

Language Access Implementation Plan

New York City Department of Veterans' Services (DVS)
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NYC Department of Veterans' Services (DVS)
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I. Agency name and agency language access coordinator

Agency Name: The New York City Department of Veterans' Services

Agency Language Access Coordinator: Curtis Dorval, Digital Communications Manager

II. Agency mission and background

The New York City Department of Veterans' Services (DVS) was created in April 2016, making DVS the first standalone City agency in the country dedicated to serving Veterans and their families.

Since that time, the agency has moved rapidly to connect, mobilize, and empower New York City's Veteran community in order to foster purpose-driven lives for New York City Service Members – past and present – in addition to their caregivers, survivors, and families through:

- Community engagement, amplifying life strategies for successful transition and renewed service.
- Targeted advocacy, championing legislative and policy actions at the local, states, and national level.
- Compassionate service, ensuring coordinated access to benefits, services, and resources.

We believe that veterans are civic assets whose strength and demonstrated commitment to public service will help NYC thrive. DVS seeks to achieve its mission through the following Lines of Action:

1. Housing & Support Services:

DVS works with partners to leverage and expand resources needed to provide subsidized housing and create innovative systems to help veterans navigate the NYC rental market. This includes:

- Veteran Peer Coordinator (VPC) program: DVS staff as one-on-one advocates for each homeless veteran navigating their housing search.
- After Care: ensuring recently housed veterans and their landlords get support for successful transitions into housing.
- Housing Coordination Center: a one-stop housing placement service to affordable housing owners and property managers.

2. VA Claims:

Over 6,500 Veterans living in New York City are eligible for but do not receive their Veteran Affairs benefits. The VA Claims team can assist and file a claim on behalf of eligible Veterans seeking an earned benefit such as education, survivorship, or disability.

3. Food Outreach:

DVS has been working hard to help combat food insecurity among NYC veterans and military

families. Through food distribution efforts in the Bronx and Brooklyn it packs thousands of meals for Veterans. This is only one component of its efforts to feed food-insecure Veterans.

4. Employment, Entrepreneurship, Education, Engagement:

DVS is dedicated to helping veterans broaden their employment opportunities to find fulfilling and sustainable jobs or create their own business, help veterans as they work to further their education, engage them with no matter their discharge status, and attend and host events to meet with as many members of the community as possible.

To address this, DVS has launched satellite offices, expanding our physical office presence throughout the city, enabling veterans and their families to meet one-on-one with VA-credentialed Outreach Specialists in each of the five boroughs. DVS has satellite offices in all five boroughs: Brooklyn, the Bronx, Manhattan, Queens, and Staten Island. Veterans and their families can now get one-on-one assistance in their home communities.

III. Agency Language Access Policy and Goals

DVS's Language Access Goal is to deliver information for a multilingual audience.

Our agency aims to:

Provide language access services in designated citywide languages

- A. Develop and implement a language access implementation plan
- B. Provide as-needed telephonic interpretation services in at least 100 languages
- C. Update the language access implementation plan at least every three years and publish it on our agency website

IV. Agency language access accomplishments and progress on goals from previous LAIP

- DVS is revising its Veteran Resource Guide and will make available in the ten city languages and is now updating that to include event flyers and added services as appropriate.
- DVS has placed "You have the two translations" cards at the front entrance when people enter our offices.
- In preparation for "The Wall That Heals," the traveling Vietnam Veterans Memorial, DVS translated signs and marketing materials into Vietnamese and 11 other unique languages.
- Strengthened partnership with MOIA establishing a better understanding of our community's language access needs.

- Enhanced in-house language access capabilities (hired Farsi/Dari linguist), bolstering services available following Afghanistan refugee crisis
- Fostered community relationships with Korean Veteran contingency by attending local chapter meetings and participating in ceremonial events
- Expanded outreach to Spanish speaking communities, placing Spanish language print ad for transitioning military service members and their families
- Raised cultural awareness within Veteran community through social media posts celebrating and highlighting important cultural holidays

V. LEP Population Assessment

The U.S. Department of Justice“Four-Factor Analysis”

Factor 1: The Number or Proportion of LEP Persons in the Eligible Service Population

LANGUAGE SPOKEN AT HOME				
Population 5 years and over	7,863,680	+/-717	7,863,680	(X)
English only	4,044,156	+/-33,888	51.40%	+/-0.4
Language other than English	3,819,524	+/-33,944	48.60%	+/-0.4
Speak English less than "very well"	1,761,502	+/-24,900	22.40%	+/-0.3
Spanish	1,879,960	+/-18,066	23.90%	+/-0.2
Speak English less than "very well"	854,727	+/-16,938	10.90%	+/-0.2
Other Indo-European languages	1,010,333	+/-26,253	12.80%	+/-0.3
Speak English less than "very well"	414,650	+/-16,578	5.30%	+/-0.2
Asian and Pacific Islander languages	695,232	+/-12,681	8.80%	+/-0.2
Speak English less than "very well"	424,403	+/-11,530	5.40%	+/-0.1
Other languages	233,999	+/-14,864	3.00%	+/-0.2
Speak English less than "very well"	67,722	+/-5,896	0.90%	+/-0.1

Figure 1 Population 5 Years & Over with Limited English Proficiency by NTA NYC 2013-2018 (NYC Department of City Planning)

In figure 1, there are 1,761,502 New York City residents who speak English less than “Very Well.” While each one of these residents is a potential DVS constituent, our agency’s core demographic is veterans, service members, and their families. Figure 2 breaks down our consistency based on different attributes.

Veteran Population by Age and Sex

	Veterans		Percent Veterans	
Label	Estimate	Margin of Error	Estimate	Margin of Error
SEX				
Male	106,575	±6,269	89.6%	±1.7
Female	12,307	±2,058	10.4%	±1.7
AGE				
18 to 34 years	10,146	±1,973	8.5%	±1.6
35 to 54 years	23,286	±3,073	19.6%	±2.2
55 to 64 years	23,349	±3,075	19.6%	±2.2
65 to 74 years	23,601	±2,660	19.9%	±1.8
75 years and over	38,500	±2,936	32.4%	±2.4

Racial Breakdown of NYC Veterans

	Veterans		Percent Veterans	
Label	Estimate	Margin of Error	Estimate	Margin of Error
White alone	50,879	±3,886	42.8%	±2.7
Black or African American alone	36,093	±3,607	30.4%	±2.3
American Indian and Alaska Native alone	1,053	±559	0.9%	±0.5
Asian alone	7,099	±1,560	6.0%	±1.3
Native Hawaiian and Other Pacific Islander alone	N	N	N	N
Some other race alone	10,384	±2,367	8.7%	±1.8
Two or more races	13,374	±1,950	11.2%	±1.6
Hispanic or Latino (of any race)	27,098	±3,368	22.8%	±2.4
White alone, not Hispanic or Latino	46,971	±3,874	39.5%	±2.7

Table 2 Proportion of NYC Veterans (NYC Department of Veterans' Services)

According to U.S. Census (2022 American Community Survey 5-Year Estimates), there are 118,882 veterans in New York City. However, DVS uses a comprehensive approach to count its eligible service population. As of 2017, DVS considers roughly 210,000 New York City veterans as its core constituency. We serve Veterans, regardless of discharge status or length of service, active duty, National Guard, Reserves, and their families.

Reputable sources that enumerate the number or proportion of LEP persons in the agency's eligible service population are limited. As a new agency we have yet to compile comprehensive data sets that capture the number and proportion of LEP persons in the eligible service population.

For military enlistment purposes, the United States includes Guam, Puerto Rico, the U.S. Virgin Islands, the Northern Mariana Islands, American Samoa, the Federated States of Micronesia, the Marshall Islands and Palau - areas where English is the commonly used language. The U.S. Census (2009-2013) estimated the percentage of "population 5 years and over" that "speak[s] English less than 'Very Well'" to be 9%. Furthermore, all service branches require applicants to speak, read, and write English fluently. Therefore, an overwhelming majority of DVS's service population is proficient in English—which has borne out that DVS received zero requests for translation services in previous years.

DVS also serves family members who might not be as proficient in English. As of March 2021, we do not have the data that delineates family members of veterans or that of service members who might be LEP persons in the eligible service population. While we do not have enough data to capture the number of LEP individuals, DVS can confidently extrapolate the number to be exceptionally low. Moreover, DVS staff are advised to reach out to their managers should an LEP need arise. That has not happened to date.

Factor 2: The Frequency with which LEP Individuals Come into Contact with The Agency

There is not enough data to distinguish LEP individuals in the eligible service population because the frequency with which LEP individuals meet with DVS is exceptionally low. Yet, DVS continues to meet and/or exceed its language access goals while interacting with the eligible service population.

Currently, DVS does not track constituents' family members who might be LEP individuals. At this stage, the agency is unable to accurately evaluate the number of this potential LEP segment. Since its establishment, the agency has not received any language service requests or complaints.

Factor 3: The Importance of the Benefit, Service, Information, Or Encounter to The Limited English Proficient Person

DVS recognizes the importance of the benefits, services, information, and encounters to the limited English proficient person. The agency also considers the consequences of the lack of language services or inadequate interpretation or translation on the eligible service population. DVS continuously strives to serve every member in its eligible service population regardless of language proficiency with the resources it has.

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

DVS has access to internal and external language resources. Internally, an assessment will be conducted to leverage any in-house language proficiencies. However, bilingual staff will be used primarily to communicate one-on-one with LEP clients and review already translated materials for quality and accuracy.

Externally, DVS would use NYC DCAS's contracting services to meet its language access requirements. The Language Access Coordinator will also work with each section to determine the agency's language access capacity through staffing and contracted services.

Since its establishment in 2021, DVS has incurred the following costs:

Type of Service	Vendor	Instances	Costs
Telephonic Interpretation		0	\$0.00
On-Site Interpretation (excluding sign language)	N/A	0	\$0.00
Sign Language Interpretation	N/A	0	\$0.00
Written Translation	N/A	0	\$0.00
Bilingual Skills Testing	N/A	0	\$0.00
Total			\$0.00

As DVS works through the process of finalizing FY24 financial plans, language services will be considered as an ongoing component of the agency's budget.

Based on the "four-factor analysis" and current agency data, DVS determined that at this point, translating documents beyond the designated ten languages is not necessary. Nevertheless, DVS will remain attentive to changes in language service requests/complaints and will adjust to its

constituents' needs and staff performance.

VI. Provision of Language Access Services

DVS provides language access services in the designated citywide languages.

Translation Services

The Language Access Coordinator (LAC) will identify the most commonly distributed documents to the public. Documents that contain important information regarding the provision of “basic city services,” and focus on what constituents must know will be revised following plain language guidelines before translation.

While DVS does not provide “basic city services” to its constituents, the agency will incorporate plain language guidelines in the development and maintenance of important documents. DVS also has multi-language signs that indicate the availability of free language services.

The NYC Department of Veterans' Services Emergency Preparedness Plan ensures that customers who are limited English proficient are able to access language services in the case of an emergency.

Following the Plain Writing Act of 2010, DVS will review and revise previously generated documents as well provide plain language trainings or protocols that ensure that materials are reviewed for plain language. The agency will ensure newly developed documents enable constituents to:

- A. find what they need,
- B. understand what they find, and
- C. use what they find to meet their needs

For other agency communications like digital communications/media and website, DVS will employ the following resources:

- **Website:** the standard “Google Translate” widget (shown below) and drop-down menu translates DVS’s webpage to multiple language. DVS will also find new ways to make its website more accessible in terms of translating key content, ensuring translated materials are posted, improving access and navigation to the translated materials



- **Social Media:** each platform has its own way of translating posts in a language that is different than the default user profile. Generally, the user would see a visual cue to solicit an action or indicate that translation has automatically occurred.
- DVS recognizes that the accuracy of these tools is not on par with the level of a contracted vendor. Yet, this solution is the best given the ephemeral nature of social media posts.

Interpretation Services

In-person Interpretation

DVS provides interpretation services where it is deemed necessary and fiscally responsible to facilitate interaction with the service population. When an LEP constituent visits the agency's main office, a language identification flashcard or "I speak..." cards (example below) will be help frontline staff to determine the LEP's preferred language. Most of these cards are designed to have more than 20 languages.

Figure 3 U.S. Census Language Identification Flashcard (U.S. Department of Commerce)

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<div style="display: inline-block; text-align: left;"> United States[®] Census 2020 </div> <div style="display: inline-block; text-align: right; flex-grow: 1;"> <h2 style="margin: 0;">Language Identification Card</h2> </div>
<p>I work for the U.S. Census Bureau. Is someone here now who speaks English and can help us? If not, someone may contact you who speaks_____.</p>
Español (Spanish 02)
<p>Trabajo para la Oficina del Censo de los EE. UU. ¿Se encuentra alguien que hable inglés y pueda ayudarnos? Si no, alguien que habla español podría comunicarse con usted.</p>
普通话、广东话 (Chinese simplified)
<p>我是美国人口普查局的工作人员。请问您这里有没有会说英语的人可以帮助我们? (Mandarin 03): 如果没有, 可能会有会讲普通话的人与您联系。 (Cantonese 04): 如果没有, 可能会有会讲广东话的人与您联系。 如果您閱讀繁體中文, 請參閱第2頁 (普通話或廣東話) (Chinese traditional on pg 2)</p>
Tiếng Việt (Vietnamese 05)
<p>Tôi làm việc cho Cục Thống Kê Dân Số Hoa Kỳ. Hiện có ai ở đây biết nói tiếng Anh và có thể giúp quý vị và tôi không? Nếu không, một nhân viên nói tiếng Việt có thể sẽ liên lạc với quý vị.</p>
한국어 (Korean 06)
<p>저는 미국 인구조사국에서 일하고 있습니다. 여기 계신 분 중에서, 영어를 하실 수 있어서 저희를 도와주실 수 있는 분이 혹시 계신지요? 없으시면, 한국어를 하시는 분이 연락을 드릴 수도 있습니다.</p>
Русский (Russian 07)
<p>Я представляю Бюро переписи населения США. Присутствует здесь кто-нибудь, кто говорит по-английски и мог бы помочь нам? Если нет, то тогда возможно, с Вами свяжется наш сотрудник, говорящий по-русски.</p>
العربية (Arabic 08)
<p>أنا أعمل لمكتب الإحصاء الأمريكي. هل يوجد شخص هنا يتكلم الإنجليزية و يمكنه ان يساعدنا الآن؟ إذا لا، فقد يتصل بكم شخص يتكلم اللغة العربية.</p>
Tagalog (Tagalog 09)
<p>Nagtatrabaho ako para sa Kawanihan ng Senso ng U.S. Mayroon ba rito ngayong nagsasalita ng Ingles at maaaring tumulong sa amin? Kung wala, maaaring may kumontak sa inyo na nagsasalita ng Tagalog.</p>
Polski (Polish 10)
<p>Jestem pracownikiem Urzędu Spisu Ludności USA. Czy w tej chwili jest tu ktoś, kto mówi po angielsku i może nam pomóc? Jeżeli nie, może skontaktować się z Państwem ktoś, kto mówi po polsku.</p>
Français (French 11)
<p>Je travaille pour le Bureau de recensement des États-Unis. Y a-t-il quelqu'un ici qui parle anglais et qui pourrait nous aider? Sinon, quelqu'un qui parle français pourrait vous contacter.</p>
Kreyòl Ayisyen (Haitian Creole 12)
<p>Mwen travay pou Biwo Resansman Etazini. Èske gen yon moun la ki pale anglè ki ka ede nou? Si pa genyen, yon moun isit la ki pale kreyòl ka rele ou.</p>
Português (Portuguese 13)
<p>Trabalho para a Agência do Censo dos EUA. Há alguém aqui, agora, que fale inglês e que possa nos ajudar? Caso não haja, uma pessoa que fala português poderá entrar em contato com você.</p>
日本語 (Japanese 14)
<p>私はアメリカ合衆国国勢調査局の係員です。こちらには英語を理解でき この調査にご協力いただける方がいらっしゃいますか? もしいない場合は、日本語を話す係員があなたに連絡をすることがあります。</p>

DVS provides free interpretation in the ten designated citywide languages as required by LL30 as a part of other agency communication, including public events. The agency incorporates requests for interpretation in the planning of public events. Additionally, The Language Access Coordinator works with staff, clients, and vendors to ensure interpretation services quality.

Telephonic Interpretation

DVS also interacts with clients over the phone. The agency seeks to provide telephonic interpretation in at least 100 languages by contracting with a vendor at the appropriate time. If a staff member is unable to identify the LEP's spoken language, customer service from a contracted vendor would be able to assist. Necessary policies and procedures will be developed to enable staff to identify the language and effectively deliver information to clients.

Notification of Free Interpretation Signage

DVS posts multilingual signage regarding the provision of free interpretation services. These visual cues are posted at the main office, borough centers, and during public events. DVS will design its own signage or outsource a design like other city agencies.

Free interpretation signage in combination with language identification/I Speak...cards provide a comprehensive method for LEPs to communicate with staff. If an individual indicates a need for assistance, staff will identify an onsite employee that speaks the client's language. If this option is not available, staff would use the language line telephone interpretation service.

Emergency Preparedness Plan

The NYC Department of Veterans' Services Emergency Preparedness plan ensures that customers who are limited English proficient are able to access language services during an emergency.

This plan includes ensuring that documents are translated and signage in public locations is conspicuous, appropriate multilingual signage and LEP identification tools are available at emergency sites, interpreters can be contacted and utilized, and other translation resources and vendors are available in the event of an emergency.

VII. Training

The Language Access Coordinator (LAC) will implement and conduct a language access training program for current staff and new employees. The program will train staff on language access policies and procedures and how to incorporate plain language design strategies.

DVS will train frontline workers and managers. Based on the agency's mission, the following teams would be frontloaded: field coordinators, front-desk, and housing and communication. The LAC would work with the heads of each line to implement a "train-the-trainer" model to ensure existing and new staff are fully trained.

The LAC will also maintain a database of trained staff and training frequency for compliance and other pertinent purposes. Coupled with other data, this information will also be used to improve

the performance of DVS services and response to language requests and complaints.

Although the training plan will be tailored to DVS's size and recent establishment, it will consider the following topics (NYC MOIA guidelines):

- The rationale for language access, city demographics, and DVS's language access policies, resources, and standard procedures.
- Identifying customer's primary language; reporting requests for language services; use of dual handsets; and the use of telephonic interpreters; and
- Plain language, cultural competency, and disability communications.

The LAC works with DVS managers to have systems in place to appropriately monitor progress of LL30 requirements (number of staff trained on language services, the number of commonly distributed documents identified and translated, etc.

VIII. Record Keeping and Evaluation

The Language Access Coordinator (LAC) works with each section to add language pertinent data entry points to sign-in sheets, intake forms, CRM inputs, and from the agency's interactions with the service population. The LAC will ensure data gathered from multiple sources is properly tracked, maintained, and reviewed to identify any additional language needs and to ameliorate the agency services.

The collected data will be used to monitor the efficacy of DVS's language implementation plan and compliance with Local Law 30. The LAC is responsible for reviewing records and making any necessary adjustment on annual basis. The data collection and management will also ensure compliance with other record-keeping laws and regulations.

The agency plans to ensure the quality of translation and interpretation services by using only verified vendors from NYC DCAS Citywide Contracts for Language Services. Furthermore, DVS plans to leverage internal language proficiencies to verify the quality and accuracy of language services (interpretation and translation).

IX. Resource Analysis and Planning

Currently, DVS does not have the capacity to provide comprehensive language access. Nonetheless, the agency is working to integrate language access requirements in the upcoming budget. In the interim, DVS plans to follow through with its language access implementation plan.

DVS has access to city resources and bilingual staff. The agency plans to use language proficient staff and contract any necessary services through NYC DCAS Citywide Language Services. The recent establishment of DVS enables agency to easily identify gaps in language access. Furthermore, DVS's small size and exceptionally low number of LEP in the service population enables the agency to closely monitor and improve the quality of language assistance services.

X. Outreach and Public Awareness of Language Access Services

DVS hosts many outreach and community events. Since its inception, the agency has been able to connect with and communicate its services to the target audience. The agency hopes to increase public language services at future events.

Once DVS establishes a capacity to provide comprehensive language access services and to create public awareness of the availability of these services, the agency will use the following strategies and outreach activities:

- Social Media and online (Twitter, Facebook, Instagram, Medium, YouTube, and DVS's website)
- Depending the platform, a campaign would be launched to advertise the availability of language access services
- Media, flyers, event announcements, and other posted activities will have relevant info about the availability of free interpretation services.

XI. Language Access Complaints

DVS's Language Access Coordinator (LAC) will be the point of contact for all language access complaints, questions, and requests. The eligible service population is encouraged to bring to DVS's attention any language-related issues using all means of communication. Common sources include 311, the "ContactUs" page of DVS's website, social media, and walk-ins.

The LAC would ensure record-keeping related to language access questions, requests, and complaints. The data would be used to review DVS's performance and address any areas of improvements.

Staff at the backend of each interaction (online, phone, and in-person) would triage language access complaints, questions, and requests and forward them to the LAC. The LAC handles receiving, tracking, and resolving complaints.

The table below is an example of how DVS plans to include information on complaints as part of annual agency reporting.

How members of the public can submit language access complaints, questions, and requests	Agency 311 Data (CY 2020)	complaints/requests were addressed
<ul style="list-style-type: none">• Online form on our official webpage under "Contact Us."➤ "Send a message to➤ Connect@veterans.nyc.gov	# of language access complaints received via 311: 0	Not applicable

<ul style="list-style-type: none"> • Call <ul style="list-style-type: none"> ➤ 311 ➤ 212-416-5250 • Email <ul style="list-style-type: none"> ➤ press@veterans.nyc.gov • In person <ul style="list-style-type: none"> ➤ 1 Centre Street 22nd Floor, Suite 2208 New York, NY 10007 	# of requests for language access resources via 311: 0	Not applicable
<ul style="list-style-type: none"> • Tweet or Direct Message <ul style="list-style-type: none"> ➤ @nycveterans • Comment or Send Message <ul style="list-style-type: none"> ➤ nycveterans 		

*The table has hyperlinks to our online form, email address, Twitter handle, and Facebook page.

XII. Implementation Plan Logistics

- Submit finalized LAIP to the Mayor's Office of Immigration Affairs
- Update existing language access training materials
- Train DVS staff on LL 30 and other relevant language access protocol and best practices to better serve the Veteran community
- Programs and Budget: Routinely assess the frequency with which DVS receives requests for LEP/LEP-related services, and evaluate agency resources to enhance LEP as necessary
- Maintain a productive, working relationship with other agencies to gather insights and best practices on LEP services

Given DVS's recent establishment and small size of 39 active employees, the table above presents a reasonable timeline that addresses the requirements of the LAIP under LL30. Over the next year, the agency's focus will be on maintaining and improving its language access policies/procedures, tracking language service requests and complaints, maintaining records, analyzing gathered data, and reporting. While LL30 calls for an updated language access plan every three years, DVS will periodically review its plan and, when necessary, consider impactful changes.



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