

# INPROVING DC L'ANGUAGE ACCESS

From the Perspective of Community-Based Nonprofits Fiscal Year 2014

### IMPROVING DC LANGUAGE ACCESS

### FROM THE PERSPECTIVE OF COMMUNITY-BASED NONPROFITS

## Kelsey Chatlosh and Cecilia Castillo Ayometzi, Ph.D. Language Access and Advocacy Program, Office on Latino Affairs (OLA)

This project is part of an ongoing initiative that the Office on Latino Affairs (OLA) began in fiscal year 2012 to more proactively collect feedback on how Language Access services are provided to limited and non-English proficient (LEP/NEP) residents by DC government. The purpose of this project is to identify areas of improvement and develop concrete recommendations for how DC government agencies can serve their non-English speaking clients, from the perspective of nonprofit employees who assist their clients in navigating DC government services on a regular basis. These data were collected as follows:

 107 face-to-face interviews and surveys with direct-service providing employees across 54 Latino LEP/ NEP serving DC non-profits conducted by OLA from December 2013 to May 2014 of fiscal year 2014. These non-profits were primarily OLA grantees during fiscal year 2014 (FY14).

### Findings:

- The five main <u>areas of improvement</u> identified by FY14 non-profit interviewees, in terms of Language
  Access at DC government, are: I. lack of bilingual staff, 2. customer service by frontline staff (e.g. discriminatory remarks related to constituents' national origin, difficulties receiving language services), 3.
  translated documents and information, 4. outreach and awareness efforts and 5. navigation of the physical office space and its signage.
- The top ten <u>DC government agencies</u> in need of bettering Language Access services identified by FY14 non-profit interviewees are: I. Department of Human Services (DHS), 2. Department of Consumer and Regulatory Affairs (DCRA), 3. DC Public Schools (DCPS), 4. Department of Motor Vehicles (DMV), 5. Department of Health (DOH), 6. Department of Behavioral Health (DBH/Department of Mental Health, DMH), 7. Metropolitan Police Department (MPD), 8. DC Housing Authority (DCHA), 9. Department of Employment Services (DOES) and 10. Office of Tax and Revenue (OTR).

### **OLA's Recommendations:**

- I. Hire more bilingual frontline staff and create more certified bilingual positions.
- 2. Provide all frontline employees with more infrastructure, resources, and Language Access trainings particular to their agency, including a mechanism to inquire language preference from every client.
- 3. Prioritize new translations for legally binding forms, mailed notices requiring an immediate response from clients and overall service/resource guides; and make already translated materials accessible both in print and online.
- 4. Promote services and resources to LEP/NEP residents, including information on how to access and apply for available services and programs, through more multilingual outreach.
- 5. Translate and post more multilingual signage, with a quality control mechanism for new signage.
- 6. Hire at least one full-time Language Access Coordinator without other position duties within the agency and establish stronger internal supervision and enforcement of the provision of Language Access services.

### **Next Steps:**

Our next step will be presenting these new results and working collaboratively with a new set of prioritized DC government agencies to find agency-specific solutions and work towards implementing tangible changes. Additionally, the Office on Latino Affairs will provide overall recommendations and technical support to all thirty-three DC government agencies currently named under the Language Access Act.



### INTRODUCTION

The year 2014 marks the tenth anniversary of the DC Language Access Act. A decade ago, Mayor Anthony A. Williams passed Language Access into a law in order to ensure that all individuals who live in DC have equal access to DC government programs and services, regardless of their ability to speak or understand English. As the city's population of residents who do not speak or understand English very well continues to have a significant presence, District government continues to see the need to provide comprehensive services that are accessible in a multitude of languages and the Language Access law mandates that these services must be provided.

"Providing greater access and participation in public services, programs and activities for limited and no-English proficient residents of the District of Columbia" – DC Act 15-414

There are currently six languages officially named under the Language Access Act; which include Spanish, Amharic, French, Chinese, Korean and Vietnamese. Particularly for DC's Latino population, which according to the US Census 2012 American Community Survey represents 10 percent of DC's overall population, access to public services in Spanish and other languages is a vital community need. 12,568 self-identified Latino residents, or 24 percent of DC's entire Latino population, who speak Spanish at home and speak English less than "very well," according to the 2011 American Community Survey. Please see Figure 1 below for more details.

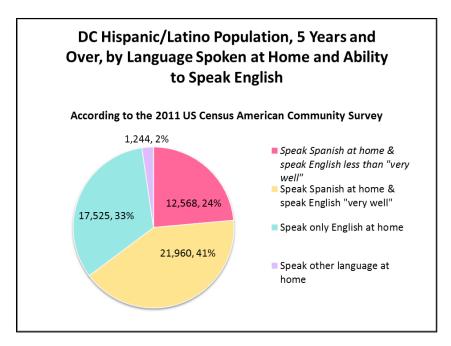


Figure 1. Chart of the DC Hispanic/Latino population, 5 years and over, by language spoken at home and ability to speak English, according to the 2011 US Census American Community Survey Estimates. Chart created by the Office on Latino Affairs.

The law currently names thirty-three DC government agencies<sup>11</sup> that are required to make their services accessible to residents with limited or no-English proficiency (LEP/NEP), through e.g. interpretation services, bilingual staff, and translated forms and information. Agencies must also collect data on the languages spoken by their clientele and conduct multilingual outreach to spread awareness of their services to LEP/NEP residents. Frontline and management employees receive trainings on Language Access compliance, and each agency designates a Language Access Coordinator to oversee all Language Access services as well as the agency's plan for implementation. Additionally, the Office on Human Rights (OHR) houses and enforces the Language Access Act, while the Mayor's Offices on Latino Affairs (OLA), Asian and Pacific Islander Affairs (OAPIA) and African Affairs (OAA) provide consultative technical support to the thirty-three government agencies covered under the Act.

During fiscal year 2012, the Office on Latino Affairs began a new method of proactively collecting feedback on the language accessibility of DC government services. From fiscal year 2012 to fiscal year 2013 (specifically June 2012 to September 2013), OLA conducted face-to-face interviews and surveys with both non-profit and government employees who work directly with limited and non-English proficient (LEP/NEP) clients and on-site observations of government service centers. Through this project, OLA identified a set of concrete recommendations for improving Language Access services and began working closely with the corresponding Language Access Coordinators to provide technical support with five prioritized agencies. OLA is currently working with the DC Department of Human Services (DHS) to implement new color-coded multilingual signage to make the physical center and its services easier to navigate for limited and no English proficient as well as English-speaking clients. OLA is also coordinating with the Metropolitan Police Department (MPD) to reorganize the translated materials posted on their website to make them easier for the public to find and utilize.

This report strives to complement our previous report released last November of 2013, "Accessing and Providing: Frontline Voices on Language Access," to make the case as to why District government needs to continue dedicating more time, infrastructure and budget towards improving the accessibility of public services for residents who are limited or non-English proficient. This fiscal year of 2014, OLA conducted a second round of interviews and surveys with non-profit employees in order to identify an updated set of areas of improvement and recommendations for Language Access services by DC government. As our next step, OLA will soon begin sharing this feedback with the DC government agencies and start another set of interviews, surveys and on-site observations at the next group of five prioritized government service centers. Altogether, this initiative strives to continue identifying Language Access issues and solutions in order to then work collaboratively with the agencies to implement concrete changes.

### IMPORTANT NOTE

Please note that the information presented in this report was generated from the perspective of one hundred seven (107) public-serving employees at fifty-four (54) Latino-serving non-profits in DC, each interviewed and surveyed by the Office on Latino Affairs from December 2013 to May 2014 of fiscal year 2014. Interviewees were not requested to provide extensive evidence to back up claims. All non-profit interviewees' feedback was implicitly focused upon services provided to Spanish-speaking LEP/NEP clients, unless otherwise noted. Given the sample size, this data is not statistically sound but insightful nonetheless. OLA's intention of this data collection was to identify areas of improvement and which DC government agencies have the most, as well as where technical support or consultation from OLA may be needed, in order to facilitate improved implementation of the Language Access Law's requirements.

Additionally, please note that the comparative data collected during the previous fiscal years 2012-2013 was generated from the perspective of sixty eight (68) interviews and surveys with frontline employees at twenty-nine (29) Latinoserving non-profits in DC, conducted by the Office on Latino Affairs from June to October of 2012. Some of these nonprofit employees and organizations overlap between these two sets of data, FY 2014 and FY 2012-2013, but some did not and many new employees and non-profits were also interviewed in FY 2014.

### **INTERVIEWS AND SURVEYS**

The approach to collecting data for this project involved face-to-face interviews with direct-service employees at Latino LEP/NEP serving non-profits, primarily those non-profits who were OLA grantees during fiscal year 2014 and thus already identified as serving DC's Latino population. The purpose of this approach is to go beyond analyzing self-reporting by government agencies and proactively request feedback on how to improve Language Access from those public-serving individuals who work directly with LEP/NEP clients on a regular basis and have first-hand experience assisting their clients with the navigation of procedures to obtain government services.

Questions asked during the interviews focused on any difficulties employees had when assisting their clients to navigate and access DC government services in Spanish and other languages, and suggestions for how to make it better. A written survey also accompanied each interview. The main focus areas for the interviews and surveys were based upon the main areas of compliance named in the Language Access Act. These include: data collection, translations, interpretation, bilingual staff, training, and outreach. OLA's three central questions in collecting this feedback from the community-based non-profits this fiscal year 2014 were:

- What are the difficulties when accessing Language Access services?
- At which government agencies and locations are these kinds of difficulties encountered?
- What are the specific changes that OLA can recommend DC government agencies to consider, in order to improve Language Access services?

For a full list of the DC non-profits interviewed during this fiscal year 2014 and last fiscal years 2012-2013, please see Appendices I and 2 respectively. To view a copy of the written survey implemented, please see Appendix 3.

Through meeting with these nonprofits and sparking open conversations about Language Access, issues encountered and how to make it better, OLA is also fostering Language Access oriented relationships with a network of Latino-serving nonprofits across the city. These open relationships keep OLA more informed of when nonprofits encounter Language Access related questions or concerns throughout the year, and also ensure that these nonprofits are well informed on how Language Access in DC government works and knowledgeable about the resources available. During each meeting with a nonprofit interviewee, OLA shared: a set of 20 "I Speak" cards in Spanish, OHR's Language Access Fact Sheet, OHR's Language Access Directory of all 33 agencies under the Act, OLA's Language Access Frequently Asked Questions, OLA's previous report on "Accessing and Providing: Frontline Voices on Language Access," OLA's Indices demographic report on "Latinos in DC," a DVD of OLA's "Language Access Public Service Announcement" video, and a copy of OLA's Guía de Servicios, a Spanish guidebook to DC government and nonprofit services.

### **FINDINGS**

In comparison to fiscal year 2012-2013, our second round of interviews and surveys to collect feedback on Language Access from nonprofit partners during fiscal year 2014 spanned a wider breadth of nonprofit organizations and programs: 107 individuals across 54 nonprofits (in comparison to 68 individuals across 29 nonprofits during FY 12-13). And the results are quite revealing. Similar agencies and issues came out on top, while some new patterns and encountered difficulties were brought to our attention as well.

OLA identified the FY 2014 main areas of difficulty and top ten agencies with the most areas of difficulty in regards to Language Access according to the results from the second question in the implemented survey, where nonprofit interviewees were asked to "Please identify the area(s) in which [they] have experienced the most difficulties in regards to Language Access and please list the agencies where [they] have encountered these difficulties." OLA tallied the number of times that each area of difficulty and each agency (of the 33 named under Language Access) was identified and marked by a nonprofit interviewee in response to this survey question. The results presented below represent those areas of difficulty and agencies with the highest tallies of being marked in response to this survey question.

When the non-profit workers interviewed in FY 2014 were asked on the survey to identify areas of improvement at the DC government agencies named under the Language Access Act, they identified five main areas of improvement: first, the lack of bilingual frontline staff; second, the customer service by frontline staff (e.g. discrimination, language services not provided); third, translated documents and information; fourth, outreach and awareness efforts, and fifth, navigation of the physical office and its signage.

With the exception of outreach and awareness efforts, these same main areas of improvement in the same descending order were most selected by our last set of non-profit workers interviewed by OLA during fiscal years 2012-2013. Overwhelmingly both sets of data, from FY 2014 and FY 2012-2013, identify the lack of bilingual staff as the greatest area of improvement for the provision of Language Access services by DC government. Please see Figures 2 and 3 below for graphs of these results.

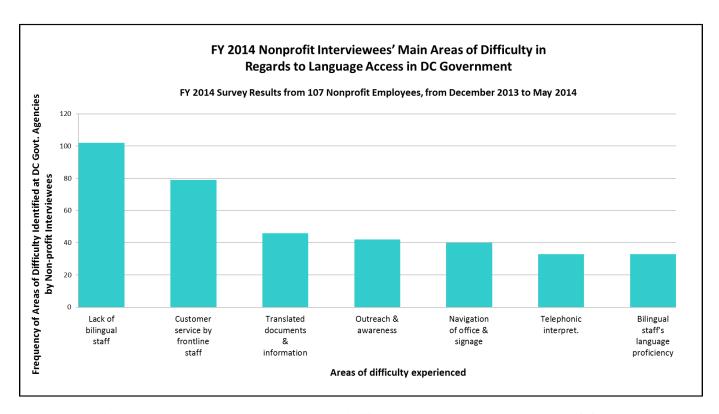


Figure 2. FY 2014 Nonprofit Interviewees' Main Areas of Difficulty in Regards to Language Access in DC Government.

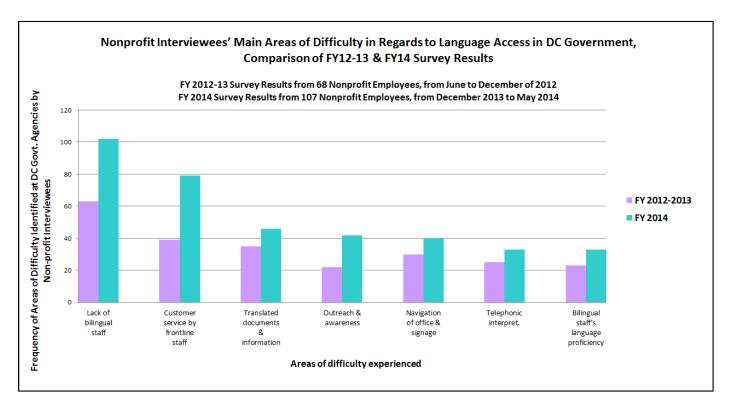


Figure 3. Non-Profit Interviewees' main areas of difficulty in regards to Language Access in DC government, comparison of FY 2012-2013 and FY 2014 survey results.

The survey results from the fiscal year 2014 non-profit interviewees also identified the following as the top ten agencies in need of improving Language Access services:

- 1. Department of Human Services (DHS)
- 2. Department of Consumer and Regulatory Affairs (DCRA)
- 3. DC Public Schools (DCPS)
- 4. Department of Motor Vehicles (DMV)
- 5. Department of Health (DOH)
- 6. Department of Behavioral Health (DBH / previously Department of Mental Health, DMH)
- 7. Metropolitan Police Department (MPD)
- 8. DC Housing Authority (DCHA)
- 9. Department of Employment Services (DOES)
- 10. Office of Tax and Revenue (OTR)

This data from the FY 2014 non-profit interviewees is fairly consistent with the data OLA collected from non-profit employees during FY 2012-2013. With the exception of the Office of Tax and Revenue (OTR) and the Department of Health (DOH), all of the top ten agencies identified by nonprofit interviewees as having the most areas of improvement in terms of Language Access during FY 2014 were also identified as within the top ten during FY 2012-2013. Please see Figures 4 and 5 below for graphs of these results. Please note that the variety of individuals and non-profits interviewed this FY 2014 may in small part have influenced this change in feedback. A different set of nonprofits and individuals interviewed will render a different set of data, although all involved in these projects were selected for interviews given their experiences serving DC's Latino population.

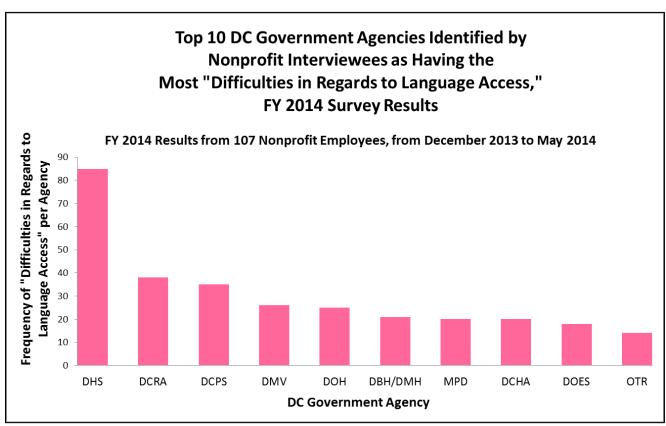


Figure 4. Top 10 DC government agencies identified by FY 2014 nonprofit interviewees as having the most "difficulties in regards to Language Access."

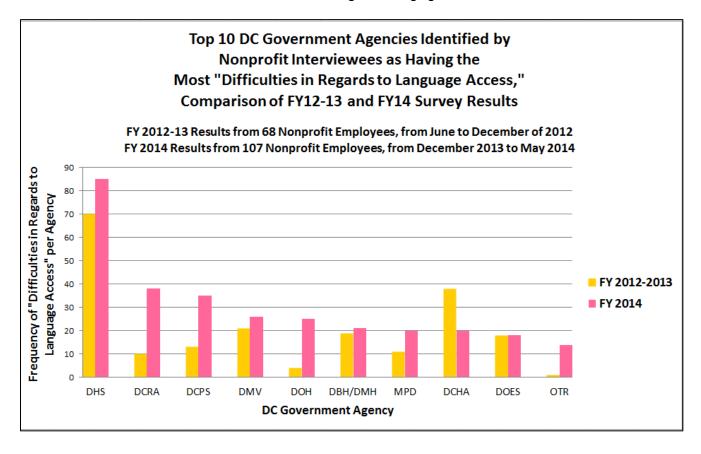


Figure 5. Top 10 DC government agencies identified by nonprofit interviewees as having the most "difficulties in regards to Language Access," comparison of FY 2012-2013 and FY 2014 survey results.

### **OLA'S RECOMMENDATIONS TO THE COVERED DC GOVERNMENT AGENCIES:**

In response to these survey results, supplemented by additional qualitative data collected through the interviews that accompanied each survey, the Office on Latino Affairs developed six main recommendations that OLA has in turn presented to the Language Access Coordinators at each prioritized government agency. The first five recommendations largely overlap with OLA's recommendations in our previous report, "Accessing and Providing: Frontline Voices on Language Access," given the overlap of feedback we received this fiscal year 2014 and last fiscal years 2012-2013, and the ongoing needs to continue improving DC Language Access services. The sixth recommendation is new, which addresses the need for each DC government agency covered under the law to have at least one full-time Language Access Coordinator without other position duties within the agency and to establish stronger internal supervision and enforcement of the provision of Language Access services.

Please note that a central purpose of this project was to provide agency-specific recommendations, given the uniqueness of each agency's services and methods of providing those services. Nonetheless a broader version of many of these recommendations can certainly be applied across agencies, and evidence from the FY12-13 and FY14 non-profit and government interviewees supports the reality that many agencies are encountering the same challenges when providing Language Access services. Our overall six recommendations are suggestions for agencies to work towards in minimizing these challenges, in order to better serve their limited or non-English proficient clients:

### 1. Hire more bilingual frontline staff and create more certified bilingual positions:

As mentioned earlier in this report under "Findings," both sets of data from nonprofit employees interviewed during FY 2014 and FY 2012-2013 overwhelmingly selected the lack of bilingual staff as the greatest area of improvement for the provision of Language Access services by DC government. Hiring more bilingual staff cuts down costs of extensive telephonic interpretation use (via Language Line, for example) and decreases the time to serve each client, with more staff on hand to serve both English and other language speakers. Having bilingual staff on hand may also serve as a resource for the agency to conduct quality control of translated information. According to feedback from nonprofit interviewees, direct communication through bilingual staff, rather than relying upon an interpreter, is also more likely to relay clearer information and develop more trust-building relationships with LEP/NEP clients.

Establishing more certified bilingual positions, with a slight pay grade increase, will encourage more competitive bilingual job-seekers to apply and will ensure that the individuals hired are in fact fully fluent in the pertinent languages. This bilingual certification opportunity may also encourage bilingual employees to maintain a longer term of employment, and ensure accountability and quality consistency when providing language services. The bilingual certification program at the DC Metropolitan Police Department, in place since 1999, could be utilized as a model for best practices.

When recruiting new bilingual staff, agencies should prioritize language skills according to the language(s) most often spoken by LEP/NEP clients being served or likely to be served at the center(s). Additionally, agencies should include written in the official job announcement if a position is "bilingual preferred" or "bilingual required," and stipulate for which language(s) and for what kind of language skills, e.g. spoken or written skills, translation or interpretation skills, they are seeking.

# 2. <u>Provide all frontline employees with more infrastructure, resources, and Language Access trainings</u> particular to their agency, including a mechanism to inquire language preference from every client:

If services are easier to provide, employees are more likely to provide them and have the time to provide them, especially in high-stress and high-volume customer service environments. Language Access is not just about non-English speakers receiving services, but also about ensuring that government employees have the resources and infrastructure to provide language services. More training on Language Access protocols – covering the areas of compliance under the

Act, the agency-specific protocols and resources, and how to use the telephonic interpretation services – assures that employees are prepared and knowledgeable when serving LEP/NEP clients. Many FY14 nonprofit employees that we interviewed also stressed the need for more cultural sensitivity and awareness among DC government frontline employees, to attempt to minimize tensions between people of varying ethnicities, races and spoken languages.

Each agency should also have an agency-wide mechanism for employees serving the public to inquire about the language preference of each and every client. If a LEP/NEP client does not tell the employee about his/her language needs or indicate it through use of an "I Speak" card, it can be very difficult for employees to identify if the client needs assistance in a non-English language, especially given that employees may be weary of being misinterpreted as profiling or discriminating the client. Thus, OLA recommends each government agency under Language Access to identify a way for employees to more proactively ask all of their clients to self-identify their language preference during the initial first point of contact and any additional intake procedures. For many agencies, requiring a separate "language preference for services" question during the beginning of the intake at the first point of contact is an effective way to identify language preference up front. Then each case can be tagged with that language preference so that future employees working with the client are aware and prepared for his/her language needs.

Additional infrastructure and resources could further assist frontline employees when serving clients who do not speak or understand English very well. More communication and regular discussion of Language Access issues between frontline and management employees, and regular visits to the customer service centers by senior level management would help track problems as they arise and keep management informed of any needed improvements. Agencies could also be more proactive in identifying language needs of clients. Also, dual handset phones (as shown in Figure 6 below) are a great resource for employees, to limit noise and privacy concerns when communicating with their clients through an interpreter via speaker phone, and to limit time spent when communicating with an interpreter by cumbersomely passing one handset back-and-forth with the client.



Figure 6. Photo of a Language Line dual handset phone at the Department of Motor Vehicles (DMV).

3. Prioritize new translations for legally binding forms, mailed notices requiring an immediate response from clients and overall service/resource guides; and make already translated materials easier to find in print and online:

Written language helps assure uniformity and facilitate sharing of information. Government agencies are constantly producing and sharing written information, such as resource guides, lists of documents necessary to apply for a service, or immediate notices informing a client that for example, a car will be towed or a business did not pass inspection. Given the large portion of LEP/NEP DC residents, government agencies are also constantly in need of sharing this information in various languages other than English. By translating written information into the languages most often spoken by LEP/NEP clients, and conducting trustworthy quality control of all translations (including uniformity of translated legal terms and document names), the agency safeguards itself from misinterpretation of information if the conveying from one language to another is done in the moment by a bilingual individual or interpreter without any

quality control. Even if the client is not fully literate, the written translation provides a baseline of translated information for the bilingual government or non-profit employee, or in-person interpreter to utilize.

When deciding what to translate, agencies should prioritize information-packed overall service/resource guides, documents that are legally binding, and notices that require an immediate response, including notices delivered via mail or email or placed on a vehicle/building. For delivered notices requiring an immediate response, if a translation is not feasible financially, a second option is to include a translated disclaimer listing a phone number e.g. "For free, you can request interpretation over the phone or in-person, and have some documents translated for you. Please call \_\_\_\_\_ if you do not understand or need help with this document." Before using the disclaimer, we recommend to first check that the person answering the phone number listed on the disclaimer will be able to respond quickly and provide information in those particular languages – for example, the agency could list a main office or customer service phone number for which all calls are answered during regular business hours and where the employees answering the phone have access to telephonic interpretation (through Language Line, for example) and/or are bilingual in those languages.

Translated information is only as useful as it is accessible. We recommend agencies to make translated forms, documents or other materials easily available both online and in print, for LEP/NEP clients and for the non-profit or government employees working with those clients to access. For example, for agencies with a daily high influx of limited English proficient clients, which rely upon paper applications or forms – keep hard copies of those forms printed out in the different languages most often needed, so an employee or a client may have easy access to a copy and skip the hassle of locating the document online and printing it out. Nonetheless, agency websites can also be a great platform for sharing translated information, especially agency-specific instructions that are good to know before going to a service center or submitting online applications.

The DC Office of Human Rights (OHR) recently launched a project in fiscal year 2013 with the Office of the Chief Technology Officer (OCTO) to make the websites of government agencies named under Language Access more accessible in the main languages spoken by their clientele. Through this project, numerous agencies have updated their websites to include a section which links out to summaries of their overall services in various languages. Please see Figure 7 below for an example of best practices of this section on the Office of the People's Counsel (OPC)'s website.



Figure 7. Screenshot of the top portion of Office of the People's Counsel (OPC)'s website page. Link: http://www.opc-dc.gov/

However, some of the agencies still have numerous translated materials buried within their other website pages written in English. We recommend that agencies post all of the translations available in each language on one page, i.e. all of the

translated information, brochures, fliers, forms, guides etcetera available in Spanish should all be posted to the page listed as "Español" (translation: "Spanish"). It would also be ideal if agencies could work towards making some of their online services more accessible in various languages, in addition to posting just translated text – for example, the online scheduling of an appointment with the DMV for a driver's license test, as seen in Figure 8 below.

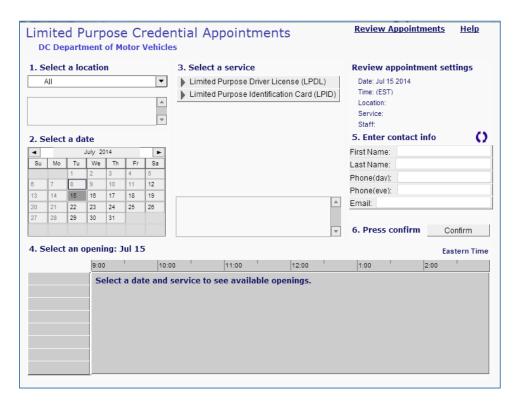


Figure 8. Screenshot of the online appointment scheduler for the Department of Motor Vehicles (DMV) Limited Purpose Drivers License.

Link: https://www.flashappointments.com/client/lgn/launch.cfm?busId=10140

# 4. <u>Promote available services and resources to LEP/NEP residents, including information on how to access and apply for available services and programs, through more multilingual outreach:</u>

We recommend agencies to conduct more outreach to limited and non-English proficient populations, so that they know about available services and that they are accessible in their language at no cost. This is especially important if a center never or rarely sees clients who speak different languages. This may be due to a lack of knowledge amongst residents that the center offers free language services. With the minimal exceptions of government services where English proficiency is required, such as federal restrictions when applying for a Commercial Driver's License, city services are relevant to many different sectors within DC's LEP/NEP populations. Furthermore, agencies are mandated by the Language Access Act to ensure that services are accessible to all city residents regardless of English proficiency. Before multilingual outreach efforts begin, agencies should first check that the services to be promoted are fully accessible in those languages. For example, agencies should not post signage in a language other than English advertising a website resource that is not available in those languages.

We recommend agencies to utilize demographic data, from the US Census or other sources, and collaborate with local partners to determine which populations to reach out to and target outreach efforts, and in which languages to translate outreach materials. If there are 7,768 Latino children under the age of ten living in DC, viii and an agency center providing children's services sees no Latino children, this could be due to a lack of information about available programs and resources at the center being provided to their parents – who may be limited in English proficiency. The DC Mayor's Offices on Latino Affairs, African Affairs and Asian and Pacific Islander Affairs, as well as local nonprofit

organizations may also assist in guiding an agency's outreach efforts and identification of various sectors of the population to target.

FY14 nonprofit interviewees also stressed the need to maintain more widespread awareness of the Language Access Act itself. Many nonprofit service-providers expressed concern that their own LEP/NEP clients may not know their right to receive information from DC government in their preferred language. Several organizations also requested presentations on Language Access for their clients. OLA has connected these organizations with the Office of Human Rights (OHR), which provides these Language Access presentations and trainings to nonprofits and their clients, as well as the general public and to DC government agencies' own employees.

### 5. Translate and post more multilingual signage, with a quality control mechanism:

Posting signage is a fairly quick means of making the physical space of a center easier to navigate, and given its shortness in length by nature, the language included in signage is generally low-cost to translate. Effective signage can help prevent clients from going to the wrong room or service center, or waiting in the wrong line. When translating new signage, we recommend agencies to prioritize translating and posting information on: service center locations and hours of operation (on the front doors, facing outwards); room names and a brief list of services available there; deposit box instructions, if applicable; and any pertinent notices, such as schedule or service changes or closings.

Multilingual signage can also create a welcoming environment, thus encouraging clients to self-identify their language needs, especially for those clients who do not understand English very well. We recommend agencies to prioritize translating and posting signage right at the first point of contact or at the agency's front desk, which reads "Free interpretation assistance is available; please ask at the front desk." Agencies must also utilize the desktop and poster signs created by the telephonic interpretation service, e.g. Language Line, as shown in Figure 8 below, and post copies of the "I Speak" cards created by the DC Office on Human Rights.

Languages for new translations of signage should be prioritized according to the languages spoken by those LEP/NEP populations most served or likely to be served by the agency. This is according to the requirement stated in the Language Access Act that once an agency reaches a threshold of 3% or 500 clients, whichever is less, who indicate a preference for a non-English language, the agency must provide translations of vital documents in that language. When creating new multilingual signage, just as when creating new documents in different languages, it is important to have a trustworthy quality control mechanism in place to ensure the accuracy of information being provided.



Figure 9. Photo of the front desk inside the Department of Motor Vehicles (DMV)'s Inspection Station.

Page | 12

6. <u>Hire at least one full-time Language Access Coordinator without other position duties within the agency and establish stronger internal supervision and enforcement of the provision of Language Access services:</u>

To a certain degree, a law is only as strong as it is enforced. Without more rigorous and systematic supervision and enforcement of the provision of services mandated by the Language Access Act, problems will continue occurring and go unseen until these issues escalate into formal complaints. Language Access should be stronger enforced organically by staff within the individual agency.

In order to enforce Language Access internally, each agency needs a more robust team of staff focused on Language Access services. The Language Access Coordinator position should be a full-time upper management position on its own, rather than coupled with another full time position at the agency. Currently very few Language Access Coordinators only serve in that one position; the overwhelming majority is further tasked by the multiple (and often primary) duties and responsibilities of another position, such as a training specialist, public information officer, or program manager. Furthermore, if an agency exceeds a certain number of clientele, the agency may need more than just one Language Access Coordinator but rather a team of individuals specifically working towards ensuring that all of that agency's services are accessible in various languages. The Language Access Coordinator and his or her team should be granted management-level status in the organization and develop a feasible and strong strategy for implementing, supervising and enforcing Language Access within their agency. In particular, this strategy should include regular unscheduled site visits of all service centers during business hours to observe customer service interactions, to better understand how language services are being rendered in practice and to adjust protocols and procedures accordingly to provide the best service to their agency's LEP/NEP clients.

### **CONCLUSION & NEXT STEPS**

This project is part of an ongoing initiative that the Office on Latino Affairs (OLA) began in fiscal year 2012 to more proactively collect feedback on how Language Access services are provided to limited and non-English proficient (LEP/NEP) residents by DC government agencies named under the Language Access Law. During last fiscal year 2013 into fiscal year 2014, the Office on Latino Affairs has collaborated and worked extensively with the Department of Human Services (DHS), DC Housing Authority (DCHA), Department of Motor Vehicles (DMV), Department of Behavioral Health (DBH/DMH), Department of Employment Services (DOES) and Metropolitan Police Department (MPD) – agencies prioritized according to the last set of data collected from nonprofit interviewees during fiscal years 2012-2013.

Our next step will be presenting these new results and working collaboratively with a new set of prioritized DC government agencies to find agency-specific solutions and work towards implementing tangible changes. Thus, for the remainder of this fiscal year 2014, OLA plans to begin working closely with the next five agencies prioritized according to the feedback from the FY14 nonprofit interviewees: Department of Consumer and Regulatory Affairs (DCRA), DC Public Schools (DCPS), Department of Health (DOH), Office of Tax and Revenue (OTR) and Department on Disability Services (DDS). Additionally, as part of the work it accomplishes through its Language Access and Advocacy program, OLA will share the overall recommendations and continue providing technical support to all thirty-three DC government agencies currently named under the Language Access Act.

Please direct all inquiries about this document to the Office on Latino Affairs, Language Access and Advocacy Program: Cecilia Castillo Ayometzi, Ph.D., Language Access and Advocacy Coordinator, <a href="mailto:Cecilia.Castillo@dc.gov">Cecilia.Castillo@dc.gov</a>, and Kelsey Chatlosh, Language Access Monitor, <a href="mailto:Kelsey.Chatlosh@dc.gov">Kelsey.Chatlosh@dc.gov</a>, July 2014.

# **APPENDICES**

### APPENDIX I, FY 2014 LIST OF DC NON-PROFITS INTERVIEWED:

The Office on Latino Affairs (OLA) conducted one hundred seven (107) face-to-face interviews and surveys with frontline employees across fifty four (54) Latino LEP/NEP serving DC non-profits (primarily OLA grantees during fiscal year 2014), from December 2013 to May 2014. Each interview was also accompanied by a written survey – please see Appendix 3 to view the survey conducted with the non-profit employees.

Below is a list of all these non-profits, followed by the number of individuals interviewed at each, in alphabetical order:

826DC (I) Latino Economic Development Center (2) Latino LGBT History Project (2) Andromeda (1) Ayuda (6) Latino Student Fund (2) Barbara Chambers Children's Center (2) \*Legal Aid Society (3) Legal Counsel for the Elderly (2) Big Brothers Big Sisters (1) Bread for the City (1) Many Languages One Voice (1) Maru Montero (1) Byte Back (I) CARECEN Latino Resource & Justice Center Mary's Center (4) (3) Mi Casa Inc. (2) Multicultural Career Intern Program (2) Casa Ruby (1) Catholic Charities, Spanish Catholic Center (4) Multicultural Community Service (2) Caucus Salvadoreño Empresarial (1) Nueva Vida (1) Centro de Alfabetización en Español (I) Planned Parenthood (I) CentroNía (2) Quality Trust (1) SAFE DC, Survivors and Advocates for City Blossoms (2) DC Doors (4) Empowerment, Inc. (2) DC Scores (9) San Miguel School (1) Dialogue on Diversity (1) Spanish Education Development Center (1) GALA Theater, Paso Nuevo (I) Teaching for Change (I) Greater Washington Hispanic Chamber of Teatro de la Luna (2) The DC Center (I) Commerce (6) Hola Cultura, DC Arts (I) The Family Place (4) Housing Counseling Services (2) Vida Senior Centers (2) Washington Ballet, Dance DC (3) Institute for Student Health (1) Jubilee Jumpstart (6) Washington DC Youth Rugby (I) Kid Power Inc. (1) Washington English Center (previously named: La Clínica del Pueblo (1) Language Etc.) (3) La Trenza Leadership (1) Young Playwright's Theater (I) Latin American Youth Center (I)

<sup>\*</sup>Please note that the Legal Aid Society of DC is the only organization included above that did not receive an OLA grant during FY 2014.

### APPENDIX 2, FY 2012-2013 LIST OF DC NON-PROFITS INTERVIEWED:

The Office on Latino Affairs (OLA) conducted sixty-eight (68) face-to-face interviews with frontline employees across twenty-nine (29) Latino LEP/NEP serving DC non-profits (primarily OLA grantees during fiscal year 2012), from June to October of 2012. Each interview was also accompanied by a written survey – please see Appendix 3 to view the survey conducted with the non-profit employees.

Below is a list of all these non-profits, followed by the number of individuals interviewed at each, in alphabetical order:

Andromeda (4) Jubilee Jumpstart (1) ARRIBA Center (2) La Clínica del Pueblo (3) Ayuda (1) Latin American Youth Center (2) Bread for the City (3) Latino Economic Development Center (3) Byte Back (3) \*Legal Aid Society (2) Capital Area Asset Builders (3) Legal Counsel for the Elderly (1) LIFT-DC (3) CARECEN Latino Resource & Justice Center (2) Catholic Charities (1) Mary's Center (2) Centro de Alfabetización en Español (1) Mi Casa Inc. (2) CentroNía (2) National Housing Trust, Meridian Manor (3) Columbia Heights Shaw Family Support Planned Parenthood (I) Collaborative (1) Quality Trust (1) DC Doors (2) Teaching for Change (I) DC lobs with Justice (3) The Family Place (4) Housing Counseling Services (3) VIDA Senior Center (8)

<sup>\*</sup>Please note that the Legal Aid Society of DC is the only organization included above that did not receive an OLA grant during FY 2012.

### **APPENDIX 3, SURVEY CONDUCTED WITH NON-PROFIT EMPLOYEES:**

### Feedback on Language Access

\*DISCLAIMER: For this questionnaire, the Office on Latino Affairs would like to hear more about the organization's experience working with DC government agencies named under Language Access.

- 1. Please circle which DC government agencies listed below that you work with the most, in order to serve your clients.
  - Department of Health (DOH)
  - 2. Department of Human Services (DHS)
  - Department of Employment Services (DOES)
  - 4. Metropolitan Police Department (MPD)
  - 5. DC Public Schools (DCPS)
  - 6. Office of Planning (OP)
  - 7. Fire and Emergency Medical Services (FEMS)
  - 8. Office of Human Rights (OHR)
  - Department of Housing and Community Development (DHCD)
  - 10. Department of Mental Health (DMH)
  - 11. Department of Motor Vehicles (DMV)
  - 12. Child and Family Services Agency (CFSA)
  - 13. Alcoholic Beverage Regulation Administration (ABRA)
  - 14. Department of Consumer and Regulatory Affairs (DCRA)
  - 15. DC Human Resources (DCHR)
  - 16. DC Public Libraries (DCPL)
  - 17. Department of Parks and Recreation (DPR)
  - 18. Department of Corrections (DOC)

- Office of Contracting and Procurement (OCP)
- 20. Department of Public Works (DPW)
- 21. Office of Tax and Revenue (OTR)
- 22. DC Office on Aging (DCOA)
- 23. DC Housing Authority (DCHA)
- 24. Homeland Security and Emergency Management Agency (HSEMA)
- 25. Office of the People's Counsel (OPC)
- 26. Department of Disability Services (DDS)
- 27. District Department of Transportation (DDOT)
- 28. Office of United Communications (OUC)
- 29. District Department of the Environment (DDOE)
- 30. Office of the State Superintendent of Education (OSSE)
- 31. Department of Small and Local Business Development (DSLBD)
- 32. DC Office of Zoning (DCOZ)
- 33. Office of the Tenant Advocate (OTA)
- 34. DC Lottery (DCLB)

Language Access and please list the agencies where you have encountered these difficulties. (Please choose agencies from the list in question (1) above.) [Area(s) of difficulty experienced] [List agencies where difficulty encountered] A. Translated documents and information Agency(s): \_\_\_\_\_\_ B. Telephonic interpretation Agency(s): \_\_\_\_\_\_ Agency(s): C. Lack of bilingual staff D. Bilingual staff's language proficiency Agency(s): \_\_\_\_\_\_ Agency(s): \_\_\_\_\_\_ E. Customer service by frontline staff Agency(s): F. Navigation of the physical office space G. Outreach and awareness efforts Agency(s): \_\_\_\_\_\_ H. Other: Agency(s): \_\_\_\_\_\_ I. Other: \_\_\_\_\_ Agency(s): \_\_\_\_\_\_ Other: \_\_\_\_\_ Agency(s): \_\_\_\_\_\_

2. Please identify the <u>area(s)</u> in which you have experienced the <u>most difficulties</u> in regards to

3.	Do you have any <u>formal or informal agreement(s)</u> with any DC government agency(s) to provide their clients with interpretation, translation or other language services?  For example, to have a satellite location at a DC government agency center, with multilingual staff to serve non-English speaking clients. Or, to promote a DC government program and facilitate applications. (Please choose agencies from the list in question (1) above.)
	No / Not Applicable
	If yes, please explain—
	For which agency(s):
	Kind of agreement / services or resources provided:
4.	Additional comments, questions or concerns about Language Access services by DC government agencies:
<u>CONTACT</u> : If we have any questions or clarifications regarding this Language Access questionnaire, where may we contact you?	
Naı	me: Position Title:
No	nprofit: Phone:
Em	ail:
Are	e you bi/multilingual? Yes—I speak: No
Would you be interested to be involved in group of individuals across Latino LEP/NEP-serving DC organizations focused on improving Language Access services and resources?  Yes No	

### **ENDNOTES:**

- "Language Access Act of 2004," DC Office on Human Rights, accessed June 17th, 2014, <a href="http://ohr.dc.gov/sites/default/files/dc/sites/ohr/publication/attachments/LanguageAccessActof2004-English.pdf">http://ohr.dc.gov/sites/default/files/dc/sites/ohr/publication/attachments/LanguageAccessActof2004-English.pdf</a>
- For a list of the thirty-three agencies named under the DC Language Access Act, including Language Access Coordinators at each agency, please visit: <a href="http://ohr.dc.gov/publication/language-access-coordinator-list">http://ohr.dc.gov/publication/language-access-coordinator-list</a>
- To view the full report, "Accessing and Providing: Frontline Voices on Language Access," please visit: <a href="http://ola.dc.gov/publication/frontline-voices-language-access">http://ola.dc.gov/publication/frontline-voices-language-access</a>
- iv To view a written copy of the full survey implemented, please see Appendix 3.
- <sup>v</sup> Please note that we interviewed a different set of non-profit employees during FY2014 in comparison to FY 2012-2013, although many overlapped. To view each set, please view Appendixes 1 and 2. For more information on the results of the FY 2012-2013 data please see our last report at: http://ola.dc.gov/publication/frontline-voices-language-access.
- vi To view the full report, "Accessing and Providing: Frontline Voices on Language Access," please visit: <a href="http://ola.dc.gov/publication/frontline-voices-language-access">http://ola.dc.gov/publication/frontline-voices-language-access</a>
- "" "OHR 2013 Annual Compliance Review, Language Access in the District," DC Office on Human Rights, accessed June 17th, 2014, https://www.dropbox.com/s/0t8ge3g9z4y664u/LA Report FINAL HQ 021014.pdf
- "" "Profile of General Population and Housing Characteristics: 2010, 2010 Census Summary File 2: Washington city, District of Columbia, Hispanic or Latino (of any race) (200-299)," American FactFinder, US Census Bureau, accessed September 19th, 2013, <a href="http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC\_10\_SF2\_SF2DP1&prodType=table">http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC\_10\_SF2\_SF2DP1&prodType=table</a>
- ix For more information of the use of the "I Speak" cards, please visit: http://ohr.dc.gov/languageaccess