

**2018 Language Access Implementation Plan:
Department of Homeless Services (DHS)**

- I. Agency Mission and Background**
 - a. Programs and Services Offered

- II. Agency Language Access Policy and Goals**
 - a. DHS's Policies around Language Access
 - b. Goals of DHS's Language Access Implementation Plan

- III. LEP Population Assessment**
 - a. US Dept. of Justice Four Factor Analysis
 - b. Language Access Needs of the Agency

- IV. Provision of Language Access Services**
 - a. In-person Interactions
 - i. Identifying a Resident's Language of Preference
 - ii. Telephonic Interpretation Services
 - iii. Bilingual Staff
 - iv. Video Interpretation Services
 - v. On-Site Interpretation Services
 - vi. Client Provided Interpretation Services
 - b. Over-the-Phone Interactions
 - c. Field and/or Home Visits
 - d. Hearings
 - e. Public Events (forums, town halls, etc.)
 - f. Public Notices and Mailings
 - g. Agency Website
 - h. Emergency Preparedness and Response

- V. Training**

- VI. Record Keeping and Evaluation**

- VII. Outreach and Public Awareness of Language Access Services**

- VIII. Language Access Complaints**

- IX. Implementation Plan Logistics**
 - a. Language Access Coordinator
 - b. Implementation Goals and Timeline
 - c. Implementation Plan Updates

The Department of Homeless Services (DHS) is a relatively small agency with a huge and important mission: preventing homelessness in one of the most expensive cities in the world and housing any New York City resident who has nowhere else to go.

In 2017, the administrative operations of DHS and the Human Resources Administration (HRA) were consolidated in order to better carry out that mission. Included in the new Department of Social Services (DSS) is the Office of Refugee and Immigrant Affairs (ORIA), a team of advocates working to ensure that immigrants and limited English proficient (LEP) New Yorkers have equal access to Agency benefits. Having a dedicated team give expert guidance on language access issues, manage language services contracts, review and advise on policies and procedures and conduct trainings has significantly increased DHS's capacity for providing language services.

In 2017, DHS piloted allowing shelter vendors to access DHS's telephonic interpretation services contract. When combined with the diverse, bilingual staff that work in shelters operated by non-profit providers, this access should ensure that all of our shelter residents are able to communicate with their case workers and get the housing support that they need in their own language.

DHS has also used the shared resources of DSS to improve the way that clients are notified of their right to interpretation services. In 2017, new "Free Interpretation Services" posters were hung at all DHS-run locations, making it clear from the moment that clients walk in the door that the Agency is a multi-lingual living and work space.

Finally, DHS has benefited from the shared contracting services of HRA and DSS. DHS now has access to on-site interpretation services for individual client appointments and for public meetings.¹ Even clients who are unable to use the phone can now communicate with DHS easily. At community meetings, members of the public will be able to receive Agency news and updates, as well as provide feedback, in a language that they understand.

DHS is committed to the changes that are being made in our Agency, but we still have work to do. Over the course of 2018 and early 2019, DHS and DSS will be working to ensure that every notice that we share with residents, applicants and members of the public is available in twelve languages. (Eleven translations plus English.) By going beyond the requirements of Local Law 30, DHS is in the process of creating a truly multi-lingual living and working space that reflects the diversity of our city.

Thank you for taking the time to review this Language Access Implementation Plan and learn more about the many ways that DHS programs and staff are working to prevent homelessness and ensure that ALL New Yorkers have a safe place to call home.

¹ Refers to on-site interpretation services for spoken languages. DHS has had access to on-site interpretation services for sign language for many years.

I. Agency Mission and Background

The Department of Homeless Services (DHS) works to prevent homelessness before it occurs, address street homelessness, and assist New Yorkers in transitioning from shelter and street homelessness to permanent housing. DHS collaborates with non-profit partners to provide temporary shelter and services that homeless New Yorkers need to achieve and maintain housing permanency.

In February 2017, the Mayor announced his comprehensive plan to turn the tide on homelessness in New York City, neighborhood by neighborhood. The plan's guiding principle is community and people first, and giving homeless New Yorkers, who come from every community across the five boroughs, the opportunity to be sheltered closer to their support networks and anchors of life, including schools, jobs, healthcare, family, houses of worship, and communities they called home in order to more quickly stabilize their lives and return to independent living in the community. These goals are best achieved through partnerships with those we serve, public agencies, and the business and non-profit communities.

Through this approach, we focus on the following critical objectives:

- To increase the number of households prevented from becoming homeless
- To reduce the number of individuals living on the streets
- To ensure the availability of temporary, emergency shelter for individuals and families with no other housing options available to them
- To increase client engagement and responsibility in moving to permanent housing
- To maintain shelter safety and sanitation
- To reduce clients' length of stay in shelter
- To ensure that those who exit shelter remain stably housed in the community

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

Shelter

Governed by a unique right to shelter mandate, New York City provides temporary emergency shelter to every man, woman, and child who is eligible for services, every night. This policy sets New York apart from municipalities across the nation—many of which turn homeless individuals and families away once shelters have filled up or simply put their names on a waiting list.

New York City's shelter system is consistently recognized as the most sophisticated and comprehensive in the nation. The City is also an innovative leader in the field of preventive services for those who are at

risk of becoming homeless. All New Yorkers should be proud to live in a city that focuses intently on prevention efforts at the forefront of its policies, while providing shelter as a safety net for those in need.

Before any New Yorker can enter shelter, he or she must first apply at the intake center that is designated for his or her family composition:

- Families with children under the age of 18 should go to Prevention Assistance and Temporary Housing (PATH), 151 E. 151st Street, Bronx, NY 10451
- Adult families (more than one individual, but none under the age of 18) should go to the Adult Family Intake Center (AFIC), 400-430 E. 30th Street, New York, NY 10016
- Single adult men should go to 30th Street Intake Center at 400-430 East 30th Street, New York, NY 10016
- Single adult women should go to either HELP Women's Shelter, 116 Williams Avenue, Brooklyn, NY 11217 *or* Franklin Shelter, 1122 Franklin Avenue, Bronx, NY 10456

Individuals and families who do not have other options available to them are then provided shelter in a location that is either DHS or vendor operated. All shelter sites, whether they are DHS or vendor-operated are required to have tools, procedures and resources for working with LEP residents in their preferred language.

Ombudsman

The Office of the Ombudsman is charged with resolving constituent issues and concerns through alternative dispute resolution methods, including mediation services. Experienced Constituent Services Representatives provide effective conflict resolution, and work to ensure fair and equal access to DHS, City, and community-based services and resources. The staff actively engages constituents and empowers them to participate in positive decision-making processes. With the goal of seeking independent and impartial issue resolution, the Office is responsible for:

- Providing information and education on homeless services
- Providing a supportive client experience through effective and compassionate listening, and timely client-focused case management
- Providing general assistance and communication facilitation, including service referrals and connections
- Addressing unresolved grievances or dissatisfied outcomes
- Evaluating and investigating client grievances
- Mediation
- Strategic data tracking and recommendations to DHS management

II. Agency Language Access Policy and Goals

a. DHS's Policies Around Language Access

Ours is a city of immigrants. In this ever-changing national climate, DHS and DSS are in the process of making changes that demonstrate our commitment to providing equal access for all New Yorkers, regardless of immigration status or language preference.

DHS is a multi-lingual work and living space. In 2017, the Agency sheltered a total of 112,715 individuals or families. Of those, nine percent, or 10,369 individuals/families identified their preferred language as something other than English. Collectively, our residents spoke almost 30 languages.

All DHS employees are required to work with every resident in his or her preferred language. Historically, the Agency has provided language services by using our bilingual staff and contracted telephone interpretation services. When needed, staff used on-site interpretation services for deaf/hard-of-hearing residents.

As of 2017, DHS staff also have access to video interpretation services for deaf/hard-of-hearing clients and on-site interpretation services for limited English proficient (LEP) residents in more than 100 spoken languages. Over the course of 2018 and 2019, DHS staff will be implementing a plan to meet the Agency's goal of creating a fully multi-lingual space, where all of the documents and notices given to clients will be in the eleven² city-wide translation languages: Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

b. Overall goals of DHS's language access implementation plan

In keeping with DHS's commitment to providing benefits and services to all eligible applicants, this plan ensures that language shall not be an obstacle to receiving shelter for individuals with limited English proficiency.

The goal of this plan is to guarantee that all eligible persons receive appropriate benefits without undue delay or difficulty based on language. Intake and placement should take no longer for LEP clients than it does for English proficient clients. All of the support services available to shelter residents should be available to all residents, regardless of language.

² DHS recognizes that Local Law 30 lists ten designated city-wide languages for translation, but the law does not designate which form of Chinese characters should be provided. Given the size of the Chinese reading population that the Department of Social Services (DSS) serves, the Agency has opted to provide all notices in both styles of characters, implementing the Local Law 30 mandate as eleven translations or twelve languages when counting English, rather than ten.

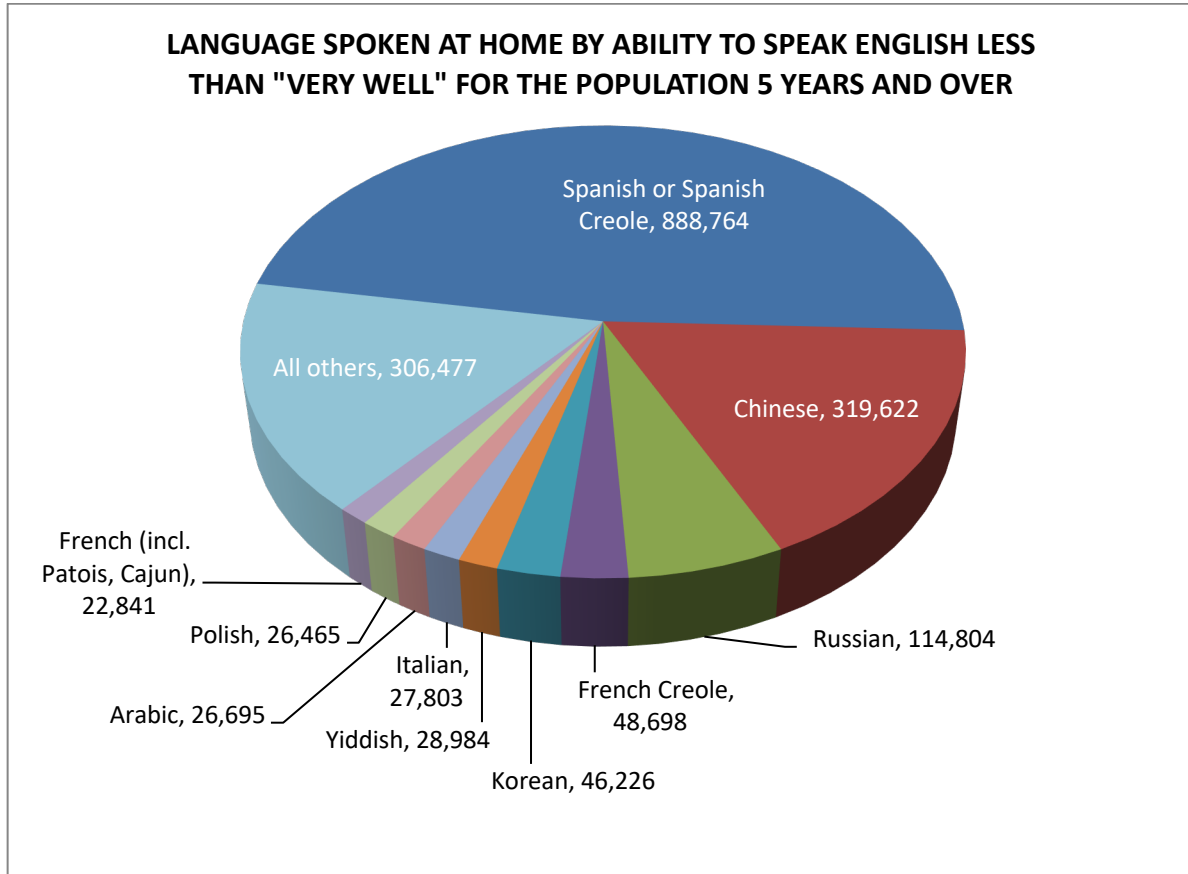
This Language Access Implementation Plan will inform DHS clients, applicants for benefits, the public, the Mayor's Office of Immigrant Affairs (MOIA) and the New York City Council about the language services that DHS provides and how they are provided.

III. LEP population assessment: 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. DHS’s service area includes all of New York City.

According to the U.S. Census Bureau³, 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

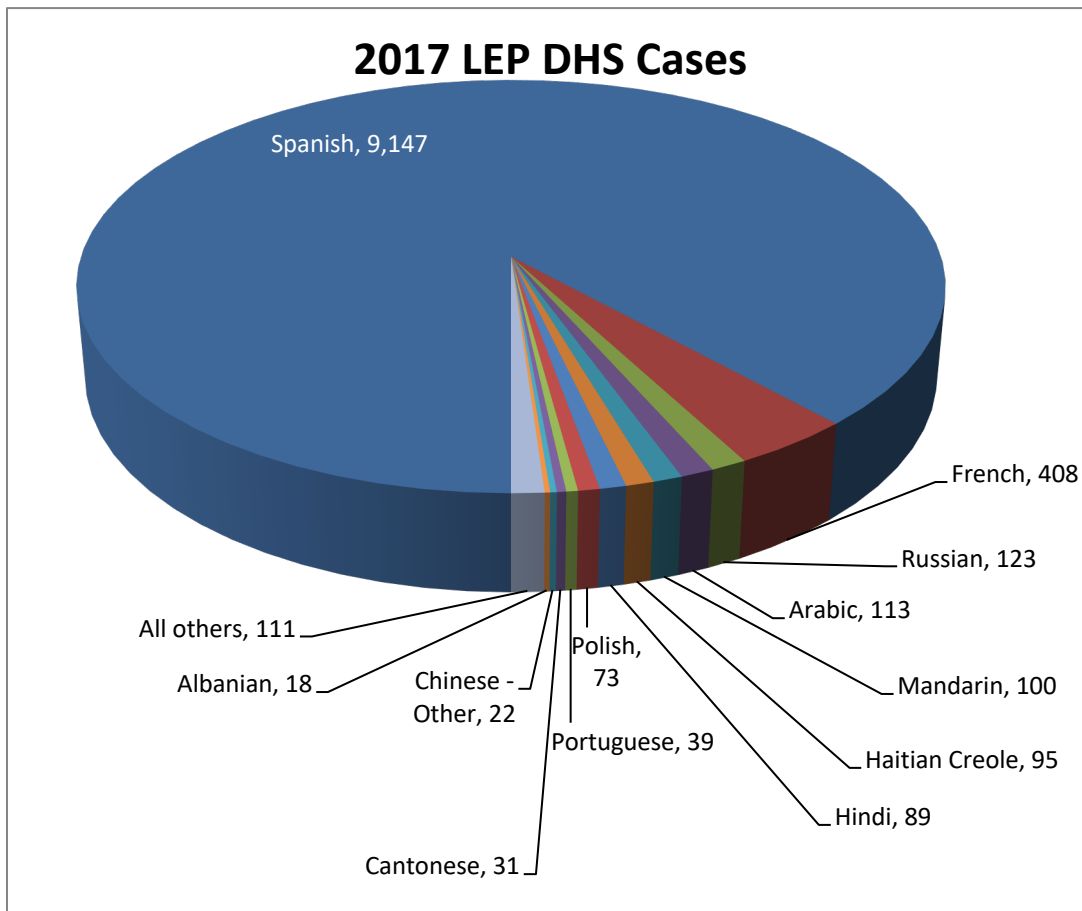


³ 2011-2015 5-Year American Community Survey

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

In 2017, DHS served a total of 112,715 individuals or families. Of those, nine percent, or 10,369 individuals/families who lived in shelter in 2017, are limited English proficient (LEP). Collectively, DHS residents speak almost 30 languages. The top ten languages spoken by DHS residents, other than English are Spanish, French, Russian, Arabic, Mandarin, Haitian Creole, Hindi, Polish, Portuguese and Cantonese. [see Figure 2]

Figure 2



Given the residential nature of DHS programs, the majority of the interactions between clients and staff occur in-person at intake centers and shelters. Clients do have the opportunity to call or write to the Ombudsman Unit to resolve complaints, case issues or shelter concerns. Staff meet with residents and landlords in the field as well. Finally, residents, applicants and members of the public receive written information from the Agency regarding their specific benefits and general information about programs and services offered.

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

The nature and importance of DHS stems from its mission to assist individuals in profound need of assistance. Temporary housing assistance is an essential city service to which all should have equal access. This plan reflects DHS'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 DHS 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 of providing various types of language services.

DHS primarily meets the needs of LEP residents through the use of bilingual staff and telephonic interpretation services (available in more than 200 languages). Deaf/Hard-of-Hearing clients are provided on-site interpretation services. DHS staff gained access to onsite interpretation for spoken languages and video interpretation for sign language in 2017. With these tools, DHS staff are expected to communicate with every resident in his or her language of preference.

The Agency uses outside vendors to provide written translation, on-site interpretation, telephonic interpretation, and sign language interpretation. These services are provided to residents through the citywide language service contracts provided through the Department of Citywide Administrative Services (DCAS).

In November of 2017, DSS was able to put in place a process for on-site interpretation services for LEP residents at DHS for the first time. (This service is distinct from sign language interpretation services.) Within DHS, it is expected that the use of this service will continue to be very low, as the large majority of DHS residents will be able to use telephonic interpretation service, but for those residents who do need the service, it will be an invaluable support.

As discussed in detail in Section IV.f, DHS is still in the process of creating both appropriate notices and distribution mechanisms for translated notices. It is expected that the Agency's use of written translation services will be much higher in coming years. DHS will not be translating into additional languages other than those required by LL30 because the Agency has a relatively small population of LEP clients and client needs will be met under the local law.

| Type of Service | Vendor | 2017 Instances | 2017 Expenditure |
|--|-------------------------------|--------------------------|---------------------|
| Telephonic Interpretation | Language Line Solutions, Inc. | 14,582 | \$146,568.00 |
| On-Site Interpretation (excluding sign language) | Geneva Worldwide, Inc. | 0 (implemented 11/17) | \$0 |
| Sign Language Interpretation | Accurate Communication, Inc. | 144 | \$28,367.16 |
| Written Translation | Language Line Solutions, Inc. | 50 documents | \$31,038.00 |
| Total Costs | | | \$205,973.16 |

b. Language Access Needs of the Agency

DHS fully understands that effective communication in any language is essential for accessing our crucial services and programs. The Agency is firmly committed to ensuring that all New Yorkers, no matter their language of preference, can apply for and access shelter. While serving more than 8,000 limited English proficient New Yorkers per year requires a significant commitment, it is a commitment that the Agency is prepared to make.

DHS provides telephonic interpretation services in more than 200 languages, which means that the Agency is able to communicate with more than 99.5% of residents in their language of preference.

Between 2017 and 2019, DHS intends to make a significant investment in written translations. In order to meet the mandate of Local Law 30, all DHS forms must be cataloged, reviewed for plain language, free form text fields must be removed (to the extent possible), and then they must be translated into the eleven city-wide languages. At the same time, an entirely new document production process must be created in order to generate, print and distribute notices in languages other than English. By July of 2019, DHS is committed to being fully compliant with Local Law 30 by providing all notices in twelve languages.

IV. Provision of Language Access Services

a. In-Person Interactions

All DHS staff are required to work with every resident in his or her preferred language. To do this, staff must first correctly identify the resident’s language using a combination of tools.

Once an individual’s preferred language is identified, there are five ways for staff to meet the language mandate: they can use telephonic interpretation services, their own bilingual skills, video interpretation services, on-site interpretation services or the resident can provide his or her own interpreter.

1) Identifying a Resident’s Language of Preference

All direct interactions between DHS staff and residents begin with an offer of free language services. If a resident accepts the offer of language services, the second step is to identify his or her language of preference. Many residents self-identify their preferred language in English. Others are identified by the Agency’s diverse bilingual staff. In addition, staff can use the Language Card or our telephonic interpretation services vendor to identify a resident’s preferred language. An additional Notice of Free Interpretation Services will be available by the spring of 2018.

The Language Card

As of the summer of 2017, DHS staff are using the same Language Card as HRA staff. 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. 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 को 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. |

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

If a resident does not identify their preferred language on the Language Card, it may be because they speak another language or because they do 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.

Notice of Free Language Interpretation

By the spring of 2018, all DHS applications for shelter services will include an 8.5”x 11” notice of free interpretation services in their application packets. This notice, which will be shared with HRA, will read “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.” This message will be printed in English, Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

2) Telephonic Interpretation Services

Most frequently, DHS staff use professional telephonic interpretation services to communicate with residents who prefer to use a language other than English. In 2017, DHS used telephonic interpretation services more than 14,500 times.

In December of 2017, DHS began a pilot to extend the provision of telephonic interpretation services to contracted shelter providers. At the end of 2018, the Agency will review the additional costs and outcomes of this pilot with program leaders and shelter providers to determine the best mechanism for ensuring that all residents have access to language services from within the shelter.

The quality of the Agency’s telephonic interpretation services are confirmed by ORIA. ORIA staff track complaints and meet regularly with program staff and outside advocates to understand the experiences and concerns of individuals who have used the service. 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.

3) 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.

4) Video Interpretation Services

In specific instances, DHS can provide video interpretation services for deaf/hard-of-hearing residents.

All of the DHS-run intake centers, including PATH (the intake center for families with children) the Adult Families Intake Center and the 30th Street Intake Center (for single men), are equipped with video technology, including cameras and dual monitors, to provide video interpretation services for deaf/hard-of-hearing clients. Using video technology, an interpreter can be arranged in only 20 minutes.

In 2018, ORIA will continue to work with staff from DHS Disability Affairs and intake center staff to increase the use of this technology by providing training and equipment support.

5) On-site Interpretation Services

In 2017, DHS used on-site sign language interpretation services more than 200 times.

In November 2017, DHS gained access to on-site interpretation services for spoken languages through a shared contract under DSS. These services are primarily intended for situations in which a client is unable to use the phone or when a conversation would be too difficult to have using the phone. The Agency expects that the usage of this contract will increase in 2018, but will always remain low.

6) Client Provided Interpretation Services

In some DHS situations, residents have the right to bring friends, family or confidants with them to DHS interviews/meetings. In these instances, residents 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 resident 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 resident to make the decision as to how he/she wishes to communicate.

b. Over-the-Phone Interactions

The majority of the over-the-phone interactions between DHS residents and staff occur at the Ombudsman Unit, where residents can file complaints and/or make adjustments to their case. In 2017, this unit transferred to the Office of Constituent Services within the Department of Social Services. Together, the units that make up the Office of Constituent Services received more than 4 million calls in 2017.

All DHS and DSS staff who answer or make phone calls have access to telephonic interpretation services in more than 200 languages.

c. Field and/or Home Visits

There are two primary instances in which DHS staff meet residents in the field. One is to try to arrange for residents to return to a previous living situation. The other is to attend housing interviews or view a potential new apartment with a resident.

When staff meet residents or landlords in the field, they have access to the same language tools as staff working in DHS locations: the Language Card to identify the individual's preferred language and access to telephonic interpretation services.

d. Hearings

There are a variety of circumstances under which DHS residents have the right to a Fair Hearing in a New York State Administrative Court. DHS is a party to those proceedings, but is not responsible for providing language services.

The only situation in which DHS hosts hearings is when a family shelter requests that a resident be involuntarily transferred out of a State-regulated shelter. In that circumstance, the resident is presented a written discharge form that explains the reason for the discharge and allows the resident to request a pre-discharge hearing. This discharge form is currently available in English and Spanish, but will be available in all 11 city-wide designated translation languages by July 1, 2018. A part of the hearing request that is included in the discharge form asks if the resident would like language services to be provided at the hearing. Even if the resident does not answer the language services question, the shelter will give the DHS hearing staff information on the resident's preferred language so that interpretation services can be arranged.

If a resident requests language services at a pre-discharge hearing, or if DHS attorneys or shelter staff believe that the client needs language services, then those services can be provided one of three ways: staff can use telephonic interpretation services, bilingual staff can use their own language skills, or residents can use their own interpretation services. For information on how the Agency provides each of these services, please see sections IV.a.2, IV.a.3 and IV.a.5 of this report.

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

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

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

Agency leaders and outreach staff are also 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, DSS has assisted other City agencies and community-based organizations with on-site interpretation services.

f. Public Notices and Mailings

In 2017, DSS established an Agency-wide translation policy that requires that all Agency-developed materials which will be distributed to or seen by clients (including notices, forms and informational materials) be translated into Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

In December 2017, the DSS General Counsel created a work group to bring DHS into compliance with Local Law 30 and the DSS translation policy. The work group includes members from ORIA, DHS program leaders, staff from the DSS Office of Policy, Procedures and Training (OPPT), staff from Information Technology Services (ITS) and representatives from the Office of Legal Affairs. To date, the group has come up with a detailed work plan and will oversee this complex and challenging process. Additionally, as part of DHS's integration with HRA, DSS now has centralized the production, tracking and revision of forms in an office that serves both agencies. This centralized process will facilitate DHS's effort to come into compliance with Local Law 30. For details on how the Agency will achieve compliance, please see section IX.b of this Plan.

g. Agency Web Site

As of December 2017, the DHS public web site, nyc.gov/dhs, provides users with a Google Translate option which allows readers to view most of the text on the site in a large number of languages.

The Office of Communications and Marketing (OCM), ORIA and DHS program areas are currently working together to create new multi-lingual text for the DHS web site that models the HRA site, nyc.gov/hra. Rather than providing the entire site in multiple languages, DHS program areas will summarize key information and provide professional translations of that summary in the eleven city-wide translation languages: Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian-Creole, Korean, Polish, Russian, Spanish and Urdu. The site is expected to include this multi-lingual text by Sept. 2018.

h. Emergency Preparedness and Response

DHS has updated its Emergency Preparedness Plan to ensure that LEP residents are able to access services during an emergency. This plan includes ensuring that documents are translated, that appropriate multi-lingual signage and LEP identification tools are available at emergency sites, that interpreters can be contacted, and that staff are trained in the provision of language services. In addition, DSS'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 DHS 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, which takes an hour and half to deliver, was written by ORIA in 2017. It will be rewritten in 2018 in order to include updated material and ensure that the presentation is fresh and interesting.

DHS'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 residents at intake locations, in shelter, 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.

In 2018, DHS plans to use a train the trainer model to conduct LEP trainings. Staff leaders from each location will be trained by ORIA and then, in turn, they will train the other members of their team. DHS program areas will receive support from OPPT and ORIA in administering, tracking and conducting trainings.

VI. Record Keeping and Evaluation

The primary database used by DHS staff for tracking client needs and interactions is the Client Assistance and Rehousing Enterprise System (CARES).

Prior to 2017, CARES only recorded the language spoken by DHS case heads. In 2017, a field to record and track reading language was added.

One of ORIA's roles is to determine how LEP clients are being served by DHS. As of July 2017, ORIA is maintaining detailed records of the language services used by DHS staff. The team tracks:

- the number of calls to telephonic interpretation services by program, by vendor and by language;
- the number and nature of documents translated;
- sign language interpretation requests by program and method (video or on-site); and
- on-site interpretation requests by program and by language.

All of these requests are regularly compared to client data for each program to ensure that the number of service requests is appropriate for the client population.

In addition to carefully monitoring data and working closely with center-based staff, ORIA and other DSS outreach units meet with CBOs and community leaders to get a sense of whether appropriate services are being provided. DSS's Office of Constituent Services tracks any language access complaints received by the Agency, 311, nyc.gov and/or elected officials. ORIA reviews and responds to the complaints and takes appropriate follow-up actions with program areas.

VII. Outreach and Public Awareness of Language Access Services

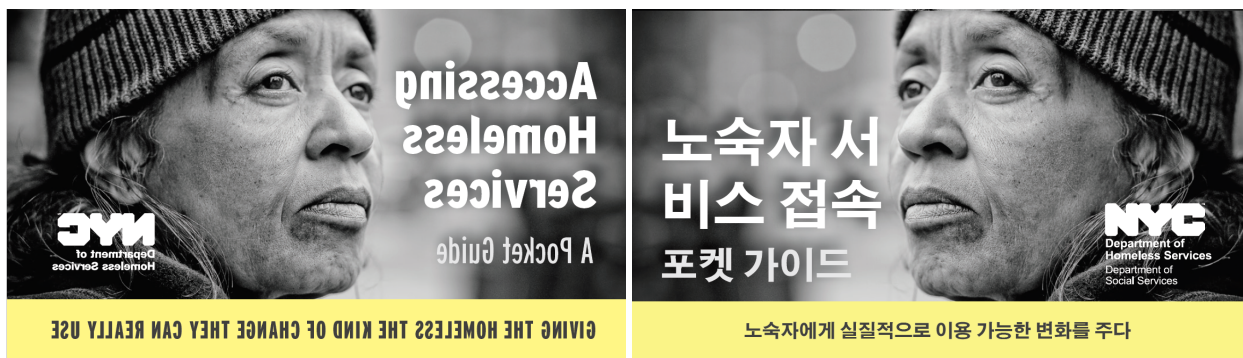
DHS engages in two types of outreach: outreach to homeless individuals to encourage them to transition into housing and outreach to partner organizations and individuals to give them information about the Agency’s services. In addition to this outreach, residents are informed of their right to free language services by free interpretation posters and by staff.

Homeless Outreach

Operating the most comprehensive street outreach program in the nation, DHS deploys outreach teams 24 hours per day, seven days a week, 365 days a year, citywide, to canvass the five boroughs with the goal of engaging street homeless individuals and encouraging them to accept services and transition from the streets into housing.

Homeless outreach efforts become more urgent during periods of extreme hot or cold weather and homeless New Yorkers seeking shelter during inclement weather in New York City will not be turned away. Implementing its Code Blue and Code Red procedures respectively, DHS redoubles efforts to help unsheltered homeless New Yorkers indoors during extreme temperatures by doubling the number of outreach staff in the field, enabling teams to check on vulnerable individuals more frequently, making regular, repeated contact to protect safety and continue to offer services and support.

To the extent possible, all DHS outreach teams follow the same procedures for language access as other Agency staff members. Outreach staff all carry Language Cards (for details on this card, see section IV.a.1) to allow them to appropriately identify the language of the individual they are meeting and offer every potential resident free language services. Outreach staff use mobile phones to contact telephonic interpretation services from anywhere in the city. In addition, these staff carry pocket guides that list the various intake centers in 12 languages: Arabic, Bengali, Simplified and Traditional Chinese, English, French, Haitian-Creole, Korean, Polish, Russian, Spanish and Urdu.



(The text appears backwards because of the way the document is designed to fold.)

Outreach to Partner Organizations

In addition to outreach to currently homeless populations, DHS informs CBO partners of the availability of language services through community outreach. ORIA has conducted outreach to immigrant-serving community-based organizations and has given presentations on how LEP residents 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.

Free Interpretation 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 DHS intake centers and direct-run shelters.

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 বিনামূল্যে ইন্টারপ্রিটার পরিষেবা পেতে পারবেন। আপনার কোনো ইন্টারপ্রিটারের প্রয়োজন হলে, অনুগ্রহ করে রিসেপশন ডেস্কে গিয়ে জানান এবং আমরা আপনার জন্য ইন্টারপ্রিটার আনিবে 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 জানাওলেও তাতে আপনার কোনো ক্ষতি হবে না।

Staff

In addition to the free interpretation services poster, as discussed earlier, all residents are informed by staff at the beginning of every conversation that free language services are available.

Finally, beginning in May 2018, all residents will receive a notice in their application packet, in ten languages, that free language services are available. (For details on the form, see section IV.A.1.)

VIII. Language Access Complaints

DSS's Office of Constituent Services, which includes the Ombudsman Unit, tracks any language access complaints received by the Agency and the Shelter Repair Hotline. 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 the Ombudsman Unit or to the Ombudsman and a specific program area for resolution. If a complaint is limited to language services concerns, the Ombudsman 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, the Ombudsman works with the appropriate program to ensure that both case issues and language access concerns are addressed.

Shelter complaints, including language complaints, received by 311 or nyc.gov are uploaded and tracked in Siebel, a customer service management program. These complaints are sent directly to DHS program areas for resolution.

DHS and DSS staff are working to combine these two procedures into a single, streamlined process by February of 2019, which will improve tracking, accountability and customer service.

IX. Implementation Plan Logistics

a. Language Access Coordinator

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

b. Implementation Goals and Timeline

| | | Responsible Staff | Deadline |
|--|---|--------------------------|-----------------|
| GOAL #1: Ensure all client notices and documents are in compliance with the Agency's translation policy (available in 11 languages) | | | |
| Milestone 1 | Create an inventory of all client notices/forms | DHS programs, ITS, OPPT | Feb. 2018 |
| Milestone 2 | Determine what systems/programs will be used to provide translated notices | ITS, DHS programs | April 2018 |
| Milestone 3 | Ensure that all involuntary discharge forms are available in 11 languages | OLA, ORIA | July 2019 |
| Milestone 4 | Review all notices to determine which should remain in circulation and prioritize translation | DHS programs | Sept. 2018 |
| Milestone 5 | Review all notices for plain language | OPPT and DHS programs | Dec. 2018 |
| Milestone 6 | Review all notices to reduce free-form text | ITS, DHS programs | Dec. 2018 |
| Milestone 7 | Create/update systems to allow the production of non-English forms and drop-in text | ITS | March 2019 |
| Milestone 8 | Translate all forms into 11 languages | ORIA, OPPT | March 2019 |
| Milestone 9 | Program new, translated forms into new distribution systems | ITS | July 2019 |

| GOAL #2: Use the power of shared DSS services to improve client service | | | |
|--|--|--|------------|
| Milestone 1 | Provide additional information on nyc.gov/dhs in all 11 citywide designated translation languages | OCM, ORIA, DHS programs | Sept. 2018 |
| Milestone 2 | Ensure that all application packets include a notice of free interpretation services | HPA, OPPT, ORIA | July 2018 |
| Milestone 3 | Combine 311 and Shelter Repair Hotline complaint tracking procedures | OCC, DHS programs | Feb. 2019 |
| GOAL #3: Increase the use of newly available communications tools | | | |
| Milestone 1 | Increase the use of on-site interpretation services to ensure that the language needs of the most vulnerable residents are met | ORIA, DHS programs | Sept. 2018 |
| Milestone 2 | Increase the use of video to provide sign language interpretation services and reduce client wait times | ORIA, Disability Affairs, DHS programs | Dec. 2018 |
| GOAL #4: Ensure the continuity of services over multiple platforms | | | |
| Milestone 1 | Review the use of telephonic interpretation services by DHS shelter vendors | ORIA, DHS programs | Dec. 2018 |
| Milestone 2 | Make a determination on the best way to provide language services to residents living in vendor-run shelters | ORIA, DHS programs | July 2019 |
| GOAL #5: Maintain compliance with Executive Order 120 by providing all front-line staff with LEP training | | | |
| Milestone 1 | Rewrite LEP training for 2018 | ORIA | Jan. 2018 |
| Milestone 2 | Train all front-line staff | DHS programs, OPPT, ORIA | Dec. 2018 |

| GOAL #6: Improve customer service by improving service tracking mechanisms | | | |
|---|---|------|-----------|
| Milestone 1 | Correct CARES database to use distinct lists for spoken and written languages | ITS | Feb. 2018 |
| Milestone 2 | Review language data available in CARES to ensure that volume of interpretation services provided is appropriate and proportional | ORIA | Jan. 2019 |

c. Implementation Plan Updates

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