioner for Research and Evaluation to discuss tangible structure of tracker • Confirm with Acting Deputy Commissioner of Community Initiatives and External Affairs and • Executive Director of FJC Programs and Operations the feasibility of promotion of tracker • Release tracker 	<ul style="list-style-type: none"> • Deputy Commissioner for Research and Evaluation • Acting Deputy Commissioner of Community Initiatives and External Affairs • Executive Director of FJC Programs and Operations • LAC 	June 2026