

2018 Language Access Implementation Plan: The Human Resources Administration (HRA)

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I. Agency Mission and Background

a. Language Access Coordinator

The Language Access Coordinator for the Department of Social Services, including the Human Resources Administration, is Marah Rhoades, Deputy Commissioner, Office of Advocacy and Outreach.

b. Programs and Services Offered

Serving more than 3 million New Yorkers annually, the New York City Human Resources Administration (HRA) provides economic support and social services to families and individuals through the administration of major benefit programs including Cash Assistance, Supplemental Nutritional Assistance Program benefits (food stamps), Medicaid, and Child Support Services. HRA also provides homelessness prevention, educational, vocational and employment services, assistance for persons with disabilities, services for immigrants, civil legal aid and disaster relief. For the most vulnerable, it provides HIV/AIDS Services, Adult Protective Services, Home Care and programs for survivors of domestic violence. HRA promotes equity for New Yorkers through its commitment to services that fight poverty and income inequality, prevent homelessness and promote employment. HRA increases economic security by facilitating access to benefits and to employment and educational programs. Almost 650,000 of the New York City residents that HRA served in 2016 were limited English proficient (LEP). In 2017, the administrative units of the NYC Human Resources Administration (HRA) and the Department of Homeless Services (DHS) merged to create an integrated services model that provides more effective, seamless client services under the Department of Social Services (DSS). By working together under shared leadership and a unifying structure, we are doing better work for more New Yorkers in need. This includes sharing resources for providing free and confidential language services, managed by the Office of Refugee and Immigrant Affairs (ORIA).

a. Programs and Services Offered

Temporary Cash Assistance

Eligible families may receive federally funded cash assistance or state funded benefits at HRA Job Centers throughout the five boroughs. Parents who do not qualify for cash assistance services due to immigration status or other factors may apply on behalf of their children.

Supplemental Nutrition Assistance Program

The Supplemental Nutrition Assistance Program (SNAP), formerly known as food stamps, provides assistance to low-income New Yorkers to increase their ability to purchase food. The program provides benefits through an electronic benefits card that can be used like a debit card at participating grocery stores, supermarkets, most farmers' markets, and some Green Carts.

Parents who do not qualify for SNAP benefits may be able to apply for and receive services on behalf on their children.

Emergency Food Assistance Program

This program supports more than 550 community kitchens and food pantries throughout the City. These are places where people can get a nutritious meal or a supply of foodstuffs at no cost, regardless of immigration status. For a list of programs, locations and times, please call 311.

Homelessness Prevention

The Homelessness Prevention Administration (HPA) works with the NYC Department of Homeless Services (DHS), the NYC Housing Authority (NYCHA) and many other organizations and City agencies to prevent homelessness and assist families and individuals in need of maintaining stable, affordable housing in their communities.

Health Insurance Coverage

HRA's Medical Assistance Program (MAP) offers free and low-cost health insurance for low-income New Yorkers. MAP determines eligibility based upon income and resource levels for each of the health insurance programs that they administer.

Individuals and families can qualify for public health insurance even if they have income, own a house, own a car, have a bank account or receive private health insurance. Pregnant women and children may qualify for health insurance without regard to immigration status. All individuals, including those with no immigration status, can apply for emergency Medicaid for emergency, life-sustaining medical care.

Adult Protective Services

Adult Protective Services (APS) provides services and support for physically and/or mentally impaired adults who are at risk of harm. The program works to enable these individuals to live independently and safely within their homes and communities. Prospective clients may be referred by anyone. There is an APS office in each borough.

APS is available to persons 18 years of age and older without regard to income, who:

- Are mentally and/or physically impaired; **and**
- Due to these impairments, are unable to manage their own resources, carry out the activities of daily living, or protect themselves from abuse, neglect, exploitation or other hazardous situations without assistance from others; **and**
- Have no one available who is willing and able to assist them responsibly.

Home Care/Long-Term Care Services Program

The Home Care Services Program (HCSP) provides access to, or authorizes services for a variety of Medicaid-funded long-term care services (LTC) designed to help eligible elderly persons or individuals with disabilities remain safely at home, rather than in a nursing home or other institution.

Long-term care services (LTC) refers to the wide range of in-home, community-based, and institutional services and programs that are designed to help elderly persons and individuals with disabilities of all ages. These services can be medical and non-medical and can help people with activities of daily living (ADLs) such as dressing, bathing and using the bathroom, and instrumental activities of daily living (IADLs) such as shopping, cleaning, laundry, and preparing meals.

Eligibility for Medicaid-funded home care programs varies among programs, but all programs require that the applicant be Medicaid-eligible.

HIV/AIDS Services

The HIV/AIDS Services Administration's (HASA) mission is to expedite access to the essential benefits and social services, including case management, to eligible persons with AIDS or HIV and their families. Staff assists eligible clients in obtaining adequate housing, medical care and other services necessary to allow them to manage their lives with the highest level of self-reliance and dignity. Some HASA services are available without regard to immigration status.

Domestic Violence Support Services

The Office of Domestic Violence (ODV) oversees the largest network of domestic violence services in the country. These state-mandated shelter and community-based programs provide prevention and intervention services, crisis counseling, advocacy and legal services to help families and individuals impacted by domestic violence. All programs are provided without regard to immigration status.

Child Support Services

The Office of Child Support Services (OCSS) puts children first by helping parents provide for the economic and social well-being, health and stability of their children. OCSS serves custodial parents and guardians regardless of income and immigration status. Services include locating the noncustodial parent, establishing paternity, child support and medical support orders, and collecting and enforcing those orders. OCSS also assists noncustodial parents with modifying their child support orders, providing assistance in paying off child support arrears and providing employment assistance and referrals to services like mediation.

Home Energy Assistance Program

The Home Energy Assistance Program (HEAP) helps low-income homeowners and renters pay regular and emergency heating costs, including heating fuel, equipment and repairs. HEAP may be able to help even if heat and utilities are included in the rent or the applicant lives in subsidized housing.

Customized Assistance Services

Customized Assistance Services (CAS) helps HRA clients with health and/or mental health problems reach the highest attainable level of functioning and self-sufficiency by providing comprehensive, integrated, individualized clinical and support services.

CAS provides clinical expertise, recommendations, and direction to HRA in the fields of health, mental health, substance use and vocational rehabilitation. CAS staff provides psychiatric evaluation and crisis intervention services, housing eligibility services and assistance in obtaining federal disability benefits. CAS manages contracts that serve individuals and families with medical, mental health, and/or substance use disorders. CAS programs provide clinically focused case management and utilize sophisticated clinical tracking and reporting systems.

Investigation, Revenue and Enforcement Administration

The integrity of HRA programs is maintained by the Investigation, Revenue and Enforcement Administration (IREA). IREA confirms eligibility for first time applicants and active public assistance clients, conducts investigations of individuals and organized groups, and deters Cash Assistance fraud.

IDNYC

HRA, in partnership with the Mayor's Office of Immigrant Affairs (MOIA) and the Mayor's Office of Operations, administers the IDNYC program. For details on the language access services provided by IDNYC, please see IDNYC's [Language and Disability Access Plan](#).

II. Agency Language Access Policy and Goals

a. HRA's policies around language access

In our city of immigrants, HRA and DSS are committed to providing equal access for all New Yorkers, regardless of immigration status or language preference.

One-third of HRA's clients are limited English proficient (LEP). Collectively, our clients speak more than 90 languages. Over the years, we have provided language services by using our bilingual staff; increasing the use of our telephone interpretation service; providing translated documents and, when the need arises, using our in-person, video and sign language interpretation contracts.

While each HRA program has its own language access policy that is tailored to the client services provided, all of the Agency's language access procedures and policies reflect the same core principles:

1. All Agency employees are required to work with clients in the language of the client's¹ preference. This is primarily accomplished through the use of bilingual staff and professional, contracted interpretation services.
2. All documents or notices that are produced by the Agency and will be seen by clients must be available in the following eleven languages in addition to English: Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

b. Overall goals of HRA's Language Access Implementation Plan

HRA serves a uniquely diverse population. In keeping with the Agency's commitment to providing benefits and services to all eligible applicants, this plan ensures that language will not be an obstacle to receiving services. The goal of this plan is to ensure that all eligible applicants and recipients receive the appropriate benefits without undue delay or difficulty. The application for benefits should take no longer for LEP clients than it does for English proficient clients. All of the support services the Agency provides should be available to all clients, regardless of language.

The goal of this Language Access Implementation Plan is to inform HRA clients, the Mayor's Office of Immigrant Affairs (MOIA) and the New York City Council about the language services that HRA provides and how they are provided.

¹ Throughout this plan, the expression "client" is used to refer to clients, applicants, consumers or members of the public.

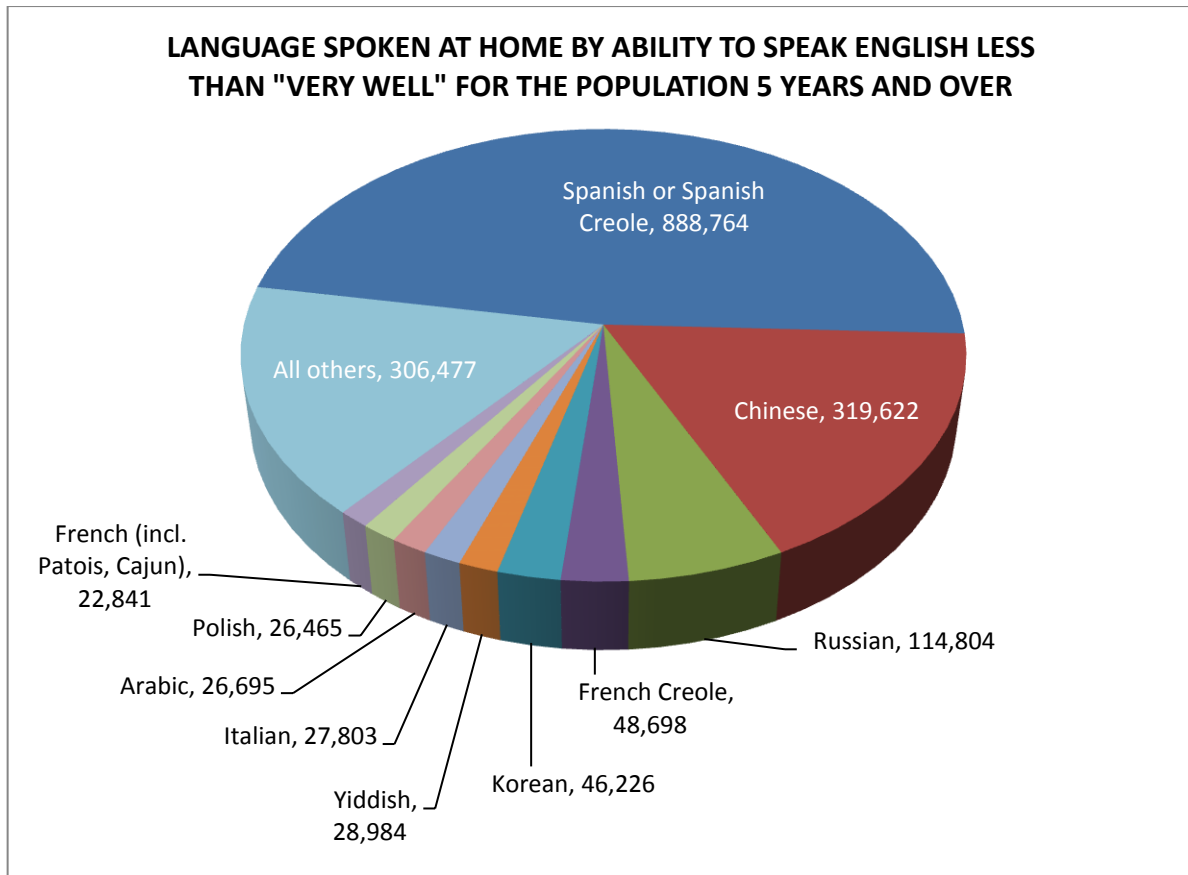
III. LEP Population Assessment

a. U.S. Department of Justice “Four Factor Analysis”

Factor 1 examines the number or proportion of LEP persons eligible to be served or likely to be encountered by the program. HRA’s service area includes all of New York City.

According to the U.S. Census Bureau², New York City residents who speak English less than “very well” are most likely to speak: Spanish, Chinese, Russian, French Creole, Korean, or Yiddish (see Figure 1).

Figure 1

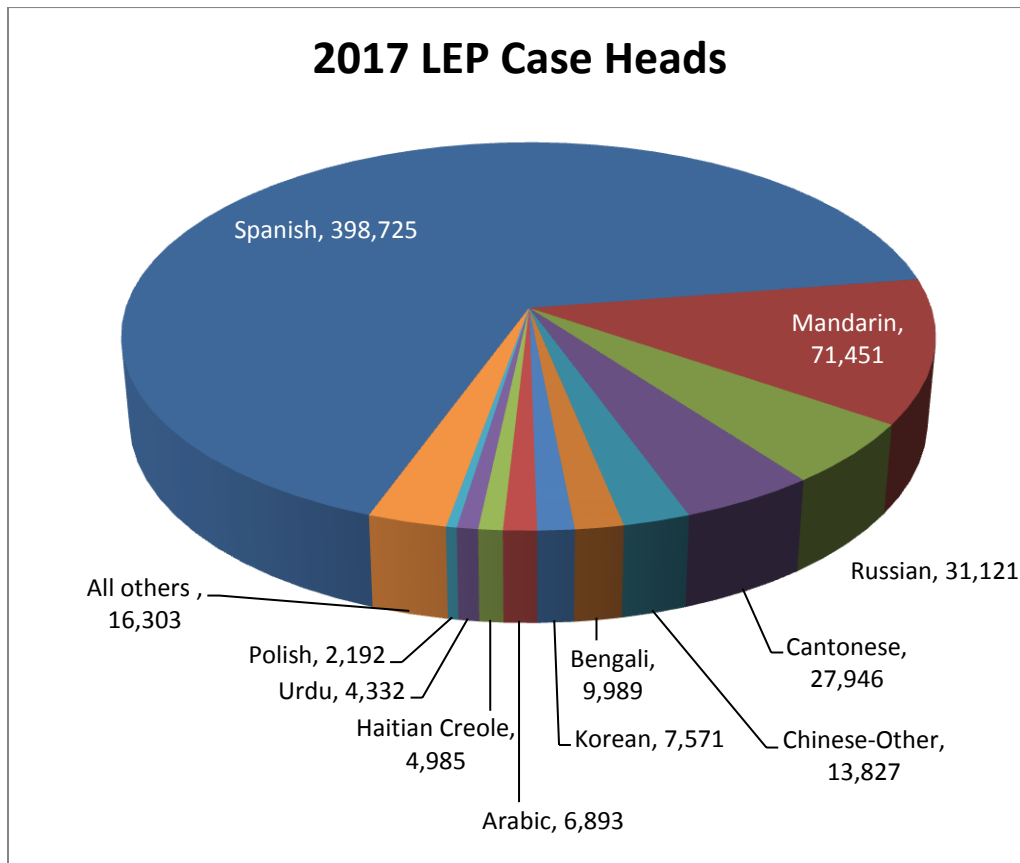


² 2011-2015 5-Year American Community Survey

Factor 2 is an analysis of the frequency with which LEP individuals come in contact with the program.

In 2017, HRA served 1.9 million unique cases. One-third (32%) of HRA's client population is limited English proficient. The top nine non-English languages spoken by HRA clients are: Spanish, Chinese dialects, including Mandarin, Cantonese and other, Russian, Bengali, Korean, Arabic, Haitian Creole, Urdu and Polish [see Figure 2].

Figure 2



HRA primarily meets the needs of LEP clients through the use of bilingual staff, telephonic interpretation (available in more than 200 languages), on-site interpretation and video interpretation for spoken languages and sign language. With these tools, HRA staff is expected to communicate with every client in his or her language of preference.

The Agency also provides written documents in the eleven³ city-wide languages mandated by Local Law 30 (Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu). Together, these languages represent 99% of the Agency's LEP client population.

Factor 3 requires an explanation of the nature and importance of the program, activity, or services provided by the program to people's lives.

HRA provides a variety of social services and economic assistance to eligible individuals and families. The goal of these services is to enable these New Yorkers to lead independent lives. When an applicant/client calls or visits HRA's offices, language must not be a barrier to the receipt of appropriate services. This plan reflects HRA's commitment to providing language access services and meeting the following over-arching goals:

- To ensure that language is not a barrier to Agency services;
- To ensure that all applicants and clients have equal access to the services for which they are eligible, regardless of the level of their English proficiency;
- To inform all HRA applicants and clients that free interpretation services are always available; and
- To train front-line staff on the importance of ensuring access to free interpretation services for all LEP clients.

Factor 4 requires a description of the resources available to the Agency and costs.

HRA uses bilingual staff, telephonic interpretation and, when appropriate, video or on-site interpretation to speak with clients in their preferred language.

In 2017, HRA provided written notices and documentation in their preferred language to clients who read Arabic, Bengali, Simplified or Traditional Chinese, Haitian Creole, Korean, Russian, Spanish or Urdu. By July 2019, all HRA produced documents will also be available in French and Polish. As per Agency policy, when a client notifies the Agency, either in-person or by calling Infoline, that they do not understand, for any reason, a document that has been sent to them, it is the staff member's responsibility to read and/or summarize the notice for them in a language that they understand.

HRA utilizes outside vendors to provide written translation, on-site interpretation, telephonic interpretation, sign language interpretation and bilingual skills testing. We provide these services to our clients under the citywide language service contracts provided through the Department of Citywide Administrative Services (DCAS).

³ HRA recognizes that Local Law 30 lists ten designated city-wide languages, but the law does not designate which form of Chinese characters should be provided. Given the size of HRA's Chinese language population, the Agency has opted to provide all notices in both styles of characters, implementing the Local Law 30 mandate as eleven languages rather than ten.

Type of Service	Vendor	2017 Instances	2017 Expenditures
Telephonic Interpretation	Voiance Language, LLC.	279,389	\$1,895,715
On-Site Interpretation (excluding sign language)	Geneva Worldwide, Inc.	3,235	\$216,627
Sign Language Interpretation (video and in-person)	Accurate Communication, Inc.	599	\$87,150
Written Translation	Language Line Solutions, Inc.	2,903	\$1,448,438
Bilingual Skills Testing	LM Language Services	11	\$1,284
Total Costs			\$3,649,214

As described in more detail below, the Agency also conducts regular staff trainings, updates procedures to improve services to LEP clients, posts signage at all sites to notify clients of their right to free interpretation services, and utilizes a variety of language access tools to help workers and clients identify language needs.

b. Language Access Needs of the Agency

HRA fully understands that effective communication in any language is essential for clients in accessing our crucial services and programs. The Agency is firmly committed ensuring that all New Yorkers, no matter what their language of preference, can apply for and access all of the Agency’s benefits and services. While serving more than 500,000 limited English proficient New Yorkers per year requires a significant commitment, it is a commitment that the Agency continues to make.

HRA provides telephonic interpretation services in more than 200 languages, which covers more than 99% of Agency clients. Given that the eleven city-wide designated languages represent more than 99% of the Agency’s clients, we do not anticipate the need to increase our translation languages in the immediate future.

IV. Provision of Language Access Services

a. In-Person Interactions

All HRA staff are required to work with every client in his or her preferred language. To do this, staff must first correctly identify a client's language. In some locations, clients use a self-service check-in process to self-identify their language of preference. In other locations, staff use a combination of tools to correctly identify a client's language.

Once a client's preferred language is identified, there are five ways for staff to meet the preferred language mandate: they can use their own bilingual skills, telephonic interpretation services, video interpretation services, on-site interpretation services or the client can provide his or her own interpreter, as long as the individual is over the age of eighteen.

1) Using a Kiosk to Self-Identify Language Needs

At some Job and SNAP centers, clients use self-service check-in kiosks to identify their reason for being in the center and get an automatically generated ticket number. The first screen on the kiosk asks clients to self-identify their language of preference. The current options are English, Spanish, Arabic, Korean, Chinese (Traditional), Russian or Haitian Creole. Once a client has selected an option, the entire check-in process is conducted in that language.



The self-service check-in kiosks will be updated to reflect all eleven city-wide designated languages by December of 2018.

Once the check-in process is complete, all clients are given a ticket which tells them which floor/area to report to and provides a ticket number. Every ticket also includes the message "All are welcome and have a right to apply for HRA benefits. You do not need a social security number to apply. You have a right to free language services. If you have a complaint, ask to speak with a supervisor or call 311." This message is printed on the ticket in English, Spanish, Traditional and Simplified Chinese, Russian, Bengali,



Human Resources Administration
Department of Social Services

You Have a Right to Free Interpretation Services

We have free interpretation services available. Please tell a worker if you want to speak with us in a language other than English or in sign language. In a Center, you can simply show a worker the "I Speak" card below. If you have a question, comment or complaint about the interpretation services provided, please call 311. Filing a complaint will not affect your case.

Usted tiene derecho a recibir servicios de interpretación gratuitos

Contamos con servicios de interpretación gratuitos. Si desea hablar con nosotros en un idioma distinto al inglés o en lenguaje de señas, hágase saber a un empleado. Si está en un Centro, simplemente muéstrele a un empleado la tarjeta "I Speak" que aparece a continuación. Si tiene alguna pregunta, comentario o queja acerca de los servicios de interpretación que brindamos, llame al 311. La presentación de una queja no tendrá incidencia sobre su caso.

您有權利使用免費口譯服務

我們提供免費的口譯服務。如果您希望用英語以外的語言或手語和我們溝通，請告訴我們的工作人員。在中心裡，您只要向工作人員出示底下的「我說」(I Speak) 卡就可以了。如果您對我們提供的口譯服務有疑問、評論、或申訴，請致電 311。提交申訴將不會影響您的個案。

Вы имеете право на бесплатные услуги устного перевода

Мы предоставляем вам бесплатные услуги устного перевода. Сообщите сотруднику, если вы хотите общаться с нами не на английском, а на другом языке или на языке жестов. В центре вы можете просто предъявить сотруднику карту I Speak, представленную ниже. С вопросами, отзывами и жалобами в отношении предоставленных услуг устного перевода звоните по номеру 311. Подача жалобы не повлияет на рассмотрение вашего дела.

무료 통역 서비스를 받을 권리가 있습니다

당국은 무료 통역 서비스를 제공해 드립니다. 영어 이외의 언어 또는 수화로 상담하시려는 경우 직원에게 말씀하시기 바랍니다. 센터에 방문하시는 경우 아래에 있는 "I Speak" 카드를 직원에게 보여주시면 됩니다. 제공되는 통역 서비스와 관련된 문의사항, 의견 또는 불만사항이 있는 경우 311 번호로 전화해 주십시오. 불만 제기는 귀하의 케이스에 영향을 주지 않습니다.

لديك الحق في الحصول على خدمات الترجمة الفورية المجانية

ترجّد لحدنا خدمات ترجمة فورية مجانية متاحة لكم، من فضلك أخبر أحد الموظفين إذا رغبت التحدث معنا بلغة أخرى غير اللغة الإنجليزية، أو في لغة الإشارة في المركز، تفضلنا أن تثير البطاقة المسمى "I Speak" الموجودة أثناء إلى أحد الموظفين. إذا كان لديك سؤال أو تعليق أو شكوى بشأن خدمات الترجمة الفورية المجانية، يرجى الاتصال بالرقم 311. إن يأتى تقديم شكوى على خدمتنا.

Ou Gen yon Dwa pou Resevwa Sèvis Entèpretasyon Gratis

Nou gen sèvis entèpretasyon gratis ki disponib. Tanpri fè yon anplwaye konnen si ou vle pale avèk nou nan yon lang ki pa Angle oswa nan yon langaj sèn. Nan yon Sant, ou kapab senpleman montre yon anplwaye kat "I Speak" (Mwen Pale) ki anba la a. Si ou gen kesyon, yon kòmantè oswa yon plent sou sèvis entèpretasyon nou bay yo, tanpri rele 311. Si ou fè yon plent sa p ap gen konsekans sou dosye ou.



I speak ...

Attention Agency employees: Please call an interpreter. This customer requires language assistance. See reverse side for language.

Arabic / **أحتاج إلى خدمات الترجمة الفورية مجانية**

Haitian Creole / **Mwen bezwen sèvis entèpretasyon gratis.**

Korean / **부끄 통역 서비스가 필요합니다.**

Chinese / **我需免費的口譯服務。**

Russian / **Мне нужны бесплатные услуги перевода.**

Spanish / **Necesito servicios de interpretación gratis.**

Other / _____

HRA-125 (MLF)
rev. 11/15

For clients who do not read or speak any of the above languages or who cannot use the self-service kiosk for any reason, a staff member is always available to assist. Staff members have access to telephonic interpretation or other accessibility tools to help clients with the check-in process.

2) Staff Tools for Identifying a Client’s Language of Preference

All direct interactions between HRA staff and clients begin with an offer of free language services. If a client accepts the offer of language services, the second step is to identify the client’s language of preference. Many HRA clients self-identify their preferred language. Others are identified by the Agency’s diverse bilingual staff. In addition, staff in our offices can use the Language Card, the free interpretation services notice or our telephonic interpretation services vendor to identify a client’s preferred language.

The Language Card

The Language Card is a folded card that contains the phrase: “Do you speak [name of the language]? Please be seated. I will call an interpreter for you.” This phrase appears in the following languages: English, Albanian, Arabic, Bengali, Bosnian, Cantonese (traditional characters), Mandarin (traditional characters), Haitian Creole, French, Greek, Hebrew, Hindi, Italian, Khmer, Korean, Polish, Russian, Spanish, Ukrainian, Urdu, Vietnamese, and Yiddish. It also includes the symbol for deaf/hard-of-hearing services. As of 2016, the card is available in two sizes, 11”x17” and 5”x7”.

IF YOU DO NOT KNOW THE LANGUAGE OF THE PERSON WHO WANTS YOUR HELP, USE THIS CARD. THE PERSON CAN POINT TO THE LANGUAGE NEEDED AND YOU CAN ARRANGE FOR AN INTERPRETER.					
English	"Do you speak..."	"Please be seated. I will call an interpreter for you."	Hindi	क्या आप हिन्दी बोलते हैं?	कृपया बैठ जाइए। मैं आपके लिए दुभाषिये की व्यवस्था करूंगा / करूंगी।
Albanian	Flisni shqip?	Uluni ju lutem. Po shkoj të thërras një përkthyes për ju.	Italian	Parla italiano?	Prego, si accomodi e attenda mentre Le chiamo un interprete.

Notice of Free Language Interpretation

As mandated by Local Law 73, all HRA programs include an 8.5"x 11" notice of free interpretation services in their application and re-certification packets. As discussed above, by July of 2018, this notice will be in Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

Use of Telephonic Interpretation Services to Identify a Client's Preferred Language

If clients do not identify their preferred language on the Language Card or the Notice of Free Interpretation Services, it may be because the client speaks another language or does not read in any language. At that point, staff can call telephonic interpretation services and ask for a Client Services Representative. The representative can work with the staff member to identify the client's language using various linguists.

3) Telephonic Interpretation Services

Most frequently, staff use telephonic interpretation services to communicate with clients who prefer to use a language other than English. In 2016, HRA provided 218,812 instances of telephonic interpretation services. That is an average of 842 calls per business day and an increase of 27% over 2015. In 2017, HRA averaged more than 1,000 telephonic interpretation calls per day.

ORIA confirms the quality of the Agency's telephonic interpretation services (which are available in more than 180 languages) by tracking complaints and meeting regularly with staff and outside advocates. Complaints about interpreters or interpretation services are forwarded to our professional services vendor, who, when a specific call can be identified, has management staff listen to and review the call and take appropriate action. When complaints are more general, the vendor can create detailed reports of wait times, the number of calls and the number of interpreters available during a specific period.

4) Bilingual Staff

DSS (which includes both HRA and DHS) employs more than 2,100 individuals who speak a language other than English. Collectively, our staff speaks 128 languages.

DSS's Bilingual Staff (as of 5/15/2017)

Language	Number of bilingual staff*
Spanish	1,303
Russian	406
Yoruba	211
French	203
Haitian Creole	197
Cantonese	137
Mandarin	123
Bengali	112
Hindi	101
Ukrainian	85
Urdu	58
Igbo	49
Arabic	44
Ibo	35
Malayalam	33
Nigerian Pidgin English	30
Punjabi	30
Hebrew	27
Polish	25
Italian	24
Tagalog	24
Toishanese	20
German	19
Portuguese	19
Gujarati	18
Vietnamese	16
Edo	15
Korean	15
Greek	12
Pidgin English	12
Tamil	12
Yiddish	12
American Sign Language (ASL)	11
Patois	11
All others (94 languages)	277
TOTAL	3,726

*bilingual staff members speaking more than one language are counted twice.

5) Video Interpretation Services

In specific instances, HRA can provide video interpretation services for both deaf/hard-of-hearing clients or for limited English proficient clients.

All Family Independence Administration (FIA) SNAP and Job Centers are equipped with video technology, including cameras and dual monitors, to provide video interpretation services for deaf/hard-of-hearing clients. Without this technology, deaf/hard-of-hearing clients would have to either pre-schedule appointments or wait two hours for an on-site sign language interpreter to arrive. Using video technology, an interpreter can be arranged in only 20 minutes.

Video interpretation services for sign language services will be expanded to all Office of Child Support Services (OCSS) locations by September of 2018.

HRA is also continuing a pilot to use video technology to provide interpretation services for limited English proficient New Yorkers. This pilot is available at SNAP and Job Centers in Queens and uses tablets to connect with interpretation services. Staff from multiple program areas continue to work together to determine the best service model based on the pilot experience.

6) On-site Interpretation Services (in HRA offices)

HRA uses on-site interpretation for sign language interpretation services whenever it is requested by a client or if a specific location does not have access to video services. The Agency is also able to provide on-site interpretation services for limited English proficient clients in our offices if telephonic interpretation services are not available or practical. The two most common reasons for using on-site interpretation services for limited English speaking clients would be because a client does not hear well enough to use the phone (most commonly because of age related hearing loss) or if a particularly rare language is more readily available through our on-site interpretation services vendor than our telephonic interpretation services vendor.

7) Client Provided Interpretation Services

In most programs, clients have the right to bring friends, family or confidants with them to HRA interviews/meetings. (Notable exceptions to this rule are interviews with the Office of Domestic Violence, Adult Protective Services and the Bureau of Fraud Investigation.) In these instances, clients may choose to allow their family or friends to provide interpretation services on their behalf, if the suggested interpreter is over the age of eighteen. In all instances, if a client suggests using a friend or family member as an interpreter, Agency staff reiterate that free and confidential language services are available, but will ultimately allow the client to make the decision as to how he/she wishes to communicate.

b. Over-the-Phone Interactions

HRA has approximately 30 public-facing phone numbers, but the vast majority of callers contact the Agency through two numbers – Infoline (the Agency’s call center) and the SNAP Telephone Interview Processing (TIPS) line, which handles scheduled SNAP application interviews and On-Demand SNAP recertification interviews.

Infoline receives more than 4 million calls per year. The initial Interactive Voice Response System (IVRS) allows callers to continue in Spanish, Mandarin, Russian or Vietnamese. Callers who select these options will be automatically routed to a bilingual call agent, unless the wait time is significantly longer than in the general queue. (When the wait time for a bilingual call agent reaches a set length, calls are routed to the next available agent with the expectation that the agent will use telephonic interpretation services to speak with the caller.)

Clients who are recertifying for SNAP benefits can now call SNAP On-Demand, rather than waiting for the Agency to call them for a telephone interview. The On-Demand line has voice recognition in English and Spanish and touch-tone capability in Arabic, Bengali, Mandarin, Cantonese, Haitian Creole, Korean, Russian and Urdu. In addition, there is a static message informing callers to select a specific option and ask for an interpreter in Polish, Albanian, French, Urdu, Hindi, Vietnamese or Greek. Together, these 16 languages represent more than 99% of the Agency’s SNAP clients.

Call agents at all of the Agency’s public phone numbers, including both Infoline and the SNAP TIPS line, have access to telephonic interpretation services in more than 200 languages. If callers to any of these numbers are unable to identify their preferred language in English, agents can contact our telephonic interpretation services and speak with a Client Services Representative who is specifically trained to help identify the language of the caller.

c. Field and/or Home Visits

When clients are known to the Agency and already have a case record, staff can check the appropriate program database to determine the client’s language preference.

When applicants or members of the public are new to the Agency and, therefore, do not have a case record, staff may be able to check either the applicant’s request for a home visit or the referral to the Agency for a reference to the client’s language needs.

Once a staff member arrives in the field, the client may identify his/her primary language in English or the staff member may use the Language Card to identify the client’s language. If the client does not speak one of the 19 languages listed on the Language Card, or cannot point to the appropriate choice, field staff can work with our telephonic interpretation services vendor in the same manner as described above.

Once the language of the client has been determined, staff have the option of using telephonic interpretation services or requesting an on-site interpreter. In 2017, staff requested on-site interpretation for spoken languages 3,235 times or more than 60 times per week. The majority of these requests were for the Adult Protective Services program, but requests were also made by the Family Independence Administration, the HIV/AIDS Services Administration and the Medicaid Home Care program.

Staff can also request sign language interpretation services for home/field visits.

d. Hearings

HRA holds hearings in connection with its rental assistance programs. When clients receive the notification of a decision on their case, the form includes a request for a hearing. (The notification is currently available in nine languages. By July of 2018, it will be in the designated eleven languages.) If an individual requests a hearing, they are contacted by Agency staff, who have access to interpretation services, for scheduling purposes. During that call, clients are asked whether they would like interpretation services for their hearing. If clients request interpretation services, onsite interpreters are used.

If individuals do not request interpretation services in advance, hearing staff use the same free interpretation posters and tools as other Agency staff to determine the individual's primary language. If these tools do not contain enough languages or do not allow the client to identify their language, hearing staff also have access to telephonic interpretation services and can enlist the support of a Client Services Representative.

e. Public Events (forums, town halls, etc.)

HRA participates in two types of public events: public hearings and community events.

Where required by law, HRA holds public hearings before implementing or changing certain program rules. Notifications for these hearings are made according to the legal requirements of that specific program. As a part of the notification, individuals are informed that they can contact the Agency to request interpretation services at the hearing. Even if not requested, HRA provides on-site, simultaneous interpretation services at every public hearing. When individuals sign-in to attend the hearing, they are specifically asked if they would like to use these language services.

Agency leaders and outreach staff are periodically asked to attend/present at public forums and events. In these instances, the need for interpretation services is usually determined by the group or community-based organization that is hosting the event. When asked, HRA has assisted other City Agencies and community-based organizations with on-site interpretation services.

f. Public Notices and Mailings

For many years, HRA has been in full compliance with Local Law 73 of 2003, which requires the translation of agency-developed documents into six languages (Arabic, Chinese⁴, Haitian Creole, Korean, Russian, and Spanish).

In 2015, on its own volition, the Agency opted to move well beyond the requirements of LL73. Rather than translating agency-developed documents into six languages, the Agency began to translate all client-facing and public-facing documents into nine languages. (Bengali, Simplified Chinese, and Urdu were added.) The Agency established an expansive Agency-wide translation policy that requires that all Agency-developed materials which will be distributed to clients or the public (including notices, forms and informational materials) be translated into eleven languages: Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu.

In 2017, the City Council passed Local Law 30, which requires the translation of certain documents into ten languages. At that time, the Agency already had its client-facing documents available in nine languages. Thus, French and Polish were added to the languages into which HRA forms were already being translated.⁵

Additionally, HRA conducted a review of all forms and notices that are distributed to the clients or the public to confirm that they comply with the plain language principles set forth in Local Law 30.

Because HRA serves such a large number of clients (more than 3 million annually), almost all Agency forms and notices are automatically generated by HRA systems. For example, automated systems search client records and automatically mail appropriate notices to clients who need to submit documentation, update their records, schedule an appointment, etc. When the Agency's primary automated systems were put in place, they were created to accommodate ten languages. In 2017 and 2018, the Agency invested resources to upgrade these systems to allow them to generate documents into more languages.

Now that the Agency's automated systems have been upgraded, the Agency has begun the labor-intensive process of programming documents into an additional two languages (Polish and French) pursuant to Local Law 30. Additionally, for any document that is revised or reworked for any reason,—for example, when plain language edits are made—the Agency must first have the new, updated form translated into all twelve languages and then separately have each translated version reprogrammed so it is available for automated generation. This was the case for many of the Agency's more than 1,600 forms. Currently, approximately 35% of forms and notices that are distributed to the public have been translated into all twelve languages and are available for automated generation.

By June of 2018, all of the Agency's documents will be translated into twelve languages. Many of those documents will be available to clients or the public immediately. Others, specifically those that need to be programmed in order to be mailed automatically, will be made available on a rolling schedule. The

⁴ HRA provided translation into Traditional Chinese characters.

⁵ In 2017, HRA provided service to 2,192 Polish- and 1,407 French-speaking households.

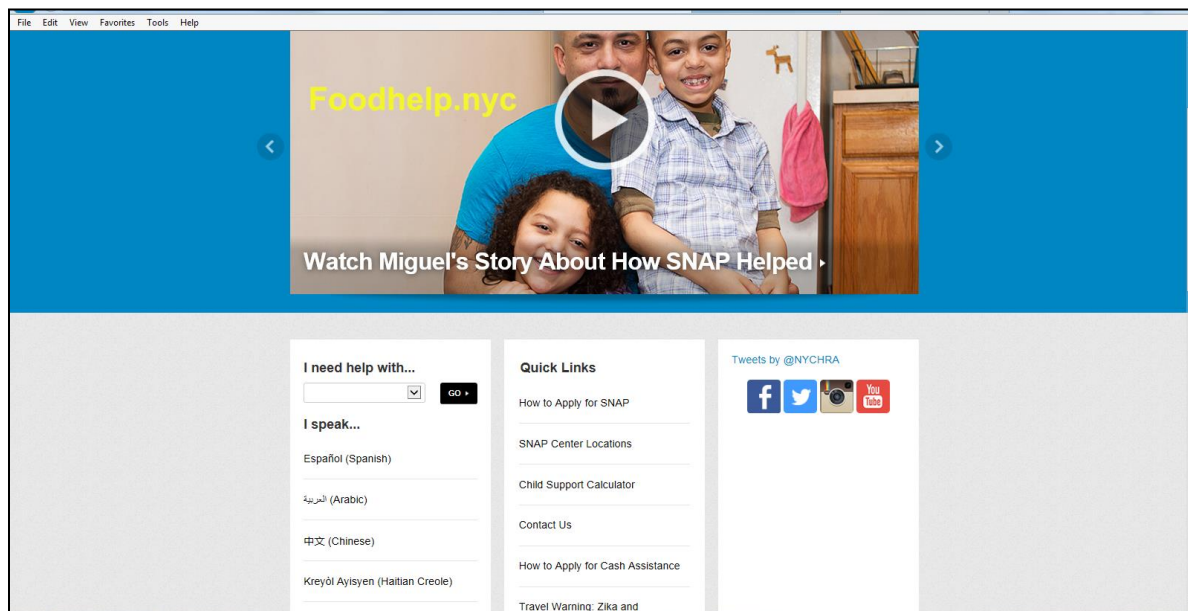
Agency expects that every document or notice which is seen by clients or the public will be mailed out and/or be available in twelve languages by July 2019.

HRA's Office of Policies, Procedures and Training (OPPT) will be responsible for tracking updated versions of forms and ensuring that the correct, up-to-date form, in the correct language is delivered to each client.

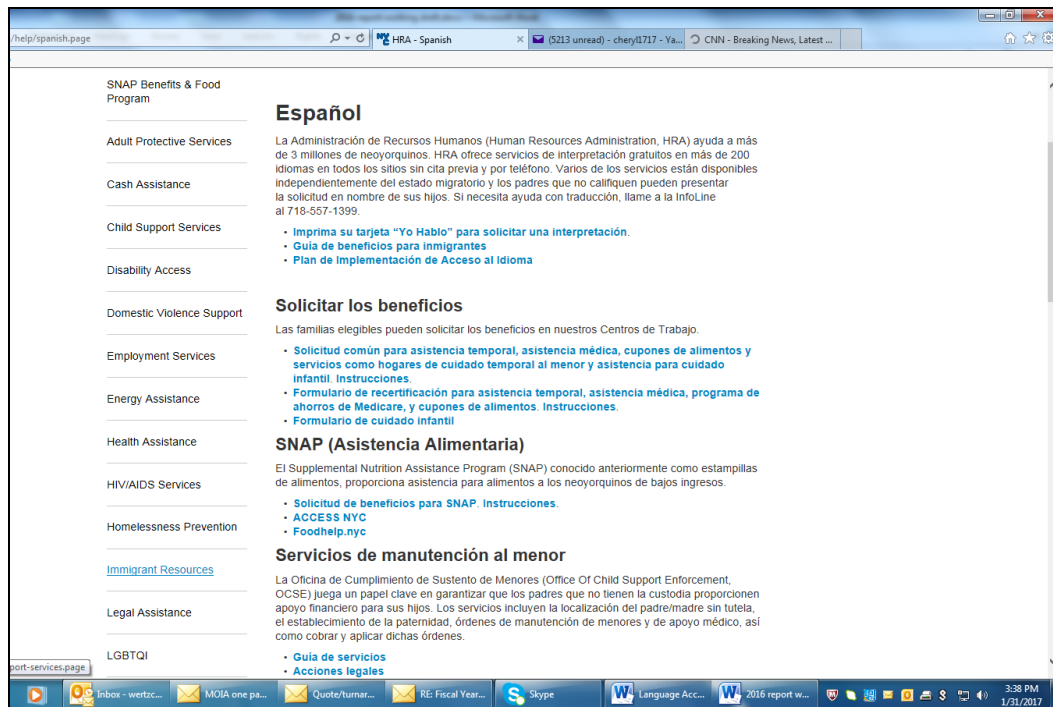
HRA's documents are all professionally translated by certified translators at Language Line Solutions. While Language Line conducts its own quality assurance check, HRA also seeks feedback from the public and stakeholders on the quality of our written translations. When needed, HRA relies on volunteers from the City's Language Bank to review translated documents.

g. Agency Web Site/Mobile Applications

HRA redesigned its public web site (www.nyc.gov/hra) in 2015. Directly under the "hero," HRA's home page divides into three columns. The first column begins "I speak..." and then lists Spanish, Arabic, Chinese (Traditional), Haitian Creole, Korean, and Russian in each of those languages.



Clicking on a language takes a reader to a page that has been entirely, professionally translated in that language. The translated page not only includes information about each of the Agency's programs, but also displays a large number of links to other relevant information, forms and notices. (Links are to documents in that language when they are available and to English documents when they are not.)



The Office of Refugee and Immigrant Affairs has confirmed that the information included on the Agency’s multi-lingual pages is up-to-date and complete. Once that process is complete, additional pages will be added in Bengali, Simplified Chinese, French, Polish and Urdu. By July 2018, the HRA’s public web site will have professionally translated text, as well as useful links, in all of the eleven city-designated translation languages.

HRA clients also interact with the Agency through the ACCESS HRA site and mobile application. Clients may be able to use the ACCESS HRA web site to re-certify for their SNAP and Cash Assistance benefits, apply for SNAP, submit a Periodic Report for SNAP, edit their case details (mailing address, phone number and email address), upload documents, view Agency notices, request a budget letter and much more. Importantly, clients can also use ACCESS HRA to change their language preference, which will automatically change the language in which they receive notices from the Agency.

The ACCESS HRA mobile app, which allows clients to use a smart phone to manage their case details, upload eligibility documents and receive notifications from the Agency, is available in Arabic, Traditional Chinese, French, Korean, Russian and Spanish. (The mobile application is in French instead of Haitian Creole because neither iPhone nor Android devices support Haitian Creole.)



In addition to the sites mentioned above, HRA clients with access to a smart phone can use the “HRA Document Upload” application to upload and submit requested eligibility documents to the Agency. Like the Access HRA mobile app, the Document Upload app is available in Arabic, Traditional Chinese, French, Korean, Russian and Spanish.



h. Emergency Preparedness and Response

HRA has updated its Emergency Preparedness Plan to ensure that LEP clients are able to access services during an emergency. This plan includes ensuring that documents are translated, appropriate multi-lingual signage and LEP identification tools are available at emergency sites, interpreters can be contacted, and staff are trained in the provision of language services. In addition, HRA's Crisis and Disaster Unit and ORIA have worked closely with MOIA and the Office of Emergency Management (OEM) to develop a plan to improve citywide coordination around LEP access to services during an emergency. The plan incorporates services for LEP populations as part of business continuity planning, such that language access will be available during and after an emergency.

V. Training

All HRA staff who work with clients, whether by phone, email or in-person, are mandated to receive training on working with limited English proficient (LEP) New Yorkers every year. The current version of the training was written by ORIA in 2016 and updated in 2017. It was rewritten in 2018 in order to include updated material and ensure that the presentation is fresh and interesting.

HRA's LEP training includes an overview of the Agency's client population and a brief discussion of our legal obligations before going into detail on how to provide language services. The training gives staff step-by-step instructions on how to interact with LEP clients in-person at the centers, over-the-phone and in the field. (This framework allows trainers to emphasize some forms of interaction and/or summarize others, depending on the roles of the staff being trained.) It includes information on when to speak with their designated language liaison and when to call ORIA for additional support. The training also includes specific information on working with sign language clients. Finally, the training ends with five challenging, real-world scenarios.

The training takes an hour and a half and is usually delivered by professional trainers with the Office of Policy, Procedure and Training. (In some instances, ORIA conducts trainings directly for program staff.) HRA no longer uses online tools for LEP training.

VI. Record Keeping and Evaluation

HRA tracks clients' preferred language for speaking and reading through a number of program-specific databases. The largest of these databases is the New York State Welfare Management System (WMS), which tracks client data for participants in the Cash Assistance, SNAP, Medicaid and HIV/AIDS Services Administration (HASA) programs. Other programs, including the Office of Child Support Services (OCSS), the Home Energy Assistance Program (HEAP), Adult Protective Services (APS) and the Investigation, Revenue and Enforcement Administration (IREA) track client language data in their own databases.

Client interactions in the Cash Assistance and SNAP programs are recorded in the Paperless Office System (POS). For specific types of client interactions, including new applications, re-certifications and certain types of case changes, POS records how language services were provided. Options include:

- the use of bilingual staff;
- the client brought his/her own interpreter;
- the use of telephonic interpretation services; and
- the use of on-site interpretation services.

One of ORIA's roles is to determine how LEP clients are being served by HRA. In addition to carefully monitoring client data and working closely with center-based staff, ORIA and other HRA outreach units meet with Community-Based Organizations (CBOs), immigrant clients and members of our External Language Access Working Group. HRA's Office of Constituent Services tracks any language access complaints received by the Agency, 311, nyc.gov and/or other elected officials. ORIA reviews and responds to the complaints and takes appropriate follow-up actions with program areas.

Finally, the Office of Quality Assurance asks clients to fill out a survey during audits in clients' homes, at HRA sites and on the phone. Bilingual staff and interpreters are used to conduct these surveys with LEP customers.

VII. Outreach and Public Awareness of Language Access Services

HRA informs the public of the availability of language services through posters in all of our walk-in centers, notices in applications and renewal packets and a notice on tickets in FIA walk-in centers. In addition, all staff are trained to offer free language services to every client at every interaction.

“Free Interpreter Services” poster

In 2016, HRA updated its “If you need an interpreter” poster to make it applicable to both HRA and DHS locations. The poster reads “You have the right to free interpreter services at this location. If you need an interpreter, please go to the reception desk and we will call someone to interpret for you. If you have a question, comment or complaint about translation or interpretation at this location, please speak to a worker or call 311. Filing a complaint will not affect your case.” This statement is translated into Albanian, Arabic, Bengali, Simplified Chinese, Traditional Chinese, French, Greek, Haitian Creole, Hebrew, Hindi, Italian, Korean, Polish, Punjabi, Russian, Spanish, Urdu, Vietnamese, and Yiddish. The new, improved poster also indicates the availability of sign language interpretation services. These posters are prominently displayed in all of HRA’s walk-in locations.

You have the right to
FREE INTERPRETER SERVICES
at this location.

*If you need an interpreter, please go to the reception desk and we will call someone to interpret for you.
If you have a question, comment or complaint about translation or interpretation at this location,
please speak to an HRA worker or call 311. Filing a complaint will not affect your case.*

ARABIC ▶ لديك الحق في الحصول على خدمات الترجمة الفورية المجانية في هذا الموقع. إذا كنت بحاجة إلى مترجم فوري، يُرجى الذهاب إلى مكتب الاستقبال وستقوم بالاتصال بشخص يقوم بالترجمة الفورية لك. إذا كان لديك سؤال أو تعليق أو شكوى بشأن الترجمة أو الترجمة الفورية في هذا الموقع، يُرجى التحدث إلى موظف بإدارة الموارد البشرية أو الاتصال بالرقم 311. إن التقدم بشكوى لن يؤثر على حالتك.

ALBANIAN ▶ Në këtë vend gëzoni të drejtën e shërbimeve të interpretimit falas. Nëse ju duhet një interpretues, ju lutemi t'i drejtoheni receptionit dhe ne do të caktojmë dikë që të interpretojë për ju. Nëse keni pyetje, komente apo ankesa në lidhje me përkthimin ose interpretimin në këtë vend, ju lutemi flisni me një punonjës të Administratës së Burimeve Njerëzore (HRA) ose telefononi në numrin 311. Dorëzimi i ankesës nuk do të ndikojë në çështjen tuaj.

BENGALI ▶ এই জায়গায় আপনি মিনহেচায় ইন্টারপ্রিটার পরিবেশা পেতে পারবেন। আপনার কোনো ইন্টারপ্রিটারের প্রয়োজন হলে, অনুগ্রহ করে রিসেপশন ডেস্কে গিয়ে জানান এবং আমরা আপনার জন্য ইন্টারপ্রিটার আনিয়ে দেব। এই জায়গায় অনুবাদ বা ইন্টারপ্রিটেশন নিয়ে আপনার কোনো প্রশ্ন, মন্তব্য বা অভিযোগ থাকলে, অনুগ্রহ করে কোনো HRA কর্মীর সঙ্গে কথা বলুন বা 311 নম্বরে কল করুন। অভিযোগ জানাশেষ হলে কাগজে আপনাকে কোনো অনুবাদ/পড়তে হবে না।

In addition to the free interpretation services poster, all clients who receive a ticket/place in line in our offices, receive a notice, in ten languages, that free language services are available. (For details on the ticket, see section IV.A.1.)

All clients who are applying or recertifying for any benefits are also provided with a Notice of Free Interpretation Services in seven languages. (For details, please see section IV.A.1.)

Finally, HRA informs potential LEP customers of the availability of language services through community outreach and by distributing materials that provide information on HRA's language access. Over the years, ORIA has conducted outreach to immigrant-serving CBOs and has given presentations on how LEP customers can access services. Since 2016, ORIA has been working closely with a group of language access legal advocates in a Language Access Work Group. This group, and the Agency/community interaction that it generates, is expected to continue into the future.

VIII. Language Access Complaints

DSS's Office of Constituent Services tracks any language access complaints received by the Agency, 311, nyc.gov and/or elected officials. Calls are summarized by agents and emails uploaded directly into the Agency's Internet Quorum (IQ) program. Any complaints that include a language component are forwarded to ORIA or to ORIA and a specific program area for resolution. If a complaint is limited to language services concerns, ORIA will work with the program involved to ensure that all staff are reminded of their language access duties and address any systematic language access concerns. If case issues are involved as well, ORIA works with the appropriate program to ensure that both case issues and language access concerns are addressed.

IX. Implementation Plan Logistics

a. Implementation Goals and Timeline

	GOAL #1: Ensure agency-created documents are translated in compliance with LL 30 and the Agency’s translation policy	Responsible Staff	Deadline
Milestone 1	Create a catalog of agency-created documents. Prioritize the list according to the legal requirements of LL30.	OPPT, ORIA, Programs	May. 2018
Milestone 2	Complete plain language review and editing of mandatory documents.	OPPT, Programs	June 2018
Milestone 3	Submit documents for translation.	OPPT, ORIA	June 2018
Milestone 4	Ensure that documents are translated into 11 languages. Static documents and those that are given to clients in a Center will be immediately available.	ORIA	July 2018
Milestone 5	Phase 1: Highest priority mailed documents (35% of total) programmed and deliverable to clients in 12 languages.	ITS, OPPT	July 2018
Milestone 6	Phase 2: Priority mailed documents (60% of total) programmed and deliverable to clients in 12 languages.	ITS, OPPT	Dec 2018
Milestone 7	Phase 3: All Agency forms deliverable to clients in 12 languages.	ITS, OPPT	June 2019
	GOAL #2: Ensure all application and recertification materials are LL30 compliant	Responsible Staff	Deadline
Milestone 1	Add additional languages to the Notice of Free Interpretation	ORIA, OCM	May 2018
Milestone 2	Make Agency produced client notices/forms in application/recertification packets available in 12 languages.	FIA, OPPT, ORIA	June 2018

	GOAL # 3: Expand the use of technology to provide high-quality client services	Responsible Staff	Deadline
Milestone 1	Add additional languages to Self-Service kiosks	ITS	Dec. 2018
Milestone 2	Add French and Polish to tickets	ITS	Dec. 2018
Milestone 3	Increase the number of tablets available for video interpretation services for LEP clients	ITS, FIA	April 2018
Milestone 4	Provide additional translations on HRA.gov	OCM, ORIA	June 2018
Milestone 5	Expand video sign language interpretation services to Office of Child Support locations	OCSS, ITS	Sept. 2018
	GOAL # 4: Maintain compliance with LL by providing LEP training to all front-line staff	Responsible Staff	Deadline
Milestone 1	Rewrite LEP training for 2018	ORIA	Completed Feb. 2018
Milestone 2	Train all front-line staff	OPPT	Dec. 2018

b. Implementation Plan Updates

This implementation plan will be updated at least once every three years and the updates posted on hra.gov, as required by Local Law 30. Intermediary plans will be created and posted more frequently if deemed necessary by HRA’s Language Access Coordinator and Agency leadership.