

Department for the Aging (DFTA) Language Access Policy and Plan May 2021

I. Agency Name and Agency Language Access Coordinator

Agency name	Department for the Aging (DFTA)
Name of the agency’s Language Access Coordinator (LAC) and all office titles held by this individual.	Sandy March, Senior Analyst
Link to the agency’s Language Access Implementation Plan (LAIP) posted on the agency’s website.	https://www1.nyc.gov/site/dfta/about/language-access-plan.page

II. DFTA Mission and Background

Agency Mission

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

Background

The New York City Department for the Aging (DFTA or the Department) is the lead Mayoral agency addressing public policy and service issues for the aging. It is also the largest agency in the federal network of Area Agencies on Aging (AAA) in the United States. Established to represent and address the needs of elderly residents of New York City, the Department administers and promotes the development and provision of accessible services for older persons and serves as an advocate on legislative and policy issues. DFTA partners with hundreds of community-based organizations to provide a range of services to older throughout the City. In Fiscal Year 2020, DFTA served over 240,000 older New York City residents through its in-house programs and contracted providers.

Services Offered by the Agency

DFTA-Funded Core Community Services

- **Older Adult Centers:** DFTA currently funds over 240 older adult centers throughout the five boroughs. They provide congregate meals and an environment where older adults can participate in a variety of recreational, health promotional and cultural activities, as well as receive information on and assistance with benefits.
- **Case Management:** Case management services help older persons with functional impairments gain access to appropriate services, benefits and entitlements needed to age safely at home and maintain their quality of life. Case Management is the gatekeeper for

DFTA funded in-home services such as home delivered meals, home care, friendly visiting, and the Bill Payer program.

- **Home Delivered Meals (HDM):** The Home Delivered Meals program provides meals each weekday to hungry and homebound older adults, and its public/private partnership with Citymeals on Wheels supports weekend, holiday, and emergency meals for these recipients. All home delivered meals meet prescribed dietary guidelines.
- **Home care:** The Home Care program is designed for low-income seniors 60 years of age and older who have unmet needs in activities of daily living and do not qualify for Medicaid or other ongoing insurance-funded home care. The goal of this program is to maintain seniors safely at home and prevent or delay the placement of frail elderly individuals into more expensive Medicaid-funded nursing homes.
- **Transportation:** The Department provides transportation for older adults through contracted non-profit organizations. These providers transport frail older New Yorkers who have no access to, or cannot use public transportation, for the purpose of attending senior centers and essential medical and social service appointments.
- **Caregiver Services:** The Caregiver program supports caregivers of older New Yorkers by providing direct referrals and support through community-based providers. These providers support caregivers by providing information on long term care topics and resources, assisting with accessing benefits and entitlements, offering individual counseling, support groups, and care-related training, linking caregivers with in-home, congregate, and overnight respite care, and offering supplemental support services.
- **Naturally Occurring Retirement Communities (NORCs):** DFTA oversees the City-funded Naturally Occurring Retirement Community Supportive Service Programs (NORC SSPs), which provides social work services, assistance with health care management, wellness activities, and other social and educational programs. There are currently 28 NORC SSP contracts funded by DFTA.
- **Elder Abuse Prevention and Intervention Services:** DFTA contracts with five community-based elder abuse organizations, one in each borough, to provide: direct services to victims of elder abuse; prevention activities that include trainings and outreach; long-term case management services to clients, many of whom present highly complex cases; and assistance to victims of elder abuse by helping them secure orders of protection, providing long-term counseling, accompanying victims to court, examining powers of attorney and other legal documents, working with police to place victims on high-propensity lists, and working closely with District Attorneys to aid in the prosecution of cases.
- **Social Adult Day Services (SADS):** Social Adult Day is a supervised program for cognitively impaired and/or physically frail older adults, with program components designed to reduce isolation and maximize individual capabilities through socialization, structured activities, and nutritious meals. These services, combined with transportation and access to case managers, provide respite to caregivers of these participants. DFTA oversees nine discretionary Social Adult Day Service programs.

- **Friendly Visiting:** Made possible by ThriveNYC, the Friendly Visiting program matches seniors with dedicated volunteers who commit to making weekly home visits to seniors in their own homes. Friendly Visiting often helps reduce loneliness and feelings of isolation and supports seniors in maintaining community connections and re-engaging in social activities.
- **NY Connects:** NY Connects is a statewide ‘no wrong door’ program of information and referral for individuals across the lifespan in need of long-term services and supports. NY Connects is unique in its charge to assist older adults, persons of all ages with disabilities, and individuals with mental health and substance abuse issues. The goal of the program is to ensure that individuals receive assistance in such a way that they are seamlessly connected with services that help them with often multifaceted, complex situations. NY Connects oversees five contracted borough-based community organizations throughout New York City.

DFTA Direct Service Programs

- **Aging Connect:** In February 2020 DFTA launched Aging Connect, a contact center that connects older New Yorkers, caregivers, and professionals to age-inclusive programs, resources, and opportunities. In close partnership with NY Connects and 311, Aging Connect aims to eliminate confusion and provide information and direct referrals to services. Aging Connect’s multi-lingual Aging Specialists are trained to connect callers to direct services provided by DFTA providers, community partners and city agencies.
- **Assigned Counsel Project:** The Assigned counsel Project (ACP) is a joint collaborative effort between the NYC Department for the Aging, NYC Human Resources Administration (HRA), Office of the Criminal Justice (OCJ) and the New York State Civil Court Access to Justice Program. The goal of the program is to prevent evictions of persons over the age 60. Potential clients for the program are older adults who are at risk of being evicted from their homes, and who have an active case on the New York City Housing Court calendar.
- **Bill Payer Program:** The Bill Payer Program provides one-on-one free assistance to older persons who need help with checkbook maintenance and bill paying. The program works to assist low-income seniors in paying their bills on time, while protecting them from financial exploitation. It helps financially vulnerable seniors remain in the community with the assurance that their monthly financial obligations have been met.
- **Elderly Crime Victims Resource Center:** The Elderly Crime Victims Resource Center provides direct services to crime and elder abuse victims, and training to groups that work with older adults on how to identify signs and provide intervention. The ECVRC and its community partners – including the Mayor’s Office to Combat Domestic Violence and the Family Justice Centers of Brooklyn, Queens, Manhattan, Bronx, and Staten Island – provide crisis intervention, counseling, advocacy, information and assistance, limited emergency financial assistance, and legal services referrals.
- **Foster Grandparent Program (FGP):** The Foster Grandparent Program is a federally funded senior volunteer program sponsored by DFTA, whose primary focus is literacy support and

mentoring to children with special and exceptional needs. Low-income older adults are placed in a variety of venues, such as schools, hospitals, family courts, Head Start programs and day care centers. Foster Grandparents assist teachers, medical staff, and social workers in engaging children in literacy activities, as well as in providing nurturing and care for pediatric patients.

- **Grandparent Resource Center (GRC):** The Grandparent Resource Center provides supportive caregiver services to older adults raising their grandchildren. As a member of the Mayor’s Action Plan (MAP) for Neighborhood Safety in 15 NYCHA developments, the GRC collaborates with other City agencies and community leaders to seek and engage the grandparents/elderly caregivers of children under 18 years old who reside within designated NYCHA developments. In addition, GRC staff provides intergenerational programming, food-insecurity resources, assistance with elder abuse and other senior issues at the MAP sites.
- **Health Insurance Information Counseling and Assistance (HIICAP):** The Health Insurance Information Counseling and Assistance Program (HIICAP) helps seniors navigate the complexities of Medicare and Medicaid. HIICAP publishes “A Complete Guide to Health Insurance Coverage for Older New Yorkers” annually. The book is translated into Spanish, Chinese and Russian, and is available in print and online. HIICAP also oversees the Fully Integrated Duals Advantage program (FIDA), a demonstration program jointly administered by the federal Centers for Medicare & Medicaid Services (CMS) and the New York State Department of Health (NYSDOH). It is designed to integrate care for New Yorkers who have both Medicare and Medicaid.
- **Nutrition Counseling:** DFTA’s Nutrition Unit includes dietitians and nutritionists who serve as experts for the Department’s community partners and for seniors living in the community who attend congregate meal programs or receive home delivered meals. They ensure that seniors receive nutritious meals that meet all city, state, and federal guidelines. They also provide extensive technical assistance on meal planning, recipe development, food safety, and City Agency Food Standards.
- **Senior Community Service Employment Program (SCSEP):** The Senior Employment Unit operates the Title V Senior Community Service Employment Program (SCSEP), which provides training and employment opportunities for adults 55 and older, including job search skills workshops, career advisement, job fairs, and computer technology and customer service training. The SCSEP program provides ongoing support to the participants upon finding employment, such as retention and career advancement support and non-related support through partnerships with other city agencies.

For more information about DFTA’s services, please visit our website at: www.nyc.gov/aging.

III. DFTA Language Access Policy and Goal

In keeping with the Department's mission to serve all older New Yorkers, DFTA is committed to ensuring that limited English is not an obstacle for older individuals. It is the policy of DFTA to ensure that

individuals with Limited English Proficiency have equal and meaningful access to all its services. Individuals are of Limited English Proficiency (LEP) when they have limited ability to speak, read, write, or understand English.

DFTA's language access goal is to facilitate aging services access and utilization by older LEP individuals. The goal will be met through the following objectives:

- Informing staff and providers about local, state, and federal language access mandates, including Local Law 30;
- Ensuring staff, providers and the public are aware of and knowledgeable about DFTA's Language Access Policy;
- Providing front line and outreach staff with training on the provision of language access services;
- Requiring providers contracted with the Department to have plans and policies in place to address the needs of LEP individuals as per the Department's General Standards of Operation;
- Monitoring contract agencies' compliance with language access requirements;
- Translating commonly distributed documents in the 10 designated citywide languages, and any additional languages spoken among the top ten spoken by older New Yorkers;
- Ensuring that other documents and announcements, identified by DFTA programmatic units, are translated into the top 10 languages of Older New Yorkers and/or the City's 10 designated citywide languages.

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

Language Access Goals	Update
Identify a Language Access Coordinator.	DFTA appointed a Language Access Coordinator in FY 2019.
Develop a tracking system to track complaints and document language translation services provided.	The Correspondence Tracking System (CTS), which officially launched in CY2019, allows tracking of complaints, including any language access related complaints.
Develop a complaint form and post on the internet.	The Department has updated the website with an option for the public to register complaints, concerns, and requests for language access services.
Provide Plain Language Training for staff	Several staff, including the Language Access coordinator, have completed Plain Language training courses.
Develop a protocol for staff requests for formal translation of DFTA documents.	The Language Access Coordinator has been established as the point person for facilitating formal translation of documents.
Incorporate Language Access into the Continuity of Operations Plan (COOP)	DFTA's language access plan is currently included in agency's Continuity of Operations Plan (COOP).
Ensure that multilingual staffers are tapped to table at disaster service assistance centers and multilingual materials provided.	DFTA will seek bilingual volunteers among staff to table at disaster assistance centers.
Develop a system to monitor whether language services are being provided by contracted providers.	Language access compliance is included in the monitoring tool that is used to assess the performance of contracted providers.
Ensure that all programs and in-house Units have Language Cards posted.	Various multilingual signages have been posted on all floors throughout the agency.
Review the Clarity of Materials to be Translated.	Some documents are reviewed for Plain Language and clarity prior to publication.
Identify and Prioritize the Most Commonly Distributed Documents for translation in the ten designated citywide languages.	Various documents have been identified for translation, including the agency brochure which was updated in FY 2020.
Convene the first bi-annual multi-Bureau Language Access Meetings.	The LAC will coordinate workgroups to implement the Plan.

V. LEP Population Assessment (Application of the US Department of Justice Four Factor Analysis)

Factor 1: The number and proportion of LEP older individuals in New York City

Top ten languages among older New Yorkers who speak English “less than very well”:

Languages other than English spoken at home	# 60+	% 60+	# 60+ LEP	% 60+ LEP
Spanish	367,899	20.90%	235,875	13.40%
Chinese	131,662	7.50%	119,993	6.80%
Russian	67,010	3.80%	58,585	3.30%
Korean	17,837	1.00%	16,370	0.90%
Italian	28,205	1.60%	15,726	0.90%
Haitian	28,257	1.60%	13,721	0.80%
Polish	14,549	0.80%	11,846	0.70%
Bengali	14,620	0.80%	10,340	0.60%
Greek	14,456	0.80%	8,525	0.50%
Arabic	9,818	0.60%	5,976	0.30%
Total Population (60+)	1,759,783	-	560,457	31.80%

Source: ACS 1-Year Estimates-Public Use Microdata Sample 2019

The Primary Languages of DFTA's Clients Served During Fiscal 2020

During Fiscal 2020, DFTA served over 240,000 older New Yorkers and their caregivers; of those:

- 70,720 or 29% speak a primary language other than English; and,
- 31,215 or 44% cannot speak, read, or understand English.

The language breakdown of all DFTA’s clients who cannot speak, read, or understand English (LEP) is as follows:

Language	Number of Clients	Percentage of Clients
Spanish	15,697	50%
Chinese (includes Cantonese, Mandarin, and other dialects)	8,781	28%
Russian	4,129	13%
Korean	1,152	4%
Polish	537	2%
Italian	172	1%
Greek	184	1%
Arabic	56	0.20%

Language	Number of Clients	Percentage of Clients
Albanian	42	0.10%
Ukrainian	36	0.10%
Portuguese	26	0.10%
Haitian Creole	29	0.10%
French Creole	26	0.10%
Romanian	20	0.10%
Japanese	20	0.10%
Urdu	21	0.10%
Creole English	20	0.10%
Bengali Bangla	19	0.10%
Hindi	16	0.10%
Other	232	1%

Source: Senior Tracking and Reporting System (STARS)

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

The table below shows the number and of, and frequency with which LEP individuals came into contact with DFTA – funded core programs during FY2020.

Limited English Proficiency Clients						
	LEP		Non-LEP		Total	
	Clients	Percent	Clients	Percent	Clients	Percent
Contact with DFTA Funded programs:						
More than 10 times:	19,167	50%	91,292	45%	110,459	46%
Less than 10 times:	18,897	50%	112,519	55%	131,416	54%
Total	38,064	100%	203,811	100%	241,875	100%
Average Contacts	56 times		44 times		46 times	

Source: Senior Tracking and Reporting System (STARS)

In FY2020 DFTA provided more than 1,500 over the phone interpretation in more than 30 languages through its Language Line Solutions. The table below shows the languages for which translation was provided and the number of calls for each.

Language	Number of Calls
Spanish	805
Chinese (includes Mandarin, Cantonese, and Toishanese, and Shanghainese)	319
Russian	199
Korean	31
Greek	26

Language	Number of Calls
Bengali	25
Polish	17
Hindi	14
Arabic	12
Italian	8
Haitian Creole	8
Farsi	7
Urdu	6
Japanese	5
Albanian	4
Thai	3
French	3
Tagalog	2
Punjabi	2
Other (<i>includes Portuguese, Hungarian, Sudanese Arabic, Romanian, Yiddish, Vietnamese, Akan, Fuzhou, and Serbian</i>)	10

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

The services DFTA provides help older adults remain safe and secure, and age well in their communities. The lack of, or delay in access to, translation or interpretation services can have serious implications for LEP older adults and their caregivers trying to access these services. It has been particularly critical during the pandemic to ensure that prompt, accurate information is provided to older adults in the language they speak.

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

DFTA’s current resources include Language Line Solutions, which provides interpretation services in over 240 languages, and DFTA’s multilingual staff who can competently assist LEP individuals in various languages other than English. In FY20, DFTA spent \$36,868.69 on translation and interpretation services. Based on the analysis above, DFTA will ensure that its direct public services are provided in Italian and Greek, which are among the top ten languages spoken by older New Yorkers, but not included in the citywide designated languages. DFTA will also provide any additional languages based on any targeting efforts.

VI. Provision of Language Access Services

Translation Services

DFTA uses several vendors for translations, including Human Touch and Continental Translation. Bilingual staff sometimes translates short documents and messages. The LAC works with staff to facilitate translation requests and arranges for secondary review of translated documents. Should the translations be less than accurate, they are returned to the vendor to be corrected. Vendors are assessed, when possible, on the quality of previous work done. The LAC also works with program staff

as well as the Press and Public information Office to identify the most commonly distributed documents and have them translated. Staff are made aware of the agency's translation resources and how to access them through trainings and information provided by their leadership.

How the agency identifies, prioritizes, and translates the “most commonly distributed” (MCD) documents and ensures that new materials that are created are translated, as necessary.

Some criteria used to identify MCDs include whether they are regularly used for outreach to the public, their shelf life (evergreen documents), and how often they are requested by the public. Materials that contain important and necessary information, like COVID guidance, are prioritized for translation. Some translated materials were distributed at events like the annual public hearings, while others like ad campaigns were distributed through ethnic media outlets, on the radio, bus shelters, through public service announcements, and Link NYC Kiosks. Staff are instructed to follow the protocol for the provision of Language Access Services outlined in the LAIP on the agency's internet. The Plan will also be placed on Geras, DFTA's internal staff website.

Interpretation Services

DFTA utilizes Language Line Solutions, which provides interpretation in over 240 languages for telephonic interpretation. Interpretation services are provided to any LEP individual who contacts the agency by phone or in person. All direct services staff can access Language Line. For in-person contacts, staff are required to use language identification cards to identify an individual's language. DFTA has several staff who are proficient in a range of different languages. The agency utilizes these bilingual staff to communicate with clients when the information can be easily and quickly be conveyed to the client in his or her primary language. DFTA modified the data field for entering client's special communication needs in its client tracking database, which is utilized by internal programs and contracted providers, to make it a required field. This makes it mandatory for users to see or capture whether clients are LEP, as well as the language they speak, and communicate with them in their primary language or utilize Language Line. DFTA's in-house program staff uses interpretation services to provide LEP Older New Yorkers with a wide range of services. For example, Aging Specialists in DFTA's Aging Connect contact center regularly utilize Language Line to provide LEP callers with information on age-inclusive programs, resources, and opportunities. Staff are required to provide an interpreter if the client requests one, regardless of whether a bilingual staff is available. Meka Nurse, DFTA's Senior Director of Aging Connect, manages Language Line, and provides access to staff who need to utilize the service.

Language Access in Agency Communication

Outreach staff will ensure that materials are translated in the predominant languages of the communities they plan to engage at outreach and public information events. The agency also aims to engage LEP communities by providing notices and running campaigns in ethnic media outlets, on the radio, on bus shelters, etc.

Plain language

Several key staff responsible for developing documents for dissemination to the public have completed Plain Language training. Documents targeted for translation are written in plain language to ensure that the information can easily be understood by individuals with a range of literacy levels. Documents are reviewed for readability and clarity and edited where necessary prior to translation and publication.

Policies and Procedures

All DFTA staff interacting with potential clients and/or service information seekers are required to take the following steps in providing service to walk-in individuals:

- When a walk-in customer appears to be LEP, staff must attempt to verbally ascertain the primary language spoken by the customer.
- If verbal communication is unsuccessful, staff must use a Language Identification Card to facilitate communication. Language Identification Cards are available in all reception areas and units.
- When individuals visiting DFTA's offices need language services, they are to be assigned to a bilingual staff person who speaks his/her language if available.
- If an appropriate bilingual worker is not immediately available, Language Line Solutions should be accessed.
- Callers to direct service units or individuals contacted by phone will be asked their preferred language for communication if they are deemed LEP, and interpretation services will be provided.

Primary language is tracked in DFTA's client tracking system (STARS), as well as in DFTA's Correspondence Tracking System (CTS). STARS captures primary language as well as individuals' ability to speak, read, or write English.

Notification of Free Interpretation Signage

Multilingual signage about the right to, and availability of free language services are posted on each floor throughout the agency. DFTA's contracted providers are also required to post signage at their location about free language services and are assessed on their compliance with this requirement in their annual evaluations. "Point to your Language" and "I Speak Cards" are also available to assist LEP individuals with identifying their language.

Languages beyond the Top Ten

DFTA is committed to making its services available to all older adults regardless of the language they speak. Staff are required to ensure that LEP individuals receive timely service in their primary language. DFTA will translate documents in the two additional languages (Italian and Greek) that are among the top ten languages spoken by LEP older New Yorkers, and any additional languages that are spoken by the predominant members of target communities. DFTA utilizes Language Line Solutions to provide over the phone interpretation to individuals who speak languages beyond the 12 languages.

Addressing Language Access Needs in the Agency's Emergency Preparedness and Response

DFTA's Office of Emergency Preparedness and Response (OEPR) coordinates public and internal messaging for hazards and emergencies. The agency's Language Access Plan is included in the Continuity of Operations Plan (COOP) and in the Agency's Emergency Plan. Clients' primary language and special communications needs (ability to speak, read, or write English) are captured on the Emergency Preparedness form in each client's profile in DFTA's client tracking system (STARS). DFTA will continue to communicate information about hazards and emergencies to clients in their primary language, either through direct phone calls or through robocalls. During the pandemic, DFTA sent out robocalls in several languages with information about meal delivery and vaccination. DFTA's contracted providers are required to have a written emergency plan, which the agency will monitor to ensure that it includes language access. DFTA will also maintain a list of bilingual staff who opt to volunteer in an

emergency. The LAC will work with the emergency preparedness liaison to facilitate translation of materials and any other language access activities, as appropriate.

VII. Training

DFTA's Staff Development Unit will conduct trainings for frontline staff and managers on language access laws, policies, and procedures. Trainings will be offered quarterly to accommodate new staff, as well as any current staff who would like a refresher. Staff who complete the training will receive a certificate of completion. The Staff Development Unit will maintain a record of all staff who have been trained.

Staff from following areas will be trained at least annually:

- Aging Connect
- HIICAP
- Senior Employment
- Foster Grandparent
- Grandparent Resource Center
- Bill Payer
- Elderly Crime Victims Resource Center
- Nutrition Counseling
- Government Affairs Outreach
- Press and Public Information
- Other (this includes other staff identified by the leadership)

Training topics will include the following:

- Language Access legal mandates
- Working with interpreters
- When to use bilingual staff and when to use language services providers
- When and how to use telephonic interpretation
- When and how to use in-person interpretation
- When and how to request translation services
- How to identify the primary language of a person with LEP
- How to track the individual's language
- How to track whether and how language services are provided to the individual
- How to provide customer service to individuals with LEP

Additional, relevant trainings will be provided to staff as resources allow.

VIII. Record Keeping and Evaluation

DFTA will continue to track the languages spoken by clients in the Senior Tracking and Reporting System (STARS) and with individuals seeking information, assistance, and or making a complaint in the Correspondence Tracking System (CTS). The CTS is an internal database that captures correspondence submitted through DFTA's website, 311 online, as well from the Mayor's Office. The Correspondence Manager will handle all language access correspondence that come into the CTS, and the LAC will be able to develop reports as needed. STARS is utilized by DFTA's more than 400 contracted providers, as

well as in-house direct service programs to gather and analyze key information about its clients and programs. Data from these systems, as well as demographic analysis will help DFTA identify, target and more effectively and equitably serve LEP clients. DFTA will develop key metrics to determine whether its services are sufficiently and effectively meeting the needs of LEP older adults. Indicators will include the unduplicated number of LEP individuals served; the time it takes to respond to language access complaints; and the number of documents translated and disseminated. DFTA will also propose the addition of Client Primary Language as an indicator to its EO45 data. Additionally, the LAC will keep abreast of demographic changes to determine if there are any emerging LEP populations and ensure they have access to DFTA's services. Satisfaction surveys will include feedback on language access service. All contracted providers are required to have plans and policies in place to address the needs of LEP individuals and compliance is monitored as a part of their assessment. The LAC will monitor the Plan for compliance with LL30 and apprise the leadership of any non-compliance, as well as make recommendations for strengthening the agency's language access service delivery.

IX. Resource Analysis and Planning

Implementation of the Plan, coordination, and management of translation services, and ensuring compliance with Local Law 30 will be provided by the following DFTA staff:

The Senior Director of the Office of Management Analysis and Planning (OMAP), and the Director of Planning, Policy and Analysis (PPAU) will supervise the Language Access Coordinator whose responsibilities include:

- Updating the annual Language Access Plan and the Language Access Implementation Plan (LAIP)
- Monitoring implementation of the LAIP
- Liaising with the Mayor's Office of Immigrant Affairs
- Coordinating language access workgroups
- Facilitating translation requests
- Preparing reports on language access

Director of Press and Public Information:

- Identifying commonly distributed documents.
- Ensuring that DFTA's public announcements and key publications are accessible to LEP individuals.

Director of Staff Development:

- Develop and conduct language access and cultural competency trainings for direct service staff, supervisors, and program officers who are responsible for monitoring contracted providers.

DFTA General Counsel:

- Ensure legal compliance and provide legal guidance when necessary.

The agency has a Purchase Order for Language Line Solutions.

DFTA outlines the provision of language access services as a requirement in its Requests for Proposals and in contracts with service providers. Language access requirements is also written in Standards of Operations.

As per the Department's General Standards of Operation (Standard 2 Compliance 2.1):

Compliance 2.1. The program is linguistically and culturally competent.

- *The program has a language access plan that includes these provisions:*
 - *The program will provide on-demand language assistance free of charge to persons with limited English proficiency (LEP). At minimum, the program will have a telephonic interpretation service contract or similar community arrangement with a language interpretation services provider to assist LEP individuals.*
 - *The program will inform persons with limited English proficiency of the availability of free language assistance at its location. Notice will be in writing designed to be understood by LEP individuals.*
 - *The program will train staff that have contact with the public in the timely and appropriate use of these and other language services.*

X. Outreach and Public Awareness

The department will keep the updated LAIP posted on its website where all stakeholders (internal staff, providers, clients, public, etc.) can access it. Information about the availability of free language assistance will be included in outreach materials and communication to the public. In notices about its public hearings, DFTA will include information about how to request interpretation or translation of materials in their primary language.

XI. Language Access Complaints

Members of the public can submit language access complaints, questions, and requests to the agency by contacting 311 by phone or online or through DFTA's website at:

<https://www1.nyc.gov/site/dfta/about/email-the-commissioner.page>. The Correspondence Manager will be responsible for documenting all language access complaints and ensuring that complaints are addressed promptly and within the Service Level Agreement timeframe.

The public can also contact the Language Access Coordinator directly with any questions at <https://www1.nyc.gov/site/dfta/about/language-access-plan.page>.

XII. Implementation Plan Logistics

The Language Access Coordinator will work with managers, program staff and the Staff Development Unit to implement the Plan by:

- Ensuring any new LL30 mandates, guidance, or other information are conveyed to leadership and other appropriate staff;
- Participating in trainings conducted by the Staff Development Unit as needed; and
- Coordinating language access workgroups

Language Access Goals	Milestones	Responsible Staff	Deadline
Include Language Access data in Executive Order 45 reporting.	Language Access indicators are added to reporting metrics.	Chief Diversity Officer and EO45 representative.	March 31, 2021
Conduct language access trainings for all in-house frontline staff and managers.	All frontline managers and staff are trained. New staff will be trained, and continuing staff will receive a refresher annually.	HR's Staff Development Unit.	June 30, 2021
Coordinate language access workgroups.	Staff are assigned responsibility for assisting with implementation of the LAIP.	Language Access Coordinator (LAC).	June 30, 2021
Translate most commonly distributed documents.	Commonly distributed documents are identified, prioritized, and translated.	LAC, program staff, and Office of Press and Public Information.	September 30, 2021
Develop a Plain Language Review process.	Plain Language review workgroup is developed.	Language Access Coordinator.	September 30, 2021
Identify ways to improve the accessibility of DFTA's website beyond using Google Translate.	Multilingual links that connect users to pages with content are on the homepage.	Press and Public Information.	September 30, 2021
Post most commonly distributed documents in the 10 designated citywide languages on the agency's website.	Most commonly distributed documents are on the agency's website.	Press and Public Information.	September 30, 2021
Provide in-person interpretation at events based on the population being served.	In-person interpretation service is provided at public hearings and other large-scale community events.	Event organizer.	September 30, 2021