

# **NEW YORK CITY ADMINISTRATION FOR CHILDREN'S SERVICES**

## **IMPLEMENTATION UPDATE FOR 2005 ON LOCAL LAW 73**

**MARCH 31, 2006**

### **I. INTRODUCTION**

This implementation plan update presents the steps that the New York City Administration for Children's Services (Children's Services/ACS) has initiated during calendar year 2005 to ensure compliance with Local Law 73 of 2003. The update also provides data on the number of limited English proficient persons served by Children's Services during 2005.

In October 2004, Children's Services provided an implementation plan to ensure compliance with Local Law 73. The plan demonstrates Children's Services' commitment to providing meaningful access to all individuals seeking benefits and services, including individuals with limited English proficiency. Our policy is that individuals should not face obstacles to receiving social services for which they may be eligible because they do not speak English. The purpose of the implementation plan is to ensure that persons eligible for Children's Services' assistance receive such assistance and to avoid the possibility that a person who attempts to access services will face discrimination based on the language he or she speaks.

The implementation plan emphasizes that the mission of Children's Services is to ensure the safety of all the children of New York, which includes those with limited proficiency in English. Children's Services believes that the safety, permanency and well-being of children is best achieved through a Neighborhood Based Services approach that seeks to provide every child and family with culturally, linguistically and need-driven services within their communities. Children's Services is committed to providing high-quality child welfare and child care services and enhancing family engagement in these services. Promoting access to services through language assistance is critical for workers to interact effectively with families and improve outcomes for children and families.

The Local Law 73 Implementation Update for 2005 provides a status report on the different components of the Children's Services implementation plan based on activities initiated in 2005 and also includes an analysis of the number of limited English proficient persons served by Children's Services during 2005, disaggregated by primary language and Children's Services office.

## **II. SUMMARY OF 2005 INITIATIVES TO IMPROVE LANGUAGE ASSISTANCE SERVICES**

Children's Services is making significant progress in its efforts to provide limited English-proficient clients with timely access to services needed to protect children and strengthen families. Among the activities initiated in 2005 include:

- Revising and reissuing the Children's Services Immigration and Language Guidelines for Child Welfare Staff. These guidelines were provided to all Children's Services staff and our contract agencies, and have been used nationally as a model.
- Recruiting bilingual persons to become child protective workers. All new hiring of child protective workers provide applicants who have bilingual skills in high need languages a preferred qualification for employment.
- Children's Services is putting in place a new telephonic interpretation system to provide access to an interpreter within one or two minutes. This new system will improve language assistance for home visits when language needs are unknown. It will also provide a mechanism to identify the primary language of a client when the use of the language identification card is not successful.
- Notices promoting the availability of language assistance services are being placed in all Children's Services Division of Child Protection (DCP) field offices.
- Children's Services has undertaken a major project to translate key notices/documents and public education materials into other languages. All translations will have a second level of review to improve accuracy of translations.
- Children's Services is working with the New York State Office of Children and Family Services to implement changes to Connections, the primary computer system for child welfare. These changes will support the collection of accurate primary language information.
- Children's Services secured grant funding to hire a Director of Immigrant Services with responsibility for Local Law 73 implementation and other initiatives to improve services to immigrant children and their families.

### **III. 2005 IMPLEMENTATION UPDATE**

#### **A. Identification of Primary Language**

##### **1. Relevant Portion of Law:**

*Upon initial contact, whether by telephone or in person, with an individual seeking benefits and/or services offered by an other covered agency, the other covered agency shall determine the primary language of such individual. If it is determined that such individual's primary language is not English, the other covered agency shall inform the individual in his/her primary language of available language assistance services.*

*"Primary language" means the language in which a limited English-proficient individual chooses to communicate with others.*

##### **2. Implementation Plan:**

- a.** Children's Services created the *ACS Language Identification Card* in 2004. The *ACS Language Identification Card*, which is laminated for extended use, contains translation in twenty-eight languages in order to facilitate language identification. The languages selected for inclusion on the card represent those most commonly encountered by Children's Services child welfare staff.
- b.** The *ACS Language Identification Card* was distributed in May 2004 to all staff members at Children's Services who have direct contact with individuals seeking Children's Services benefits and/or services, along with the recently published *Administration for Children's Services Immigration and Language Guidelines for Child Welfare Staff* ("Guidelines"). Both tools were created to assist child welfare staff in meeting the unique challenges posed by the diverse needs of New York City's immigrant and limited English proficient communities and to increase access to services for all New York City children and families. The last two pages of the Guidelines contain a reproduction of the *ACS Language Identification Card*.
- c.** The Guidelines include specific instructions for complying with Local Law 73. These instructions state that upon initial contact with a family, child welfare staff is to determine the primary language of the family members through utilization of the *ACS Language Identification Card*, and further they are to notify the individuals of the available language assistance services and to offer them an interpreter. Children's Services will issue to all affected program areas a directive reiterating these requirements and specifying the data collection requirements related to Local Law 73 by the end of calendar year 2004.

- d. Children's Services is exploring the possibility of and necessary resources for expanding its current interpretation and translation contract to offer language assistance services to help staff identify a client's language when the *ACS Language Identification Card* is ineffective because a client's primary language falls outside of those represented on the ACS Language Identification Card and/or the client is illiterate.

**3. 2005 Implementation Update:**

- a. In August 2005, Children's Services hired a Director of Immigrant Services with responsibility for overseeing Children's Services' implementation of Local Law 73. The Director met with each office in Children's Services that has direct contact with clients and briefed each office on Local Law 73 requirements and Children's Services policy on meeting language needs of Limited English Proficient (LEP) clients. The Director met with the Division of Child Protection, the Office of Advocacy, the Office of Parent Recruitment and Expedited Permanency, Family Home Care, the Teen-age Service Act (TASA) program, and the Child Care and Head Start Division. Each office was instructed in the process for determining the primary languages of clients it serves and on how to collect and report the number of LEP clients seeking services from Children's Services.
- b. Children's Services accessed demographic data from the Department of Education to help identify current data on the languages spoken by students in the NYC public schools as a way of determining new languages spoken by families with children. We identified a number of additional African languages, including Wolof, and Soninke, that are now increasing in use in New York City, but are not on our current language identification card. In addition, Children's Services learned that a growing number of Mexican immigrants speak Mixteca, rather than Spanish, and this language is also not included in the current version of our language identification card. Children's Services is in the process of adding these additional languages to the *Language Identification Card*.
- c. Children's Services is also in the process of putting into place a new telephonic interpretation system. This system will give access to a telephonic interpreter within one to two minutes. This new telephonic interpretation system will permit Children's Services staff that is having difficulty in identifying the primary language of clients, to contact a telephonic interpreter who will be able to identify the client's language. The telephonic interpretation can also be used if the client is illiterate and is not able to use the *Language Identification Card*.

**B. Notice Regarding Free Language Assistance**

**1. Relevant Portion of Law:**

*Upon initial contact, whether by telephone or in person, with an individual seeking benefits and/or services offered by an other covered agency, the other covered agency shall determine the primary language of such individual. If it is determined that such individual's primary language is not English, the other covered agency shall inform the individual in his/her primary language of available language assistance services.*

**2. Implementation Plan:**

- a. When an individual is determined to have a primary language other than English, staff will inform the individual of available language assistance services in the individual's primary language by using the Language Identification Card, directly using the individual's primary language, or using the interpreter service.
- b. As needed, Children's Services will post multilingual signage in those offices and other appropriate service sites where clients are served advising clients of the availability of language assistance.

**3. 2005 Implementation Update:**

- a. In conjunction with implementing a new telephonic interpretation system, Children's Services is posting multi-lingual signage in all offices in which clients seek services from Children's Services.
- b. Children's Services will be updating the Language Identification Card to include additional languages. African languages including Wolof and Soninke are being included, as well as Mixteca, a language spoken in Mexico.

**C. Language Assistance Services**

**1. Implementation Plan:**

- a. Once the primary language of a child or family served by Children's Services is determined, interpretation and translation services can be arranged through Children's Services' existing contracts which are available to Division of Child Protection (DCP) staff, and have been used by other Children's Services divisions based on identified need. An internal memorandum was issued November 3, 2003 outlining the procedures for obtaining interpretation and translation services in over 140 languages. These services are available twenty-four hours a day, seven days a week for Child Protective Services staff.
- b. Children's Services is in the process of determining the feasibility of and necessary resources for expanding the current language assistance contract to serve the remainder of the agency. In accordance with an expanded contract, Children's Services will develop and implement a training program for the remainder of the direct service staff regarding language access services. Children's Services will also update and reissue the internal memorandum for agency-wide distribution on availability of language assistance services.

**2. 2005 Implementation Update:**

- a.** Children's Services undertook an analysis of the expenditures made under the existing multi-year contract for interpretation and translation services to determine the capacity to expand access to interpretation and translation services throughout Children's Services. Our analysis in October 2005 found that there were sufficient funds available, in the short term, to expand the availability of interpretation and translation services throughout all Children's Services programs. Also identified was the need for stronger administrative support in order to expand access to all Children's Services offices; that current staffing permitted other offices to access these services, but that more support was needed to decentralize these services throughout Children's Services. A job listing was posted for a new position to manage the interpretation and translation contract. The Director of Immigrant Services has met with the other Children's Services offices to inform them that translation services are available to them, and the steps needed to secure these services. Once a new contract manager is in place, Children's Services will issue an internal memorandum on the availability of language assistance services.
- b.** Children's Services also determined that the current contract for interpretation and translation services did not meet all of the needs of Children's Services. In particular, child protective workers reported that the process for accessing an interpreter did not adequately meet their needs. The need for two levels of approval, and the need for four hour notice for an in-person interpreter, or a one to two hour wait for a telephonic interpreter created barriers to utilizing interpreters. In addition, the system did not work well for child protective investigations. Child protective workers making home visits were not able to access an interpreter on a timely basis, unless they knew the client's primary language beforehand. To remedy this situation, Children's Services is in the process of implementing an immediate telephonic interpretation system. Children's Services is issuing cellular phones to all CPS workers and supervisors in order to provide better communication between field staff and the borough offices. The phones will have the added purpose of facilitating the telephonic interpretation system. Children's Services staff will be able to access a telephonic interpreter within two minutes by dialing a toll free number and entering a special access number.
- c.** Children's Services is also in the process of translating key notices/documents and public information materials into Spanish and other languages. Each division of Children's Services has identified key notices/documents and public information materials and we are now in the process of translating these materials using our current contractor for interpretation and translation services. We are also developing a second layer of review, including the use of Children's Services bilingual staff who volunteers to assist and community based organizations who also volunteer to review the translations. In addition, we are developing a glossary of terms to be used to make translations more consistent.

- d. The Children's Services Statewide Training Academy is revising the current training being provided to all new Children's Services employees and supervisors to expand training on identifying the primary languages of Children's Services' clients, how to access interpreters and also how to effectively use interpreters. Children's Services is also examining how current employees can receive this training as well.

**D. Quality Assurance Measures**

**1. Relevant Portion of Law:**

*No later than the first day of the sixtieth month after the effective date of the local law that added this chapter, every other covered agency shall maintain records of the primary language of every individual who seeks or receives ongoing benefits or services. At a minimum, the other covered agency shall maintain specific records of the following:*

- 1. The number of limited English proficient individuals served, disaggregated by type of language assistance required and primary language;*
- 2. The number of bilingual personnel and the number of interpreter personnel employed by the other covered agency, disaggregated by language translated by such personnel;*
- 3. Whether primary language determinations are recorded properly; and*
- 4. Whether documents are translated accurately and disseminated properly.*

**2. Implementation Plan:**

- a. Children's Services' Office of Quality Improvement, in conjunction with other relevant program areas, will devise a plan by end of calendar year 2005 to establish a methodology and process for assuring that primary language determinations are recorded properly and that documents are translated accurately and disseminated properly.

**3. 2005 Implementation Update:**

- a. Children's Services undertook an analysis of primary languages identified in the Connections data base between January 2005 and July 2005 for children and adults involved in child abuse and neglect cases. Over 118,000 language fields were included in the analysis. Of the 118,000 language fields, 110,000 identified English as the primary language. Approximately 7,000 fields included Spanish; and 1,000 fields included other languages. Based on demographic and language need data, we would have anticipated at least twice as many Spanish language fields. (Data on primary languages for 2005 is presented later in report.) Upon further analysis, we recognized that the primary language field defaulted to English. In other words, if no language was entered, the language field would read as English. In addition, there was a language field marked multiple; and as Local Law 73 requires the collection of data on the primary language, multiple languages is an inappropriate

language field. We requested in November 2005 from the New York State Office of Children and Family Services edits of the primary language fields on Connections to replace the English default with a blank default, and to eliminate the multiple language field as well. Once these changes are in place it will enable us to follow up on all blank language fields to determine the correct primary language field.

- b. Children's Services is also assessing other alternatives for determining whether primary languages are recorded properly. We are assessing the feasibility of comparing a list of clients who receive language assistance services to the list of persons recorded as having a primary language other than English. This would help identify those who are receiving language assistance services but were recorded incorrectly. We are also considering using foster care and preventive agencies who are working with families referred by child protective services to determine if primary languages were recorded properly. In addition, we are evaluating the feasibility of conducting a survey of a statistically valid sample of clients to determine whether primary languages were recorded properly.
- c. As reported earlier, Children's Services is currently in the process of translating key notices/documents and public education materials. We are including in this process a second level of review to determine if documents have been translated accurately. As part of the process outlined in paragraph b above, we will include in our system a way to determine that primary languages are recorded properly, and a process for determining if translated documents have been disseminated properly. In addition, the next major changes to Connections will include making available additional state notices in different languages. This will include a system that will record when these notices in other languages are produced and disseminated, providing another mechanism for determining if translated documented are disseminated properly.

**E. Training**

**1. Implementation Plan:**

- a. To ensure that the *ACS Language Identification Card* is used and that interpretation/translation services are offered to children and families, Children's Services has incorporated Local Law 73 directives into the Common Core training, which is provided through the Satterwhite Academy, Children's Services' training center for child welfare staff. The following steps have been taken to introduce the *Immigration and Language Guidelines for Child Welfare Staff* and facilitate its implementation into casework practice within the following Children's Services curricula:

***Common Core, Supervisory Common Core, and the CPS Specialty:***

- The Culture modules, or appropriate sections of the curriculum, were enhanced with an introduction and review of the *Immigration and Language Guidelines for Child Welfare Staff* booklet
- Tools in the booklet, such as the *ACS Language Identification Card*, are referenced and discussed
- Memorandum – the official *Immigration and Language Guidelines for Child Welfare Staff* memorandum on Special Immigrant Juvenile Status is distributed and discussed
- The form, Referral for Foster care Immigration Law Services, is provided as a handout and discussed
- The ACS Immigration and Language Issues Reference List is provided separately as a handout, referenced and discussed
- The *Immigration and Language Guidelines for Child Welfare Staff* booklet is distributed and displayed on the resource table
- Immigration and Language Guidelines are referenced in the Legal part of the curricula, presented by a training attorney.

***Immigrant Issues curriculum:***

- *Immigration and Language Guidelines for Child Welfare Staff* is the focal point of the training
- Official Children’s Services policy on immigration and language is presented and practiced.

***Core Phase II, Legal Issues training:***

- Legal aspects of the *Immigration and Language Guidelines for Child Welfare Staff* are presented, including Special Immigrant Juvenile Status
- *Immigration and Language Guidelines for Child Welfare Staff* booklet is distributed.

***Resource Table in Classrooms:***

- *Immigration and Language Guidelines for Child Welfare Staff* booklet is available in sufficient quantities in every classroom during Core Phase II trainings

- b. As a next step, the Satterwhite Academy will conduct a debriefing of all training and curriculum staff on the *Immigration and Language Guidelines* and related child welfare policies. The Academy will review all remaining curricula and determine where revisions related to Local Law 73 are appropriate.
- c. Children’s Services will develop a plan to ensure the training of all staff that have direct contact with individuals seeking Children’s Services benefits and/or services. This training plan will be developed by the end of calendar year 2005.

**2. 2005 Implementation Update:**

- a. As part of the project to revise and improve the culture modules included in the Common Core and Supervisory Common Core training, Children’s Services is also revising the training provided on the “*Immigration and Language Guidelines for Child Welfare Staff*”. In particular, more emphasis will be placed on the process for determining the primary language of clients, on the importance of using interpreters (reiteration of Children’s Services policy not to use family members or neighbors for interpretation), and how to effectively use interpreters.
- b. As part of the roll-out of the new telephonic interpretation system, staff will also receive training on Local Law 73 and Children’s Services language assistance policies.

**F. Recordkeeping and Monitoring**

**1. Relevant Portion of Law:**

*No later than the first day of the sixtieth month after the effective date of the local law that added this chapter, every other covered agency shall maintain records of the primary language of every individual who seeks or receives ongoing benefits or services. At a minimum, the other covered agency shall maintain specific records of the following:*

- 1. *The number of limited English proficient individuals served, disaggregated by type of language assistance required and primary language;*
- 2. *The number of bilingual personnel and the number of interpreter personnel employed by the other covered agency, disaggregated by language translated by such personnel;*
- 3. *Whether primary language determinations are recorded properly; and*
- 4. *Whether documents are translated accurately and disseminated properly.*

**2. Implementation Plan:**

- a. Children’s Services Management Information Systems (MIS) proposes to implement an automated recording and reporting system to support Local Law 73. When appropriate analyst and programming resources become available, MIS would launch a project to implement a long-term solution for Local Law 73 record-keeping and reporting requirements.
- b. The project will follow a standard systems development life cycle, which includes six phases: initiation, analysis, design, construction, implementation, and maintenance.
- c. In conjunction with analysis and implementation of the long-term system, Children’s Services will advance a phased approach to comply with Local Law 73 requirements. A description of short-term, interim and long-term plans follows:

***i. Short-Term Plan***

During Local Law 73 implementation meetings, program area representatives identified at which points of contact with individuals seeking services and/or benefits would require Local Law 73 notification and record-keeping.

The short-term plan for record-keeping, scheduled to start on January 1, 2005, includes the following steps, completed and in-progress:

- DCP staff will be required to complete the language field in Connections, the statewide child welfare information system. This would collect data on a significant portion of the Children's Services population.

The New York State Office of Children and Family Services ("OCFS") has been notified that Children's Services requires their assistance in complying with Local Law 73. MIS is conducting an impact assessment in conjunction with the OCFS. Specifically, Children's Services is asking that the additional languages contained in the *ACS Language Identification Card* be captured in Connections. Current languages covered are: Native American language, Chinese, Creole, English, French, German, Hindi, Hebrew, Italian, Japanese, Korean, Polish, Portuguese, Russian, American Sign Language, Spanish, and Vietnamese.

- MIS and other relevant Children's Services program areas will identify and develop mechanisms to comply with Local Law 73 record-keeping requirements by the required time frames. Staff will be trained in accordance with these processes.
- MIS will require analysts and programmers for this project.

***ii. Interim Plan***

Reporting of data collected from January 1, 2005 through December 31, 2005 will begin on April 1, 2006. MIS will work with the program areas to devise a method for collecting data that will begin to be collected on January 1, 2005. Updates will appear in the Implementation Update, scheduled to be distributed on or about April 1, 2005.

***iii. Long Term Plan***

Resources permitting, MIS can launch a project for development of the Local Law 73 record-keeping and reporting project. The project will have six phases: Initiation, analysis, design, construction, implementation, and maintenance.

MIS has started analysis by compiling the points of contact for Children's Services program staff. During the next phase MIS analysts would work with program areas to further define how contact occurs, which current data processing systems are used, and which data processing systems are in development mode.

In the second phase, analysis, the user determines what he or she needs or wants the system to do. At this stage, the MIS analyst will work with program areas as they define the optimal method for capturing Local Law 73 required data at points of contact.

The third phase, design, determines how the user will achieve his or her objectives. The program area team members and MIS will participate in defining workflow, refining the need for data elements, system requirements and reports.

There is an on-going agency-wide project to build an Integrated Case Management System at Children's Services, in conjunction with the releases of Connections and phasing out of legacy Children's Services systems. The Local Law 73 requirements will be incorporated in this planning.

During MIS's preliminary investigation of system needs to capture Local Law 73 data elements, MIS has referred to extensive work done previously for the Child Protective Services (CPS) Intake and Assignment Processes. A review of this analysis reveals the systems currently in use as Connections, WMS/NYS, WMS/NYC, ACCIS, ACRS +, and CCRS. Children's Services MIS will work with OCFS to coordinate requirements with new releases of Connections and phasing out of WMS/NYS, WMS/NYC and CCRS. Request for this has been made to OCFS in Albany. These systems do not collect child care data. The local system for child care, ACCIS, is being analyzed to determine what modifications are required.

Building on analysis that preceded this project, the long-term project will consult with and revise the documents that identify how data are collected and processed at several key points in the Intake and Assignment process. These documents include information about forms used and screens used in the CPS Intake Process.

Once the data collection system is in place, training on the system will ensue for employees who have direct contact with individuals seeking services or benefits.

- d. For tracking of bilingual personnel, Children's Services will record and track bilingual personnel hired and develop a registry of bilingual personnel that can potentially be used as translators at their locations. The Office of Personnel will work with the relevant program areas regarding placement of bilingual personnel in critical areas of contacts. Children's Services will modify the existing telephone directory to include fields needed to track personnel and develop procedures. A field will be added to record language spoken. Children's Services will develop a procedure to identify bilingual personnel in order to record this data. Children's Services anticipates that the recording and sorting of this data will be operational by 2006.

### **3. 2005 Implementation Update:**

- a. The steps outlined in the short-term plan have been implemented. DCP staff has been instructed to enter primary language information into Connections, the statewide child welfare electronic case information system and database. In addition, OCFS staff did make the changes in the primary languages collected in Connections and requested by Children's Services.
- b. Children's Services has requested additional changes in the primary language fields in Connections to improve data collection of primary languages. Children's Services has requested that the default field for primary languages be changed to blank, rather than a default to English. This change will require workers to actually enter a language field. Children's Services will be able to track cases in which the language field is blank and ensure that the primary language is determined and entered into the data base.
- c. Children's Services has requested the elimination of a multiple languages field, as Local Law 73 requires the determination of a "primary language," not multiple primary languages.
- d. In addition, Children's Services has requested revising the OTHER category to require that a caseworker must manually enter the primary language of client(s) if the language is not listed in drop down menu list.
- e. Children's Services requested the following additional languages be added to the drop down list:
  - Amoy (a Chinese Coastal language)
  - Pashto (Language of Afghanistan/Iran)
  - Twi (Language of Ghana)
  - Ukranian (Language of the Ukraine)
  - Afrikaans (Language of South Africa and Namibia)
  - Tibetan (Language of Tibet)
  - Indonesian (Language of Indonesia)
  - Wolof (Language of Senegal)
  - Slovak (Language of the Slovak Republic)
  - Soninke (Language in Ghana, Mauritania, Senegal)
- f. Some additional system changes are needed to record and report on the provision of language assistance services as required under Local Law 73. Children's Services is evaluating whether these changes can be made as part of the Connections system and the Integrated Case Management System.
- g. Children's Services is re-evaluating the 2004 Implementation Plan provision for developing a registry of bilingual personnel that can be used for translations. Children's Services job titles do not include translation and interpretation as part of job responsibilities and consequently, Children's Services can-not require current staff to perform these functions. However, Children's Services is now

making bilingual skills a preferred qualification for hiring of new child protective workers, and these new personnel will be expected to use their language skills in the performance of their jobs. In addition, Children's Services has placed Spanish language interpreters in most field offices to help meet language assistance needs. These interpreters are not Children's Services staff, they are placed in our field offices by the contract agency that Children's Services works with to provide Spanish interpretation and translation services.

## **G. Coordination**

### **1. Implementation Plan:**

Children's Services has created an inter-divisional workgroup to coordinate the implementation of Local Law 73. Children's Services is also exploring resources to enable the creation of a staff position for immigration and language issues which will include responsibility for ensuring compliance with Local Law 73. This staff member will also coordinate data collection and be responsible for drafting and finalizing implementation updates and the reports that are to be published.

### **2. 2005 Implementation Update:**

- a. Children's Services secured grant funding and hired a Director of Immigrant Services to coordinate and oversee the implementation of Local Law 73. The Director has coordinated the data collection under Local Law 73 and has assumed responsibility for drafting and finalizing the 2005 implementation update.

## **H. Implementation Updates and Annual Reports**

### **1. Relevant Portion of Law:**

*Implementation updates and annual reports. No later than 90 days after the end of each calendar year after the publication of the implementation plan and before implementation is complete, the agency and each other covered agency shall publish an implementation update. The implementation update shall describe steps taken over the prior year to implement the requirements of this chapter and shall describe any changes in the agency or other covered agency's plan for implementing the remaining requirements of the local law that added this chapter before the date set forth in subdivision a of this section. The implementation update for every year after 2004 shall include a report on the number of limited English proficient people served, disaggregated by language and by agency office or other covered agency office. Not later than 90 days after the end of each calendar year beginning with 2008, the agency and each other covered agency shall publish an annual report on language assistance services. At a*

*minimum, this annual report of the agency, each agency contractor and each other covered agency shall set forth the information required to be maintained by this chapter.*

**2. Implementation Plan:**

- a. Children’s Services’ Local Law 73 Implementation Workgroup will continue to meet regularly to refine and further the subsequent implementation plans and address future issues that would include implementation updates and publishing of annual reports.

**3. 2005 Implementation Update:**

- a. The Director of Immigrant Services, who has assumed responsibility for Local Law 73 implementation, meets regularly with the relevant Children’s Services offices and staff that have responsibility for different components of Local Law 73 implementation. This structure has replaced the original Local Law 73 Workgroup.
- b. Included in this Implementation Update is data on the number of limited English proficient people served, as noted below.

**I. Primary Languages of Persons Served by Children’s Services in 2005:**

**1. Chart A: Primary Languages of Persons Involved in SCR Reports, CY 2005**

The following chart provides data on the primary languages of persons involved in child protective cases and served by Children’s Services during Calendar Year 2005. The data is broken down by borough and disaggregated by primary language. The data is derived from the Connections data base and reflects the primary language entered into Connections.

The data for 2005 shows that, for more than 215,000 language fields of children, parents, perpetrators or other family members involved in a child protective case, English was the primary language in over 189,000 or 87.7%. Spanish was recorded as the primary language in slightly more than 12,000 or 5.5% of language fields.

Nearly 1000 persons involved in a child protective case spoke a dialect of Chinese, representing a little more than one half of a percent of all persons involved in child protective cases. The third most prevalent language of persons involved in a child protective case was Russian with 288 persons or a little more than .1 percent, followed by Creole speakers with 225 persons or .1 percent.

We suspect that this data may under-represent persons whose primary language is not English who were involved in child protective cases. As noted previously, the

default entry for the language field is English. Consequently, unless the caseworker selects a language, English will be considered the primary language. For Spanish, Children's Services data indicate that approximately 35% of child protective cases involve a child who is Hispanic. Department of City Planning data shows that nearly one-half of Hispanics in New York City are not proficient in English. Consequently, we would expect Spanish to be recorded as the primary language in a significantly higher number of Children's Services cases.

To address this concern, Children's Services is revising training of workers to ensure that workers ask limited English proficient clients what language they want to communicate in, and workers also tell clients that interpreters are available. In addition, as previously indicated, Children's Services has requested revisions to Connections to change the default language from English to blank. This will help remedy the situation in which a caseworker fails to enter a primary language, and it is recorded as English. In addition, we have requested the elimination of the multiple language field, as Local Law 73 requires the recording of the primary language in which the client wants to communicate. Children's Services has also requested that the "other" field be modified to require workers to enter a language in the field, if the drop down menu does not include the language spoken by the client. We believe these changes, and other improvements in workers access to interpreters, will lead to more accurate recording of primary languages by Children's Services clients in child protective cases.

## **2. Chart B: Primary Language of Families Receiving Child Care Services**

The second chart presents data on the primary language of families receiving child care services through Children's Services. The data is a snap shot of families for whom a primary language was reported in the Children's Services child care system as of March 6, 2006. Nearly 35,000 or over 78% of families in child care speak English; while nearly 17% or over 6,500 families speak Spanish. Chinese is the third most prevalent language with over 750 families or nearly 2% speaking Chinese. Russian is the fourth most prevalent language with slightly over 1% or 459 families speaking Russian.

We are in the process of obtaining data from other offices within Children's Services.

**CHART A: Primary languages of Persons\* Involved in SCR Reports,  
CY 2005**

Language Code	Decode	Bronx		Brooklyn		Manhattan		Queens		Staten Island		OCI		Total	
AI	Nat Am Lan	6	0.00%	2	0.00%	17	0.10%	2	0.00%		0.00%	1	0.00%	28	0.00%
AL	Albanian	12	0.00%	2	0.00%	4	0.00%	5	0.00%		0.00%		0.00%	23	0.00%
AR	Arabic	24	0.00%	58	0.10%	19	0.10%	7	0.00%	9	0.10%		0.00%	117	0.10%
BN	Bengali	1	0.00%	34	0.10%	13	0.00%	37	0.10%		0.00%		0.00%	85	0.00%
CC	Chinese-Cantonese		0.00%	81	0.10%	25	0.10%	24	0.10%		0.00%		0.00%	130	0.10%
CF	Chinese Fujanese	1	0.00%	16	0.00%	14	0.00%		0.00%		0.00%		0.00%	31	0.00%
CH	Chinese-other	10	0.00%	175	0.30%	101	0.40%	176	0.40%	3	0.00%	2	0.00%	467	0.20%
CM	Chinese-Mandarin	8	0.00%	79	0.10%	24	0.10%	142	0.30%	4	0.00%	2	0.00%	259	0.10%
CR	Creole	3	0.00%	142	0.20%	4	0.00%	73	0.20%		0.00%	3	0.00%	225	0.10%
CZ	Czech	3	0.00%		0.00%	4	0.00%	3	0.00%		0.00%		0.00%	10	0.00%
EN	English	54269	87.70%	58360	89.10%	24631	85.50%	36754	85.60%	9631	93.00%	5402	90.00%	189047	87.70%
ET	Ethiopian	1	0.00%	1	0.00%		0.00%		0.00%	1	0.00%		0.00%	3	0.00%
FA	Farsi		0.00%		0.00%	2	0.00%	8	0.00%		0.00%		0.00%	10	0.00%
FL	Fulani	2	0.00%	2	0.00%		0.00%		0.00%		0.00%		0.00%	4	0.00%
FR	French	46	0.10%	19	0.00%	13	0.00%	17	0.00%		0.00%	2	0.00%	97	0.00%
GK	Greek		0.00%	1	0.00%		0.00%	20	0.00%		0.00%		0.00%	21	0.00%
GR	German	1	0.00%		0.00%	1	0.00%		0.00%		0.00%		0.00%	2	0.00%
HI	Hindu	3	0.00%	12	0.00%	1	0.00%	18	0.00%		0.00%		0.00%	34	0.00%
HW	Hebrew		0.00%	9	0.00%		0.00%	4	0.00%		0.00%		0.00%	13	0.00%

IT	Italian	1	0.00%		0.00%		0.00%	7	0.00%	1	0.00%		0.00%	9	0.00%
JP	Japanese		0.00%	1	0.00%	1	0.00%	9	0.00%		0.00%		0.00%	11	0.00%
KM	Khmer	2	0.00%		0.00%		0.00%		0.00%		0.00%		0.00%	2	0.00%
KR	Korean	1	0.00%		0.00%	3	0.00%	110	0.30%		0.00%	2	0.00%	116	0.10%
MU	Multiple	194	0.30%	87	0.10%	99	0.30%	80	0.20%	23	0.20%	43	0.70%	526	0.20%

Language Code	Decode	Bronx		Brooklyn		Manhattan		Queens		Staten Island		OCI		Total	
NI	Nigerian-Ibo	5	0.00%	3	0.00%		0.00%		0.00%		0.00%		0.00%	8	0.00%
PJ	Punjabi	2	0.00%		0.00%		0.00%	31	0.10%		0.00%		0.00%	33	0.00%
PL	Polish		0.00%	30	0.00%	3	0.00%	46	0.10%	7	0.10%		0.00%	86	0.00%
PR	Portuguese	2	0.00%		0.00%	5	0.00%	24	0.10%		0.00%		0.00%	31	0.00%
RO	Romanian		0.00%		0.00%		0.00%	6	0.00%		0.00%		0.00%	6	0.00%
RS	Russian	13	0.00%	168	0.30%	3	0.00%	87	0.20%	5	0.00%	12	0.20%	288	0.10%
SC	Serbo-Croatian	1	0.00%		0.00%		0.00%		0.00%		0.00%		0.00%	1	0.00%
SI	Amer Sign	36	0.10%	15	0.00%	17	0.10%	14	0.00%	4	0.00%		0.00%	86	0.00%
SP	Spanish	3905	6.30%	2319	3.50%	2339	8.10%	2906	6.80%	326	3.10%	233	3.90%	12028	5.60%
TL	Tagalog	2	0.00%	1	0.00%		0.00%	11	0.00%		0.00%		0.00%	14	0.00%
UR	Urdu	9	0.00%	47	0.10%		0.00%	24	0.10%		0.00%		0.00%	80	0.00%
VT	Vietnamese	6	0.00%	3	0.00%	2	0.00%	18	0.00%		0.00%	1	0.00%	30	0.00%
XX	Other	72	0.10%	162	0.20%	44	0.20%	173	0.40%	16	0.20%	3	0.00%	470	0.20%
YI	Yiddish		0.00%	10	0.00%		0.00%		0.00%		0.00%		0.00%	10	0.00%
		3216	5.20%	3632	5.50%	1435	5.00%	2104	4.90%	329	3.20%	296	4.90%	11012	5.10%
Total		61857	100.00%	65471	100.00%	28824	100.00%	42940	100.00%	10359	100.00%	6002	100.00%	215453	100.00%

Note:\* These were the children, parents, perpetrators, or other family members of a child protective case.

Prepared by The Office of Research & Evaluation - Management Analysis & Reporting Unit

Data Source: Connections as of 2/24/06.

**CHART****B: PRIMARY LANGUAGE OF FAMILIES RECEIVING CHILD CARE SERVICES  
(SUMMARY OF ACCIS LANGUAGE & BOROUGH COUNTS AS OF 3/6/06)**

CODE	#	%	DESCRIPTION	MN	BK	BX	QN	SI	Total
AL	21	0.05%	Albanian	3	12	5	1	0	21
AR	21	0.05%	Arabic	3	6	4	7	1	21
CC	342	0.77%	Chinese/Cantonese	153	148	5	31	5	342
CM	77	0.17%	Chinese/Mandarin	31	20	1	25	0	77
CO	341	0.77%	Chinese/Other	165	145	5	23	3	341
EN	34,888	78.60%	English	4,520	16,288	6,641	6,489	950	34,888
FC	71	0.16%	French/Creole	4	44	5	18	0	71
FR	248	0.56%	French	64	75	90	18	1	248
GK	0	0.00%	Greek	0	0	0	0	0	0
GR	2	0.00%	German	1	0	1	0	0	2
HB	57	0.13%	Hebrew	1	41	3	12	0	57
IH	22	0.05%	Indian/Hindi	5	7	3	7	0	22
IT	1	0.00%	Italian	0	0	1	0	0	1
IU	0	0.00%	Indian/Updu	0	0	0	0	0	0
JP	2	0.00%	Japanese	1	1	0	0	0	2
KH	2	0.00%	Khmer (Cambodian)	0	1	0	0	1	2
KO	3	0.01%	Korean	0	2	0	1	0	3
LA	0	0.00%	Laotian	0	0	0	0	0	0
OT	140	0.32%	Other	17	17	86	20	0	140

PO	6	0.01%	Polish	1	2	0	3	0	6
RU	449	1.01%	Russian	0	133	3	304	9	449
SL	2	0.00%	Sign Language	0	1	1	0	0	2
SP	7,532	16.97%	Spanish	1,606	1,577	3,619	686	44	7,532
TH	3	0.01%	Thai	1	0	0	2	0	3
VI	2	0.00%	Vietnamese	0	1	0	0	1	2
YI	152	0.34%	Yiddish	0	151	0	1	0	152
Total:	44,384	100.00%	<b>Total:</b>	6,576	18,672	10,473	7,648	1,015	44,384
			<b>Borough Percentages</b>	14.82%	42.07%	23.60%	17.23%	2.29%	100.00%