

# Language Access Implementation Plan

Mayor's Office to End Domestic and  
Gender Based Violence

March 2021

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I. **Agency Name and Agency Language Access Coordinator**

**Agency name** **Mayor’s Office to End Domestic and Gender-Based Violence**

**(ENDGBV)**

**Name of the agency’s Language Access Coordinator (LAC) and all office titles held by this individual.** Sara Gonzalez, Policy Advisor

## II. Agency Mission and Background

### **Mission**

Established in 2001, the Mayor's Office to End Domestic and Gender Based Violence (ENDGBV, formerly known as the Mayor's Office to Combat Domestic Violence or OCDV), develops policies and programs, provides training and prevention education, conducts research and evaluations, performs community outreach, and operates the New York City Family Justice Centers. ENDGBV collaborates with City agencies and community stakeholders to ensure access to inclusive services for survivors of domestic and gender-based violence (GBV). GBV can include intimate partner and family violence, elder abuse, sexual assault, stalking, and human trafficking.

### **Our Teams**

#### **NYC Family Justice Centers**

The NYC Family Justice Centers (FJCs) provide free and confidential assistance for victims and survivors of 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. The FJCs are working remotely during COVID with plans to reopen as the city does. At any NYC FJC, survivors of gender-based violence and their children can get connected to organizations that provide case management, economic empowerment, counseling, and 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 service providers, and District Attorney's Offices are located on-site at every FJC to make it easier for survivors to get help.

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

#### **Community Outreach**

ENDGBV's Outreach Team engages New York City communities through a wide variety of public engagement and education efforts, including: conducting workshops and organizing 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 GBV.

## **Research and Evaluation**

Our Research and Evaluation Team 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 GBV. This team provides evaluation and data management support to other agencies with programs that assist survivors of GBV.

## **Policy and Training Institute**

The Policy and Training Institute ("the Institute") leads the Office's training, prevention, and policy work. The Institute, which is comprised of the Policy Team, the Training Team, and the NYC Healthy Relationship Training Academy, was created to enhance City agency and community-based organization (CBO) responses to GBV, identify key areas for policy change and development, and engage in primary prevention through work with young people throughout New York City.

### **Training Team**

The Training Team provides tailored trainings to City agencies and CBOs on topics across the spectrum of GBV, as well as providing technical assistance in the review and development of their policies and protocols.

### **NYC Healthy Relationship Training Academy**

established in 2005, the Academy provides educational and skill-building training workshops for youth, parents and caregivers, and organizations that provide services to young people about healthy relationships and teen dating violence.

### **Policy Team**

The Policy Team develops policies and programs to address systemic gaps for survivors of GBV, and leads the Office's equity and inclusion work, housing the Language Access Coordinator, Disability Service Facilitator, and LGBTQ Liaison, as well as chairing ENDGBV's Equity Committee.

## **III. Agency Language Access Policy and Goals**

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 NYC Family Justice Centers. 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 FJCs, including contracted and in-kind providers, have access to City-contracted language access services through ENDGBV. Signage informing LEP clients of their right to an interpreter and the right to file a complaint with a manager and/or via 311 are posted conspicuously in all FJC facilities. This signage, provided by the Mayor's Office of Immigrant Affairs (MOIA), provides information in New York City's ten designated citywide local law 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, procedures, and instructions for using telephonic interpretation during mandatory FJC staff onboarding orientation that introduces FJC policies and procedures to staff prior to their starting work at the FJCs. After this initial staff orientation, ENDGBV staff and FJC partner agency staff are required to receive annual language access training, described in further detail in Section 4 of this report.

Due to COVID-19, the FJCs began operating remotely in March 2020, providing critical services to survivors of GBV over the phone. Staff relied heavily on Voiance to help provide telephonic interpretation and translate voicemails from new and existing clients.

### **Accessibility of Interpretation**

At the NYC Family Justice Centers, operated by ENDGBV, 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 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 contracted or in-kind providers. Interpretation services are made available if and when an LEP or non-English primary language speaker requests, regardless of their ability to otherwise communicate in English.

## **Use of Children, Friends, and Family as Interpreters**

ENDGBV policies in place that strictly prohibit staff at the NYC Family Justice Centers from using minor children to act as interpreters during any client or community member engagement, except in exigent circumstances. Additionally, FJC staff and clients are strongly discouraged from the use of adult children, relatives, and friends of clients and community members 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, our general policy against, and the potential complications or concerns that may arise from the use of adult children, relatives, or friends as interpreters. Additionally, we advise clients that confidentiality or privilege may be jeopardized if an adult child, relative, or friend is present in a room. Clients who are deaf or hard-of-hearing and do not communicate through ASL may not be able to access interpretation services through ENDGBV's existing providers when walking into an FJC; in such instances, all efforts are made to engage such clients at this initial visit, including the potential use of friends and/or non-minor family members as interpreters. Except in exigent circumstances, ENDGBV strongly discourages the use of non-professional or non-certified interpreters.

## **Written Communications**

ENDGBV encourages and facilitates the use of plain language in all public-facing materials, including online content. All document translations must be completed by a certified translator, either through the City's contracted vendor, or through use of the Citywide Volunteer Language Bank (VLB) which is comprised of City staff who have been certified as having professional command of a specific language or languages. Translated documents must be reviewed for coherence, sensitivity to GBV, with content reviewed by multilingual office staff, partner agencies, or through the VLB before they are finalized.

## **IV. Agency Language Access Accomplishments and Progress on Goals from Previous LAIP**

### **Language Access Accomplishments 2018-2020**

#### **Translation**

- Completed translation of the office's most widely distributed documents after they were re-designed to reflect the office's expansion

o Intimate Partner Violence Brochure

o Stalking Brochure

o Family Violence Brochure

o Sexual Violence Brochure

o Human Trafficking Brochure

- Translated FJC Client Satisfaction Surveys
- Translated survey responses received from FJC Client Satisfaction Surveys
- Quality assured 9/10 FJC palm cards

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- Translated COVID-19 closure signs for the FJCs
  - Translated and distributed a multilingual flyer, with top ten languages for those who may need GBV help during COVID-19
  - Translated COVID-19 Relief Survey
  - Translated COVID-19 Impact Survey to be placed on website
  - Translated Consent Forms for an oral and written history research project
  - Translated Interview Prompt and Written submission forms for written history research project
  - Quality Assured 5/10 informational flyers for the FJCs

### **Interpretation**

- Administered staff survey to re-assess language capacity of ENDGBV staff and FJC on-site partners
- Consistently provided conference/training participants access to interpretation options as part of all event registration
- Hosted town halls on Zoom and provided Spanish interpretation

### **Plain Language:**

- Drafted document creation guide for internal use that incorporates plain language tips and accessibility awareness
- Reviewed each translated document for plain language
- Edited citywide curriculum to be accessible for parents and guardians

### **Training and Evaluation**

- Provided annual Language Access training to staff in all programs within ENDGBV



- Included written Language Access Policy in the updated FJC operations manual that is currently being finalized
- Surveyed FJC client regarding the services they received, including language access
- The Office completed over 33 trainings, workshops, and outreach events in other languages, including Spanish, Haitian Creole, Garifuna, Bangla, Arabic, and a few multilingual events

Updates to Goals from Previous LAIP

Goals from Previous LAIP	Updates
Translate second priority documents into LEP languages	Translation for second priority documents continues to be in progress; however, human translations of website and online content has been identified as a higher priority need for ENDGBV.
Review ENDGBV’s online resources for language accessibility	ENDGBV continues to explore how best to incorporate human-translated content on its websites.
Track languages spoken by LEP callers to FJCs	All FJC clients, including LEP callers, are assessed for language needs, with languages spoken tracked in the FJC screening application.
Operationalize language services feedback for FJC Clients	Created and administered an FJC client survey that includes feedback on language access in 2019-2020.
Enhance services for LEP clients at FJCs	Based on FJC client feedback survey, which included responses from LEP clients, no additional service enhancements are being explored at this time.
Prioritize language abilities in future internal staffing procedures and contracts for GBV programs and services	ENDGBV has prioritized language abilities for hiring in key positions, such as community outreach, adding multiple bi-lingual staff in 2019. The office also continues to work on identifying means to require or prioritize language abilities in future contracts.

Review ENDGBV’s Emergency Preparedness Plan for language accessibility	Reviewed completed plan and adjustments made in 2019.
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## V. LEP Population Assessment

Factor 1: the number or proportion of LEP persons in the eligible service population (demographic analysis, e.g., Census data)

**Total languages spoken at home other than English**

#	Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island
1	Spanish 49.2%	Spanish	Spanish	Spanish	Spanish	Spanish
2	Chinese* 12.9%	Yoruba, Twi, Igbo**	Chinese*	Chinese*	Chinese*	Chinese*
3	Russian 4.8%	French	Russian	French	Bengali	Russian
4	Bengali 3.1%	Bengali	Yiddish	Japanese	Korean	Arabic
5	Yiddish 2.6%	Arabic	Haitian	Russian	Russian	Italian
6	French 2.5%	Chinese*	Arabic	Yoruba, Twi, Igbo**	Tagalog***	Polish
7	Haitian 2.5%	Italian	French	Korean	Polish	Urdu
8	Yoruba, Twi, Igbo** 2.1%	Tagalog***	Urdu	Italian	Greek	Hebrew
9	Arabic 1.9%	Amharic*^	Hebrew	Hebrew	Punjabi	Tagalog***
10	Italian 1.6%	Haitian	Bengali	German	Haitian	Nepali^^
11	Korean 1.6%	Russian	Italian	Hindi	Hindi	Yoruba**
12	Polish 1.4%	Korean	Polish	Portuguese	Arabic	Malayalam^

\*Includes Mandarin, Cantonese

\*\* Includes other languages of Western Africa

\*\*\*Includes Filipino

^Includes Kannada, or other Dravidian languages

^^Includes Marathi, or other Indic languages

^^^Includes other Slavic languages

\*^Includes Somali, or other Afro-Asiatic languages

Sources: U.S. Census Bureau, 2018 American Community Survey Summary File

Population Division – New York City Department of City Planning (December 2019)

Table 1: This table depicts the total language spoken at home other than English.

**Total languages spoken at home other than English by those with LEP**

#	Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island
1	Spanish 48.5%	Spanish	Spanish	Spanish	Spanish	Spanish
2	Chinese* 18.9%	Yoruba, Twi, Igbo**	Chinese*	Chinese*	Chinese*	Chinese*
3	Russian 6.3%	Bengali	Russian	Japanese	Bengali	Russian
4	Bengali 3.5%	French	Yiddish	French	Korean	Italian
5	Haitian 2.1%	Arabic	Haitian	Russian	Russian	Polish
6	Korean 1.9%	Chinese*	Arabic	Korean	Polish	Arabic
7	Arabic 1.7%	Italian	Urdu	Bengali	Haitian	Nepali^^
8	Yiddish 1.7%	Haitian	Bengali	Haitian	Punjabi	Malayalam^
9	French 1.4%	Russian	Polish	Yoruba, Twi, Igbo**	Arabic	Urdu
10	Polish 1.4%	Korean	French	Hebrew	Hindi	Tagalog***
11	Urdu 1.1%	Tagalog***	Italian	Italian	Tagalog***	Ukrainian^^^
12	Yoruba, Twi, Igbo** 1.1%	Vietnamese	Ukrainian^^^	Portuguese	Greek	Korean

\*Includes Mandarin, Cantonese

\*\* Includes other languages of Western Africa

\*\*\*Includes Filipino

^Includes Kannada, or other Dravidian languages

^^Includes Marathi, or other Indic languages

^^^Includes other Slavic languages

Sources: U.S. Census Bureau, 2018 American Community Survey Summary File

Population Division – New York City Department of City Planning (December 2019)

Table 2: This table depicts the total language spoken at home other than English by those with LEP.

- **Factor 2: the frequency with which LEP individuals come into contact with the agency**

**Primary Language - New FJC Clients 2018-2021**

Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island
Spanish 70.8%	Spanish	Spanish	Spanish	Spanish	Spanish
Mandarin 6.6%	French	Russian	Mandarin	Mandarin	Arabic*
Russian 3.7%	Bengali	Mandarin	French	Bengali	Russian
Bengali 3.0%	Arabic*	Haitian Creole	Russian	Arabic*	Urdu
Arabic (All Dialects) 2.7%	Albanian**	Arabic*	Portuguese	Russian	Mandarin
French 1.5%	Wolof/Ouoloff	Bengali	Arabic*	Urdu	Polish
Urdu 1.3%	Urdu	Urdu	Japanese	Korean	French
Haitian Creole 0.9%	Haitian Creole	Cantonese	Cantonese	Hindi	Italian
Cantonese 0.8%	Portuguese	French	Bengali	Punjabi	Albanian**
Portuguese 0.6%	Mandingo	Hebrew	Polish	Portuguese	Cantonese
Korean 0.6%	Russian			Haitian Creole	

Percentages calculated based on total of 8,209 new clients from 2018-2021 who selected languages other than English as their primary language.

\*Includes all dialects

\*\*Gheg & Tosk

Table 3: This table depicts the Primary Language of New FJC Clients

Telephonic Usage Bronx and Brooklyn FJC						
FJC Total			Bronx		Brooklyn	
1	Spanish	371	Spanish	91	English	88
2	Mandarin	166	French	22	Russian	59
3	Bengali	99	Bengali	17	Mandarin	52
4	Russian	79	Arabic (All Dialects)	8	Cantonese	29
5	Arabic (All Dialects)	67	Urdu	5	Bengali	28
6	French	43	Wolof/Ouoloff	2	Arabic (All Dialects)	22
7	Cantonese	43	Albanian (Gheg & Tosk)	2	Haitian Creole	15
8	Urdu	32	Cantonese	2	Urdu	13
9	Haitian Creole	20	Hindi/Mandingo/Po lish/TWI	1	Uzbek	9

Table 4: This table depicts the telephonic usage in Bronx and Brooklyn and the total of FJC telephonic usage.

Telephonic Usage Manhattan, Queens, and Staten FJCs								
FJC Total			Manhattan		Queens		Staten Island	
1	Spanish	371	Spanish	56	Spanish	98	Spanish	72
2	Mandarin	166	English	30	English	76	Arabic (All Dialects)	16
3	Bengali	99	French	17	Bengali	56	Urdu	10
4	Russian	79	Cantonese	10	Arabic (All Dialects)	23	Russian	7
5	Arabic (All Dialects)	67	Arabic (All Dialects)	9	Punjabi	14	Mandarin	7
6	French	43	Bengali	5	Russian	10	Cantonese	4
7	Cantonese	43	Russian	5	Nepali	10	Bengali	3
8	Urdu	32	Japanese	4	Korean	7	French	2
9	Haitian Creole	20	Portuguese/Punjabi /Hindi	3	Hindi/Urdu	7	Sinhalese/Tamil (Sri Lankan & Indian)	2

Table 5: This table depicts the telephonic usage in Manhattan, Queens, and Staten Island and the total of FJC telephonic usage.

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

Due to the often-complex circumstances of GBV, 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 gender-based violence, raising awareness of critical resources for survivors, and addressing barriers faced when help seeking. In order 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.

Training, events, and other efforts directed primarily at service providers, while important, are generally considered less critically essential for language access at this time.

#### Factor 4: the resources available to the agency and the costs of providing various types of language services

##### Available Resources

##### NYC Family Justice Centers and Community Outreach

###### FJCs

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

- Access to telephonic interpretation provided by Voiance, in over 240 languages.
- Dual-handset telephones available in reception areas for telephonic interpretation in open spaces.
- Speaker telephones for telephonic interpretation in private or enclosed office spaces.
- Multilingual “I speak” signs prominently displayed at every FJC.

###### Community Outreach

ENDGBV Outreach Team staff have:

- Access to telephonic interpretation provided by a City-contracted provider, in over 240 languages.
- Multilingual and diverse staff and access to other multilingual staff from City agency and community-based partner organizations.
- 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

**Cost of Providing Language Services**

ENDGBV utilized \$221,050 from 2018-2020 in interpretation services. The office’s previous LAIP did not differentiate telephonic and in person/virtual ASL interpretation, therefore the following chart shows total spent for 2018-2019. The office has since begun separating Telephonic and ASL cost.

<b>Fiscal Year</b>	<b>Total Cost</b>
2018	106,941
2019	66, 979

Table 5: This table reflects overall interpretation cost for FY18 and FY19.

<b>FY20</b>			
<b>Borough</b>	<b>Telephonic Interpretation</b>	<b>ASL (in-person) Interpretation</b>	<b>Total</b>
Bronx	\$ 7,142	\$ 2,493	\$ 9,635
Brooklyn	\$ 11,123	\$ 2,104	\$ 13,226
Manhattan	\$ 3,756	\$ 2,892	\$ 6,647
Queens	\$ 14,768	\$ 134	\$ 14,902
Staten Island	\$ 2,720	\$ -	\$ 2,720
<b>Total</b>	<b>\$ 39,508</b>	<b>\$ 7,622</b>	<b>\$ 47,130</b>

Table 6: This table reflects telephonic and ASL interpretation cost per borough and the total amount.

**VI. Provision of Language Access Services**

**Language Access in General Agency Services**

ENDGBV staff interaction with the public includes in-person service delivery, outreach activities, trainings, and written and telephonic correspondence. Telephonic interpretation is available via a City-contracted provider in over 240 languages. Agency 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 administrative staff member. ENDGBV does not currently use selective certification to recruit language speakers; however, candidates with multilingual abilities are strongly encouraged to apply for positions. ENDGBV aims to identify means to prioritize language abilities in future contracts for gender-based violence programs and services and other internal staffing procedures.

## Translations

The vendor used for translated documents is Language Line. The Language Access Coordinator, currently Sara Gonzales, oversees the translation process of all office materials, which includes quality assurance. Quality Assurance follows three tracks: 1<sup>st</sup> utilizing internal staff with language capacity as content experts, 2<sup>nd</sup> utilizing partner agency staff with language capacity, and 3<sup>rd</sup> utilizing the City's VLB for languages the office does not have access to.

ENDGBV prioritizes primary documents for translations over secondary documents. Previously, primary documents were prioritized in the order they were received, but because of the emergency translations needed during COVID-19, the office is now improving the prioritization process. The Language Access Coordinator has created an IRM to track translation requests and a memo for all staff that provides a detailed description of the translation process, from plain language to quality assurance. In addition to documents, ENDGBV is also working on translation of digital content.

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 City's 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.

## Interpretation Services

### *In-Person Interpretation*

ENDGBV has multilingual and diverse staff throughout the office, as well as through provider staff at the FJCs. For FJC clients and community members who require in-person interpretation in a language that is not provided by staff, FJC staff can arrange for in-person interpretation for languages spoken throughout the City through contracted City vendors, including for American Sign Language. In-person interpretation must be requested in advance of the appointment, in order for accommodations to be arranged; as such, they may not be immediately available to clients who walk in without an appointment at the FJC. In-person interpretation services can be provided at the FJCs on subsequent visits when the ENDGBV administrative team at the FJC is advised of the need. All FJC staff are trained to make in-person interpretation requests.

In CY19, ENDGBV surveyed ENDGBV staff and FJC on-site staff to get an updated assessment for staff language capacity. The Office is now exploring how to connect bilingual or multilingual staff who may want to become certified as interpreters and translators, with existing opportunities

throughout the City, to help ensure the consistency and quality of in-person interpretation available throughout the Office’s programs.

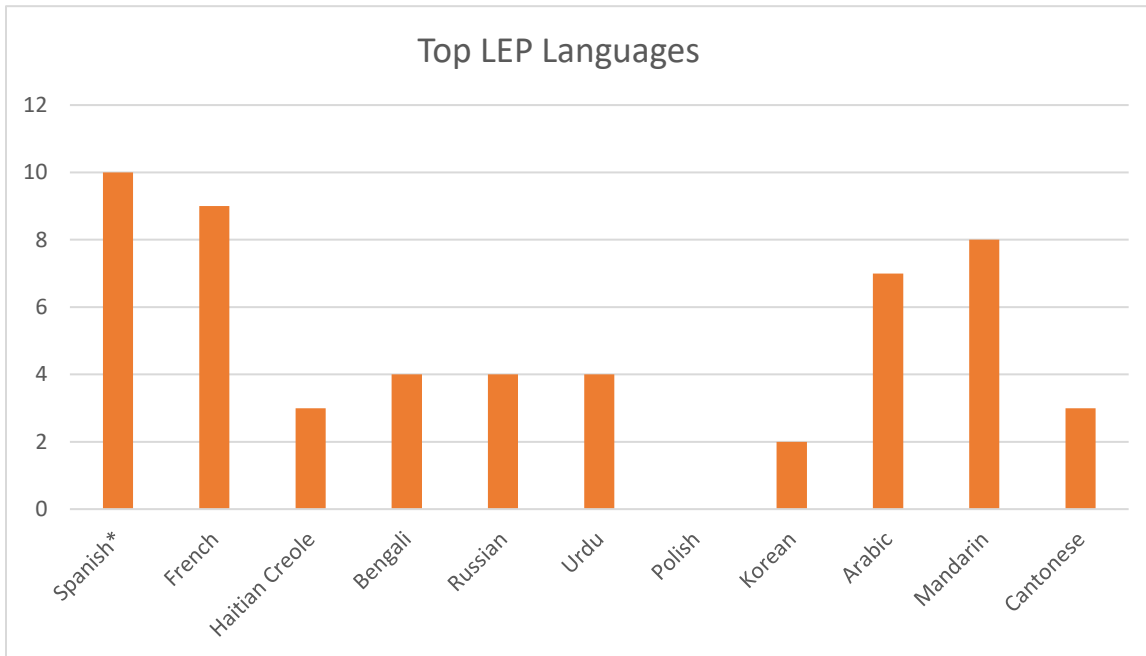


Chart 1: ENDGBV staff and FJC on-site staff language capacity in correlation with top LEP languages in NYC

\*ENDGBV has 84 Spanish speakers.

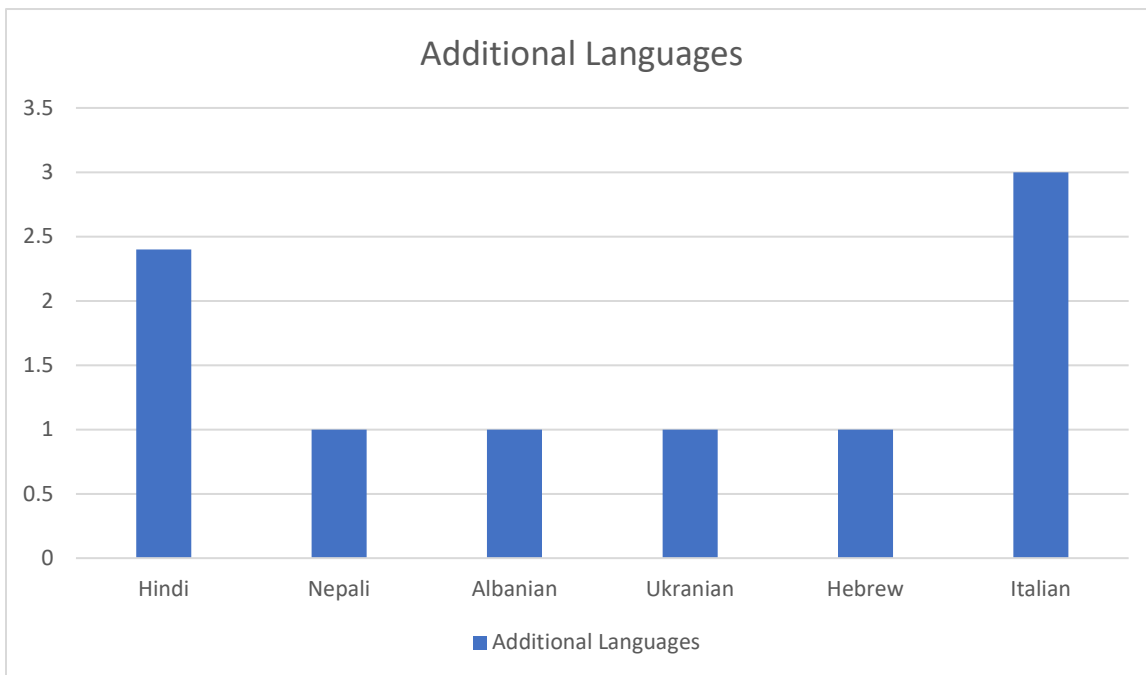




Chart 2: Additional languages spoken by ENDGBV staff and FJC on-site staff

### *Telephonic Interpretation*

FJC staff have access to telephonic interpretation via a City-contracted provider, Voiance, 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 otherwise generally communicate in English. FJC staff have access to speaker telephones for telephonic interpretation in private or enclosed office spaces. The reception areas at each FJC are also equipped with dual-handset telephones that enable telephonic interpretation in public spaces.

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.

Currently, complaints are emailed to the Language Access Coordinator. From 2018-2020, the office had a low number of complaints and received no complaints via 311. In late 2020 and early 2021, FJC staff began documenting longer wait times which caused clients to hang up, and a difficult time with high quality Russian translators.

The Language Access Coordinator met with FJC staff in April 2021 to develop procedures for better documentation and tracking of complaints, how to better promote and encourage feedback from clients, and the internal structure of how to centralize the tracking of complaints.

## **Outreach**

### *In-Person Interactions*

ENDGBV Outreach Community Liaisons conduct outreach in English, Spanish, French, Bengali, Arabic, and Haitian Creole, as well as working with partners who are often proficient speakers of languages other than English. ENDGBV identifies LEP communities for outreach based on rates of LEP FJC client service engagement and through collaboration with community-based organizations and stakeholders.

When Community Liaisons encounter a member of the public speaking a non-English language, all efforts are made to connect the person with an outreach worker speaking their language. If an outreach worker who is fluent or sufficiently proficient in that language is not available, all outreach workers can access telephonic interpretation in over 240 languages through a City-contracted provider. Additionally, outreach workers have informational materials available in

multiple languages: including English, Spanish, Russian, Chinese, Arabic, and Bengali, Haitian Creole, Korean, Urdu, French, and Polish.

#### *Over-the-Phone Interactions*

Since teleworking due to COVID-19, the Outreach Team has conducted workshops in Bengali and Arabic, and continues to offer services in Spanish, Haitian-Creole, French, and English. If an outreach staff member connects via telephone with a speaker of a non-English language that they do not speak, the outreach staff member conferences in a telephonic interpreter service.

#### **Language Access in Agency Communications**

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 event materials, along with instructions for requesting interpretation. When ENDGBV receives a request for ASL or other interpretation for partner and community-based organization staff trainings, ENDGBV administrative staff reaches out to a contracted provider to schedule interpretation in advance of the training. For online communications, the Office's website and the NYC HOPE Resource Directory both use the Google Translate plug-in to provide access for LEP individuals, per standards set forth by the Department of Information Technology and Telecommunications (DoITT). Materials that the Office has already translated into the City's designated languages are available on our website as PDFs.

In 2020, ENDGBV worked with DoITT to configure human translations of critical information on its website and the NYC HOPE Resource Directory to maintain consistency with above mentioned. ENDGBV will continue to explore additional paths and funding to enhance the human translation of online content throughout 2021. While the Office does not typically post content in multiple languages on social media, in 2020, the outreach team created PSAs in Spanish, Arabic, Bengali, Haitian-Creole, and French. ENDGBV will explore how to create more multiple language communications.

#### **Plain Language**

ENDGBV sent multiple staff to DCAS's 1.5 training on plain language in 2017, with the goal of empowering these staff to train other units in the office on the principles of plain language. However, due to staff transition among group members throughout 2018, only one member of the original group was available by the fall; subsequently, plain language trainings were not conducted. The single remaining staff member who completed DCAS' plain language training continues to review newly developed communications, including documents, flyers, brochures, and online content for plain language; however, it would be sustainable to have a group do this

work. ENDGBV was unable to fulfill its plan to send additional staff to plain language training because DCAS was no longer offering the training in CY19.

ENDGBV created an accessibility guide for document creation that included plain language tips and formatting. Staff members were not cleared by DCAS for the Plain Language Training in June 2020, though our Language Access Coordinator is working with the providers to offer an all-staff training in 2021.

## Policies and Procedures

In CY19, ENDGBV created an accessibility guide for document creation that included plain language tips and formatting. In CY20, an IRM to receive and track translation requests was created, along with a memo documenting the translation process for requests, the time frame for translations, and our quality assurance procedure.

## Notification of Free Interpretation Signage

All FJCs have prominently displayed signage for visitors in multiple languages (including the ten City-designated languages) that indicate the availability of interpretation, and how complaints can be made. Additionally, each FJC reception desk is staffed with staff trained to offer and use telephonic interpretation, to ensure effective and meaningful communication with FJC visitors. Each FJC makes available “I speak” cards for clients to use as they engage with other systems or organizations, to indicate that they require assistance in a non-English language.

## Language Beyond the Top 10

ENDGBV’s City-contracted provider, Voiance, provides telephonic interpretation for over 240 languages. The newly created translation IRM includes options for 25 languages.

## Emergency Preparedness

ENDGBV and its programs continue operations during an emergency 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 primary 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.

As of CY19, the FJCs have multiple languages currently recorded for emergency responses:

- **Manhattan Family Justice Center:** English, Mandarin, French, Spanish

- **Staten Island Family Justice Center:** English, Spanish
- **Queens Family Justice Center:** Spanish, Mandarin, Korean, Bengali, Hindi
- **Bronx Family Justice Center:** Spanish, French, Italian, Albanian, English
- **Brooklyn Family Justice Center:** English, Spanish

At the start of the COVID-19 pandemic and as New York State issued stay-at-home orders, ENDGBV created multilingual signs to be displayed prominently at each FJC to inform any clients attempting to make a walk-in visit that the location was closed but available for phone calls. Before stay-at-home orders, MIS had equipped staff with the technology to telework. For the FJCs, this included making sure that phone calls could be directed to screeners with access to Voiance to determine the language needed to communicate with a client.

ENDGBV is continuing to develop and implement revised emergency preparedness plans to support our staff in meeting the needs of LEP clients during an emergency.

### Licenses, Permits, and Registrations

N/A

## VII. Training

FJC staff are given information on language access and instructions for using telephonic interpretation during their mandatory staff orientation conducted prior to their working at an FJC. In addition, all ENDGBV and FJC partner agency staff receive language access training annually each spring, during mandatory attendance staff meetings. Training on Language Access primarily focuses 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' 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)
- Document translation process
- Translation request process
- Telephonic interpretation, including how to offer and use the services
- How to troubleshoot issues of securing effective interpretation for less commonly encountered dialects or languages

- How to provide positive and negative feedback on interpretation services, interpreter conduct, and issues securing telephonic interpretation
- 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

In 2019, ENDGBV continued our annual language access trainings across the five NYC FJCs, as well as the administrative office. In addition to these trainings, ENDGBV is developing a written policy on language access with site-specific information that will be available to all staff and included in our newly updated FJC operations manual that will be distributed in Summer 2021.

ENDGBV was not able to offer annual language access trainings in 2020 due to staff capacity and an officewide focus on needs specific to COVID-19. The training will now be offered again in 2021, with newly added details about the process of document translation, due to the sharp increase for document translation requests in 2020.

## VIII. Record Keeping and Evaluation

ENDGBV reports and tracks our compliance with language access requirements, as well as additional steps taken to provide meaningful access to services and information to all LEP New Yorkers. The Language Access Coordinator (LAC) is responsible for retrieving data from each unit in order to review and report on that data in annual Language Access reports. The LAC is also responsible for receiving and resolving language access complaints and conducting quarterly reviews of language access data to identify trends or potential areas for improvement. In 2019, the LAC received feedback that Voiance did not have interpretation available in two indigenous languages, one from Africa and one from South America, which were needed at the Brooklyn and Queens FJC, respectively. In each instance the LAC directed FJC staff to call the respective country's embassy. Recently, staff have reported extreme delays in service and an inability of the Voiance automated system to hear the language being requested.

Provision of language services is primarily tracked by the FJC screening application and telephonic interpretation usage across all programs. At the FJC, each client meets with a screener who records information in the FJC screening application, including client's primary language and interpretation needs during their first visit. The FJC screening application uses a list of 161 languages and provides an option of "other." If a client indicates a language not listed, the screener selects the "other" option and records the language spoken by the client in an open

field. The limited information recorded in the FJC screening application is available to other providers, dependent upon clients' individual confidentiality and privacy requests.

In 2020, ENDGBV launched a microgrant program specific to providing emergency funds for clients impacted by COVID-19. Surveys administered for the program were translated into the top ten languages, and any follow up evaluations will also be translated.

## IX. Resources Analysis and Planning

ENDGBV staff and FJC on-site partner agency staff members provide meaningful language access through telephonic interpretation and the provision of services in an LEP client's non-English language. ENDGBV does not currently use selective certification to recruit bilingual and multilingual language speakers; however, candidates with multilingual abilities are strongly encouraged to apply for positions.

Meetings with each unit within ENDGBV to develop specific plans for each department convened in April 2021. The Language Access Coordinator will begin a Language Access Convening with members from each team to have regular check-ins and monitor progress toward language access goals. ENDGBV continues to work on identifying means to require or prioritize language abilities in future contracts for gender-based violence programs and services and other internal staffing procedures.

## X. Outreach and Public Awareness of Language Access Services

ENDGBV provides notification of language access services via outreach materials, including flyers for events, FJC materials such as palm cards and flyers, and online materials. In addition, staff can conduct outreach in multiple languages for specific communities, and each FJC has on-site signage with notifications of client rights to interpretation. When the office plans a public service announcement campaign, language access is considered in the provision of materials in languages other than English and language needs are assessed in registrations.

The Outreach team plans to continue to develop multilingual social media posts and direct outreach to community. ENDGBV is working to provide support in enhancing the language capacities of ENDGBV's current staff.

## XI. Language Access Complaints

Members of the public can submit language access complaints, questions and requests through the office using the language access email address ([LanguageAccess@endgbv.nyc.gov](mailto:LanguageAccess@endgbv.nyc.gov)), through 311, or by speaking with a member of the ENDGBV Administrative team at an FJC.

Signage informing LEP clients of the right to an interpreter, as well as the right to file a complaint, is posted in conspicuous locations throughout FJC facilities. This signage, provided by MOIA, provides information in New York City's ten designated languages – Spanish, Chinese, Russian, Haitian Creole, Bengali, Korean, Arabic, Urdu, French, and Polish. ENDGBV's website also includes information on making accessibility-related inquiries and submitting language access complaints.

ENDGBV will explore the best way to provide the information in the additional 15 languages added to the IRM, as well as providing the information at online and at in-person events that utilize interpretation.

## XII. Implementation Plan Logistics

<b>Language Access Goal</b>	<b>Milestones</b>	<b>Responsible Staff</b>	<b>Deadline</b>
Convene ENDGBV Language Access meetings	*Identify participants *Identify group structure	Language Access Coordinator	April- May 2021
All staff plain language training	*Review and update plain language training	Language Access Coordinator	June 2021
Develop complaint tracking procedure	*Review existing complaint tracking procedure to identify strengths and gaps *Meet with LAC to understand best practices for complaint procedures	Language Access Coordinator + FJC Admin	September 2021
Create glossary to translate into top ten languages	*Identify content for the glossary *Obtain input from units throughout the Office	Language Access Coordinator and Language Access Team	December 2021
Update automated responses for FJCs in English and top ten languages	*Identify staff or partner agency staff who can speak top ten languages	FJC Admin + Language Access Coordinator	December 2021
Have Emergency Voicemails in top ten languages	*Identify staff or partner agency staff who can speak top ten languages	FJC Admin + Language Access Coordinator	January 2022



<b>Language Access Goal</b>	<b>Milestones</b>	<b>Responsible Staff</b>	<b>Deadline</b>
Translate Glossary		Language Access Coordinator	January 2022
Quality Assure Glossary		Language Access Coordinator	February 2022
Conduct Oral and Written History Research in top ten languages	*Identify research participants	Director of Research and Evaluation	July 2022
Have human translated material on NYC HOPE	*Consolidate materials in need of translation *Discuss budget implications *Develop translation plan that includes prioritized content	Communications Manager	September 2022
Translate necessary Oral and Written History responses		Language Access Coordinator	December 2022