

**New York City Department of Health and Mental Hygiene  
Local Law 73 Implementation Plan Update  
March 31, 2006**

**Introduction**

The Department of Health & Mental Hygiene (DOHMH) published an implementation plan in October, 2004 to ensure compliance with Local Law 73 of 2003 and to demonstrate DOHMH's commitment to providing limited English proficient (LEP) individuals and communities with full access to on-going services.

DOHMH convened a workgroup to address access to language assistance services with representatives from Bureaus that provide on-going patient care services in their program's Article 28 clinics. The bureaus include, Bureau of Tuberculosis Control, Bureau of Sexually Transmitted Diseases Prevention & Control, Bureau of Immunization, and Oral Health Programs & Policy. Also included in the workgroup were the Offices of Policy & Planning, Cross-Cultural Communications and Clinical Quality Management.

The following outlines what has been completed, including dates and descriptions of additional steps taken beyond the plan.

**1. Identification of Primary Language:**

- Language Identification Cards were distributed to all 29 clinics (4 Immunization clinics, 5 Oral Health clinics, 10 STD clinics and 10 TB clinics) between February 13, 2006 to March 1, 2006 with a supervisory (train the trainer) training on card usage in eliciting and identifying the primary language of a LEP individual.
- The name and contact information of the central Language Assistance Coordinator was also distributed to all 29 clinics at this time.

**2. Notice Regarding Free Language Assistance**

The Office of Clinical Quality Management visited all 29 clinics from February 13, 2006 to March 1, 2006 to ensure the presence or distribution of the following:

- A letter-size sign for front line staff and poster-size sign for the waiting room area. The sign states, "IF YOU NEED AN INTERPRETER, PLEASE POINT TO YOUR LANGUAGE" in 40 languages and dialects.
- A letter-size card stating "One Moment Please" in 18 different languages.
- Language assistance protocols and guidelines for answering calls and providing notification of language assistance services as part of the Language Access Toolkit (detail of Toolkit content to follow).

### **3. Language Assistance Services**

- All 29 clinics received a Language Access Toolkit, and each clinic manager received training on its content. Information included a language identification card, tools for telephone interpretation, bilingual staff tips, and Cross-Cultural Communication (CCC) contact information.
- Description of the Toolkit:  
The Language Access Toolkit is a collection of information and resources intended to help Health Department staff communicate more effectively with New Yorkers who speak little or no English. This initial version focuses on telephone interpretation, a service that, when used properly, can help front line staff work with diverse customers.

Additional information includes instructions for American Sign Language services; bilingual staff working as interpreters; and the DOHMH memo on Executive Orders 34 and 41 regarding confidentiality of information on immigrant status. Over time, more resources will be added to the Toolkit, in conjunction with the agency's implementation of Local Law 73 as well as other efforts to improve language access.

- Guidelines were developed and distributed to all 29 clinics for answering calls and providing notification for availability as part of the language Toolkit distribution and training.
- Staff from Cross-Cultural Communications continues to provide additional instruction on telephone interpretation and language access to clinic managers and staff at in-service and on-site trainings.
- All 29 clinics have access to telephone interpretation.
- All clinical sites have Bureau-specific and mandated documents translated in multiple languages for the population that they serve.
- CCC is currently working on improving access to health-related materials in multiple languages. The unit works with programs across the agency to expand the availability of DOHMH information in other languages. Press releases are now regularly translated into Spanish and Chinese, and on occasion, into other languages, to facilitate dissemination through New York's ethnic and community press. The agency's most prominent publication, the monthly Health Bulletin, is now translated into Spanish, Chinese, and Russian. A couple of recent bulletins have been released in eight languages: Arabic, Bengali, Chinese, Haitian, Korean, Russian, Spanish, and Urdu.

**TABLE 1: Breakdown of Numbers and Percentages of Translated Documents by Language as Surveyed by the Office of CCC**

<b>Languages</b>	<b>Number (%)</b>
Spanish	197 (39%)
Chinese	123 (24.4%)
Russian	35 (6.9%)
Haitian	32 (6.3%)
Korean	30 (5.9%)
Arabic	23 (4.6%)
Bengali	23 (4.6%)
French	8 (1.6%)
Urdu	8 (1.6%)
Polish	6 (1.2%)
Hindi	5 (1.0%)
Yiddish	5 (1.0%)
Farsi	3 (0.6%)
Italian	3 (0.6%)
Serbo-Croatian	2 (0.4%)
Greek	1 (0.4%)
Hebrew	1 (0.2%)
Vietnamese	1 (0.2%)

- On improving multilingual access to DOHMH’s public website: DOHMH continues to add translated materials to its website and is working on improving multilingual navigation. The Online Editorial unit has constructed mockups of mirror homepages for Spanish and Chinese, and is assembling a directory for non-English materials. Online is also seeking grant funding to support these efforts.

**4. Quality Assurance Measures**

- DOHMH currently monitors quality assurance through complaint management and is working on developing and implementing an on-going medical record review and listening resources such as mystery shopping surveys.
- On establishing periodic language review panels:

The language review panels were originally conceived as additional quality control measure for the translation process existing at the time (2004). As the Cross-Cultural Communications (CCC) unit is in the process of procuring vendors with better quality assurance, as well as revisiting its own quality control activities, we are removing this step from our implementation plan. However, in August 2005, CCC convened a group of bilingual Spanish staff to provide feedback and quality assurance

on language and cultural appropriateness of developed translated materials.

- CCC plays a major role in the translation of agency-wide documents. Translations are provided by a professional language service vendor. Independent professional translators then review and edit the translations. CCC works with approximately 15 independent translators, covering most of the commonly requested languages. For other languages, CCC works with members of its Volunteer Language Bank (internal bilingual staff) to assist with the review process.
- The agency is procuring translation, on-site interpretation, and telephone interpretation language services.

## **5. Training**

- Supervisory training was completed as of March 1, 2006. Additional training including front line staff for the Bureau of Sexually Transmitted Diseases Prevention & Control staff was conducted on March 3, 2006.
- All covered Bureaus elicit the primary language of individuals served as part of the Bureau's policy and procedures.

## **6. Record Keeping**

- Records of primary language are maintained for all Article 28 clinic sites for every individual with the exception of Oral Health:
  - STD clinics via Electronic Medical Record
  - TB clinics via Electronic Medical Record and data entry/billing services vendor
  - Immunization via data entry/billing services vendor
- Oral Health will modify its patient intake process to include recording and tracking of language data.

## **7. Coordination**

DOHMH has designated a Language Assistance Coordinator.

## 8. Implementation Updates & Annual Reports

See the included tables detailing article 28 clinics patient counts by language. For 2005, data on primary language and language assistance needs was not available for Oral Health.

### STD Clinics Patient Language Information for 2005

<b>Language Assistance Needed</b>		
<b>Language</b>	<b># of Visits</b>	<b>% of total</b>
None	60,843	86.0%
Spanish	1,742	2.5%
French	34	0.0%
Creole	3	0.0%
Russian	12	0.0%
Arabic	5	0.0%
Chinese	35	0.0%
Not answered	8,085	11.4%
<b>Total</b>	<b>70,759</b>	<b>100%</b>
<b>Primary Language Spoken</b>		
<b>Language</b>	<b># of Visits</b>	<b>% of total</b>
English	50,560	71.5%
Spanish	6,985	9.9%
Portugese	213	0.3%
French	136	0.2%
Chinese	132	0.2%
Russian	80	0.1%
Japanese	71	0.1%
Creole	48	0.1%
Arabic	42	0.1%
Other	498	0.7%
Not answered	11,994	17.0%
<b>Total</b>	<b>70,759</b>	<b>100%</b>

### TB Unduplicated LEP Patient Counts by Language

Language	Patient Count of LEP Seen by Primary Language
English	22,938
Spanish	8,243
Unknown	2,016
Chinese	1,266
French	482
Russian	239
Creoles and Pidgins	208
Other	1,387
<b>TOTAL</b>	<b>36,779</b>

### Immunization Unduplicated Patient Counts by Language

Language	# of Unduplicated Patients	
	Clinics	Outreach
English	45,751	23,102
Spanish	7,777	4,272
Chinese	2,543	2,930
Korean	843	1,460
Haitian	686	137
Russian	962	807
Arabic	268	55
Other	3,233	821
Unknown	7,595	4,535
<b>Total</b>	<b>69,658</b>	<b>38,119</b>
<b>Grand Total</b>	<b>107,777</b>	