



## Language Access Implementation Plan

The Language Access Implementation Plan explains how the agency will provide services to people who have limited English proficiency (or LEP).

Agency name: New York City Administration for Children's Services

Language Access Coordinator name: Lauren H. McSwain

Language Access Coordinator title: Director, Immigrant Services and Language Affairs

Published date: *June 10, 2024*

This Plan includes information about:

1	<a href="#">Agency mission and services</a>	
2	<a href="#">Agency language access policy</a>	
3	<a href="#">Language access needs assessment</a>	How the agency assesses the language access needs of the people it serves
4	<a href="#">Notice of the right to language access services</a>	How the agency notifies the public about their right to language access services
5	<a href="#">Provision of language services</a>	What language services the agency provides
6	<a href="#">Resource planning</a>	How the agency ensures that it has the internal and external resources to provide language services
7	<a href="#">Training</a>	How the agency trains the staff to provide language services
8	<a href="#">Continuous improvement planning</a>	How the agency ensures ongoing improvement of language access
9	<a href="#">Goals and actions planning</a>	How the agency will put the plan into action

**Signatures**



6/5/2024

---

Lauren H. McSwain Date  
Director, Immigrant Services and Language Affairs, NYC Administration for Children's Services



06/05/2024

---

Jess Dannhauser Date  
Commissioner, NYC Administration for Children's Services



## Section 1. Agency mission and services

The Administration for Children's Services (ACS) protects and promotes the safety and well-being of New York City's children and families by providing child welfare and juvenile justice services, child care assistance, and other community supports so families and children can thrive. ACS contracts with nonprofit organizations to support families and young people, prevent foster care placement and provide foster care services for children not able to remain safely at home.

ACS has a workforce of approximately 6,000 employees, who help carry out the agency's mission to protect children and support families. Below are just a few of the public facing divisions within ACS that serve the New York City LEP and deaf/hard of hearing communities:

- **Division of Child Protection (DCP)** responds to approximately 50,000 reports annually<sup>i</sup> involving allegations of child abuse and neglect received from the New York State Central Register of Child Abuse and Maltreatment (SCR). The division is comprised of approximately 3,500 employees, including Child Protective Specialists (CPS), spread across the five boroughs at nineteen sites. DCP staff investigate reports of child abuse and neglect, take action to keep children safe and help keep families together by providing supportive services.
- **Division of Family Permanency Services (FPS)** ensures that high quality services are provided to children in foster care by contracting for, overseeing, and monitoring foster care provider agencies. Services provided by such agencies include family-based foster care and residential foster care. FPS staff offer guidance to provider agencies on child welfare policies and procedures to improve service delivery and achieve safety, permanency, and well-being for children in foster care.
- **Division of Prevention Services (DPS)** oversees the delivery and monitoring of community-based prevention services for children and families through our contracted provider agencies. These services are aimed at providing families with the services they need to keep their children safe and for families to be supported and strong. ACS's prevention and family home care services address trauma associated with generational poverty and prevent child maltreatment and neglect by addressing the challenges families face, building upon caregivers' protective factors, and enabling them to provide a healthy and supportive environment in which to raise children.
- **ACS's Division of Youth and Family Justice (DYFJ)** provides a comprehensive juvenile justice continuum of services for youth and families in New York City.. The goals of DYFJ are to build stronger and safer communities and advance public safety by preventing juveniles from entering the New York City's juvenile justice system, to provide therapeutic treatment and services to youth in our custodial care, and to help juveniles develop the tools to leave the justice system for good. DYFJ strives to help families and young people by providing supportive services that are responsive to the needs of individual youth and families. ACS, through DYFJ, provides community-based services and operates two secure detention facilities (one in the Bronx and one in Brooklyn). DYFJ also oversees 7 nonsecure detention facilities and a network of Close to Home providers operating group-home facilities for juvenile delinquents placed by the Family Court.

- **Division of Child and Family Well-Being (CFWB)** provides access to quality resources and opportunities that promote child and family well-being, enhance families' capacity to thrive, and helps minimize child welfare system involvement. Our work includes the provision of child-care assistance to families to help families afford quality care; the development and execution of strategies to prevent child injury and promote child safety; and the investment in community-based approaches to enhance well-being of children, caregivers and communities. These approaches include processing child-care voucher applications through the MyCity portal and overseeing 11 Community Partnerships and a network growing to 30 Family Enrichment Centers. From 2020-2023, over 47,000 children each year were using vouchers for child care.<sup>ii</sup>
- **The Nicholas Scoppetta Children's Center (Children's Center)** is operated by ACS and provides a temporary residence for children and youth coming into foster care until a foster care placement is found. Some of these children have the need for language access services (often on-site interpretation and/or sign language).

ACS staff regularly interact with the community in-person services in a variety of settings, such as care facilities, home visits, conferences, and in-office appointments, as well as community events, presentations, and trainings. ACS staff also conduct virtual conferences and events through video platforms, as well as telephonic communications with families with ACS involvement and through information lines for assistance with applying for child care and other services. ACS also provides information resources through brochures, handbooks, flyers, public service ad campaigns, and also communicates with the public through press releases, the ACS website and social media posts on X, Facebook, Instagram, and LinkedIn.

## Section 2. Agency language access policy

ACS seeks to administer equitable child welfare and juvenile justice systems in which a child or family's race, ethnicity, national origin, immigration status, language, gender, gender identity/gender expression and sexual orientation do not predict how they fare. As part of these equity goals, ACS is committed to ensuring that New York City's children and families with limited English proficiency have equal access to all programs and services provided by ACS and our contracted prevention services and foster care agency providers. These goals are facilitated by ACS by providing interpretation in over 240 languages, translating commonly distributed public facing documents into the 10 priority Citywide languages required by Local Law 30 (Spanish, Chinese, Bengali, Russian, Arabic, Urdu, Haitian Creole, Korean, Polish and French), and translating other important agency documents, such as case conferencing documents, as needed. All language access services are free to NYC families.

ACS's Language Access Policy is integral to the Agency's mission to promote the safety and well-being of all NYC children and ensuring NYC families have access to our programs and services. Quality and timely language access services enable the effective and constructive interactions between staff and families that are needed for improving outcomes for children and families. Individuals should not face obstacles to receiving any ACS services for which they may be eligible because they do not speak, understand, or read and/or write English. Similarly, the outcome of an ACS child protective investigation must not be impacted by the language a family speaks. ACS requires implicit bias training for all staff and provides continual discussion and learning opportunities about race, diversity, intersectionality, oppression, and systemic racism.

The Language Access Policy unifies and builds upon previous division-specific policies and incorporates recent developments in the law. The Policy underscores that it is ACS and provider agency staff's responsibility to inform families of their right to free interpretation and to ask their language of preference for communication. The Policy lays out which type of interpretation is suitable for different situations (e.g. in-person should be used for pre-planned, longer interactions and telephonic interpretation is suitable for shorter, unplanned interactions) and which documents must be translated. In addition, the Policy has the contact information for ACS Language Access Services ([language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov)) and how to make complaints about interpretation or translation services.

## Section 3. Language access needs assessment

### Factor 1: The number or proportion of LEP persons in the eligible service population

According to Census data referenced in the Mayor’s Office of Immigrant Affairs (MOIA) 2022 Annual Report, 22% of New Yorkers are limited-English proficient (LEP).<sup>iii</sup>

Another helpful source of data on NYC’s LEP population is the American Community Survey, which breaks down the three most common languages spoken at home by LEP populations, according to their NYC borough:

#### Top 3 Languages Spoken at Home by the Limited English Proficiency (LEP) Population 5 Years and Over New York City and Boroughs, 2017-2021

		LEP Population 5 Years and Over			
Rank		Language	Estimate	MOE	CV
1	<b>New York City</b>	<b>Spanish</b>	<b>865,331</b>	<b>11,018</b>	<b>0.774</b>
2	<b>New York City</b>	<b>Chinese (incl. Mandarin, Cantonese, and Min Nan Chinese)</b>	<b>337,286</b>	<b>6,478</b>	<b>1.168</b>
3	<b>New York City</b>	<b>Russian</b>	<b>117,404</b>	<b>4,159</b>	<b>2.153</b>
1	Bronx	Spanish	287,626	5,783	1.222
2	Bronx	Bengali	10,597	1,263	7.246
3	Bronx	French	9,028	1,413	9.516
1	Brooklyn	Spanish	164,310	5,441	2.013
2	Brooklyn	Chinese (incl. Mandarin, Cantonese, and Min Nan Chinese)	122,670	3,616	1.792
3	Brooklyn	Russian	87,591	3,420	2.374
1	Manhattan	Spanish	135,441	3,559	1.597
2	Manhattan	Chinese (incl. Mandarin, Cantonese, and Min Nan Chinese)	47,448	2,765	3.543
3	Manhattan	French	5,794	1,179	12.368
1	Queens	Spanish	262,591	5,262	1.218
2	Queens	Chinese (incl. Mandarin, Cantonese, and Min Nan Chinese)	148,793	4,416	1.804
3	Queens	Bengali	41,626	2,934	4.285
1	Staten Island	Spanish	15,363	1,617	6.399
2	Staten Island	Chinese (incl. Mandarin, Cantonese, and Min Nan Chinese)	14,763	1,656	6.818
3	Staten Island	Russian	7,905	1,156	8.889

**Notes:**

[ACS data are derived from a survey and are subject to sampling variability. Data shown in gray have poor statistical reliability \(guidance on ACS data\).](#)

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Public Use Microdata Sample  
Population Division-New York City Department of City Planning

**Factor 2: The frequency with which LEP individuals come into contact with the agency**

Primary Language of Individuals Involved in State Central Register (SCR) Reports<sup>1</sup>, CY23 and CY 22 for NY State

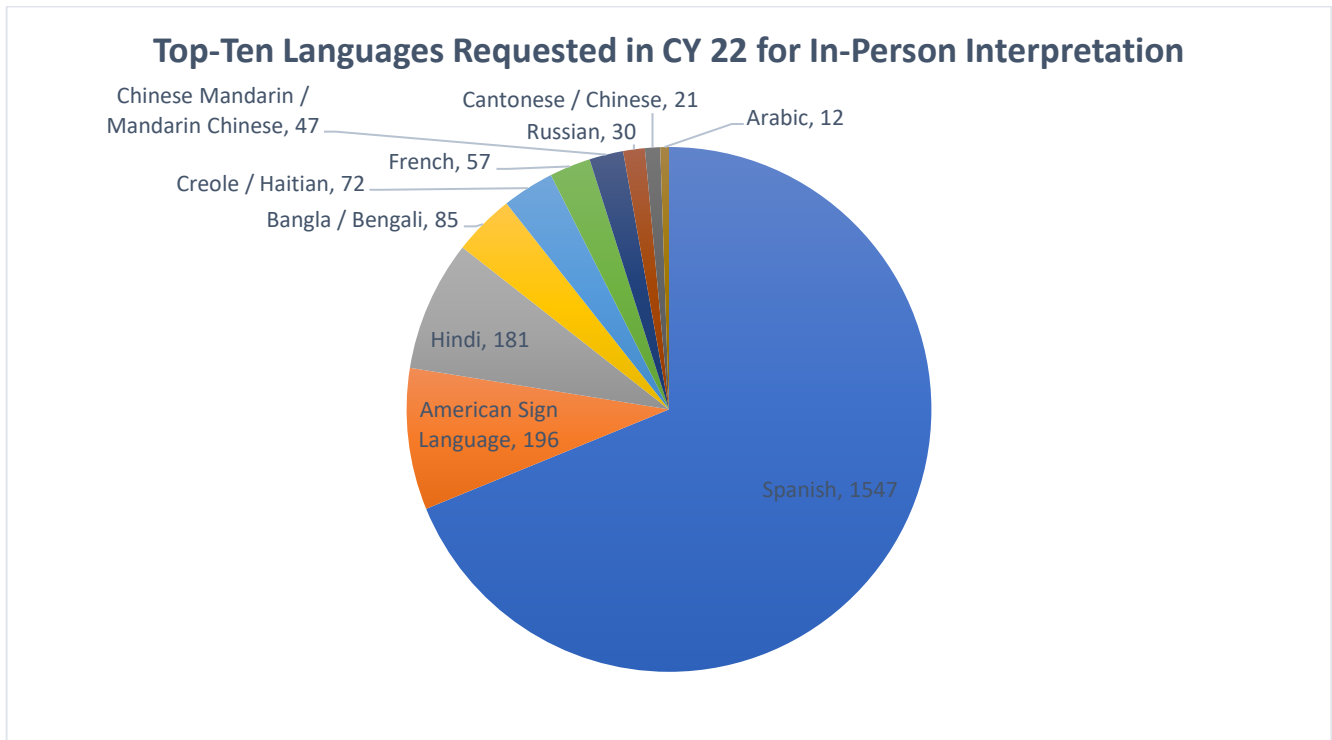
Language	# Persons in CY23	% of Total	Language	# Persons in CY22	% of Total
Albanian	47	0.0%	Albanian	24	0.0%
Amer Sign	82	0.0%	Amer Sign	96	0.0%
Arabic	352	0.2%	Arabic	535	0.3%
Bengali	620	0.3%	Bengali	701	0.4%
Bosnian	5	0.0%	Bosnian	1	0.0%
Braille	7	0.0%	Braille	5	0.0%
			Cambodian	4	0.0%
Cantonese	217	0.1%	Cantonese	224	0.1%
Chinese	206	0.1%	Chinese	225	0.1%
Creole	350	0.2%	Creole	322	0.2%
Czech	3	0.0%	Czech	5	0.0%
English	155420	82.9%	English	167714	86.1%
Ethiopian	15	0.0%	Ethiopian	16	0.0%
Farsi	21	0.0%	Farsi	17	0.0%
Filipino	4	0.0%	Filipino	12	0.0%
French	206	0.1%	French	165	0.1%
Fujianese	12	0.0%	Fujianese	20	0.0%
Fulani	31	0.0%	Fulani	30	0.0%
			German	1	0.0%
Greek	1	0.0%	Greek	10	0.0%
Gujarati	1	0.0%	Gujarati	3	0.0%
Hebrew	7	0.0%	Hebrew	13	0.0%
Hindi	24	0.0%	Hindi	29	0.0%
Italian	11	0.0%	Italian	4	0.0%
Japanese	19	0.0%	Japanese	16	0.0%
			Khmer	2	0.0%
Korean	49	0.0%	Korean	45	0.0%
Laotian	1	0.0%	Laotian	1	0.0%
Mandarin	1069	0.6%	Mandarin	1058	0.5%
Multiple	1193	0.6%	Multiple	1284	0.7%
Nat Am Lan	3	0.0%	Nat Am Lan	2	0.0%
Nigerianlbo	2	0.0%	Nigerianlbo	8	0.0%
			Patois	3	0.0%
Polish	40	0.0%	Polish	43	0.0%
Portuguese	22	0.0%	Portuguese	15	0.0%
Punjabi	63	0.0%	Punjabi	71	0.0%
Romanian	52	0.0%	Romanian	41	0.0%
Russian	553	0.3%	Russian	448	0.2%
SerboCroat	9	0.0%	SerboCroat	17	0.0%
Spanish	23770	12.7%	Spanish	18740	9.6%
Tagalog	15	0.0%	Tagalog	5	0.0%
Unknown	2652	1.4%	Unknown	2689	1.4%
Urdu	154	0.1%	Urdu	172	0.1%
Vietnamese	20	0.0%	Vietnamese	17	0.0%

<sup>1</sup> State Central Register (SCR) Reports are reports made to the state-run hotline to report allegations of child abuse or neglect.

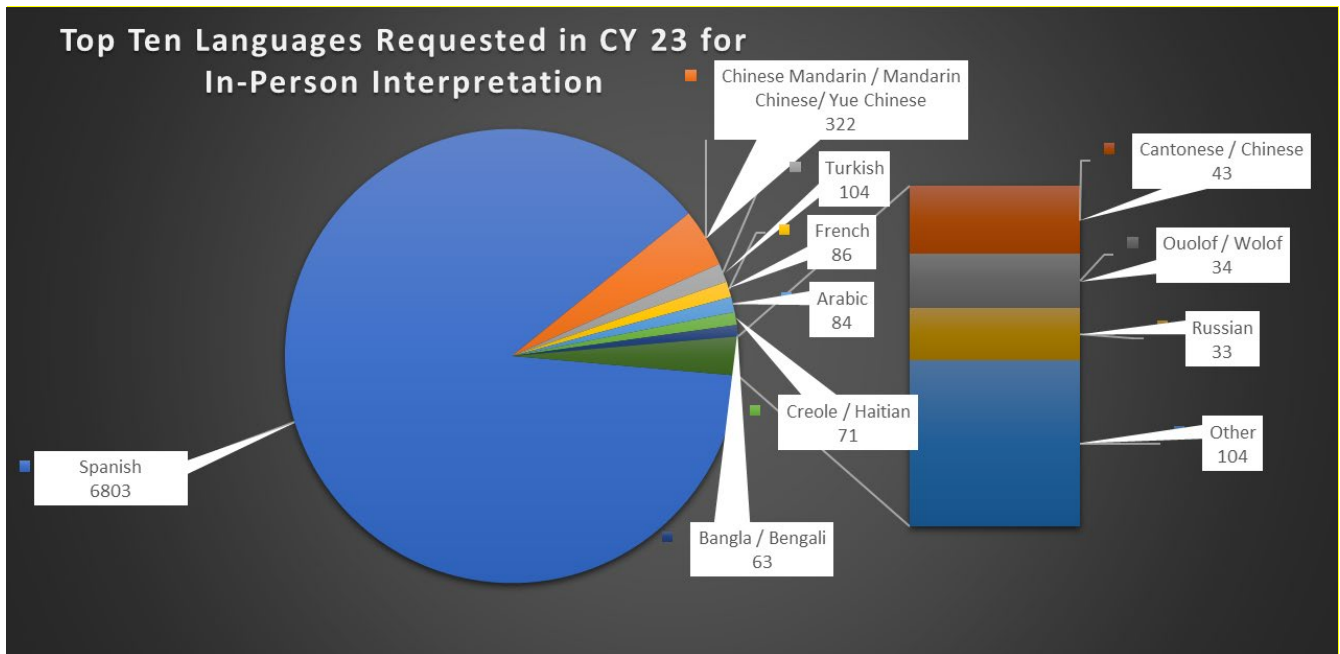
Yiddish	51	0.0%		Yiddish	31	0.0%
Total	187379			Total	194884	

Data Source: CNNX as of 2/7/24

Data Source: CNNX as of 1/30/23



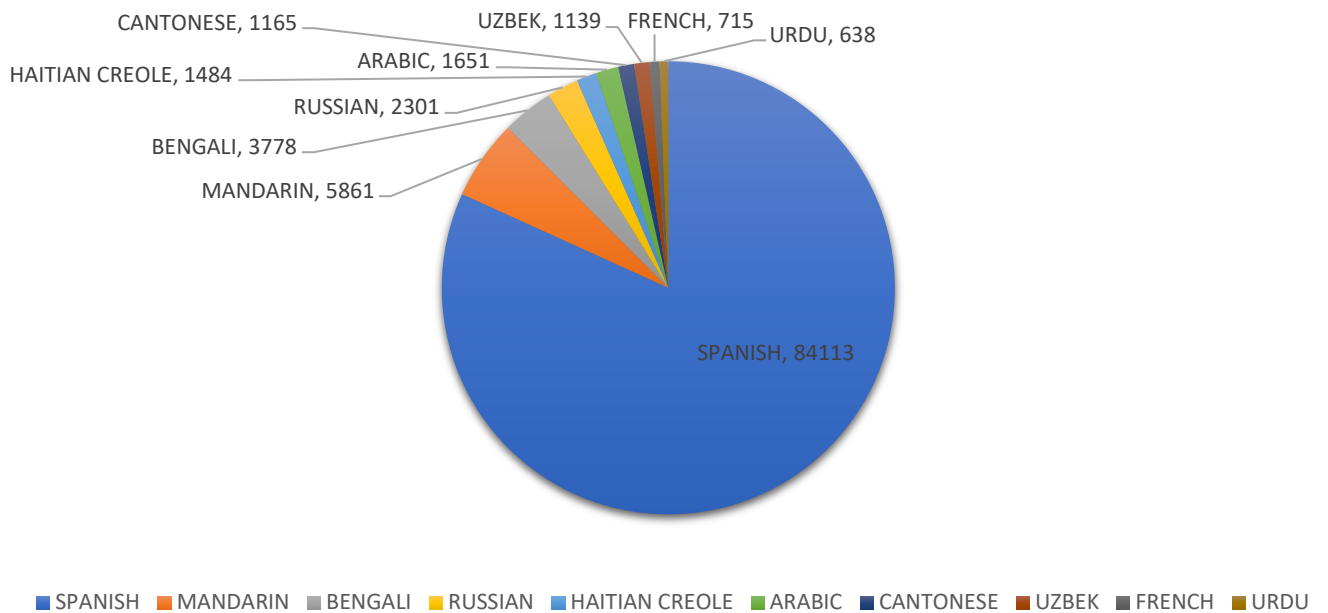
Source: Accurate Communication



Source: Accurate Communication

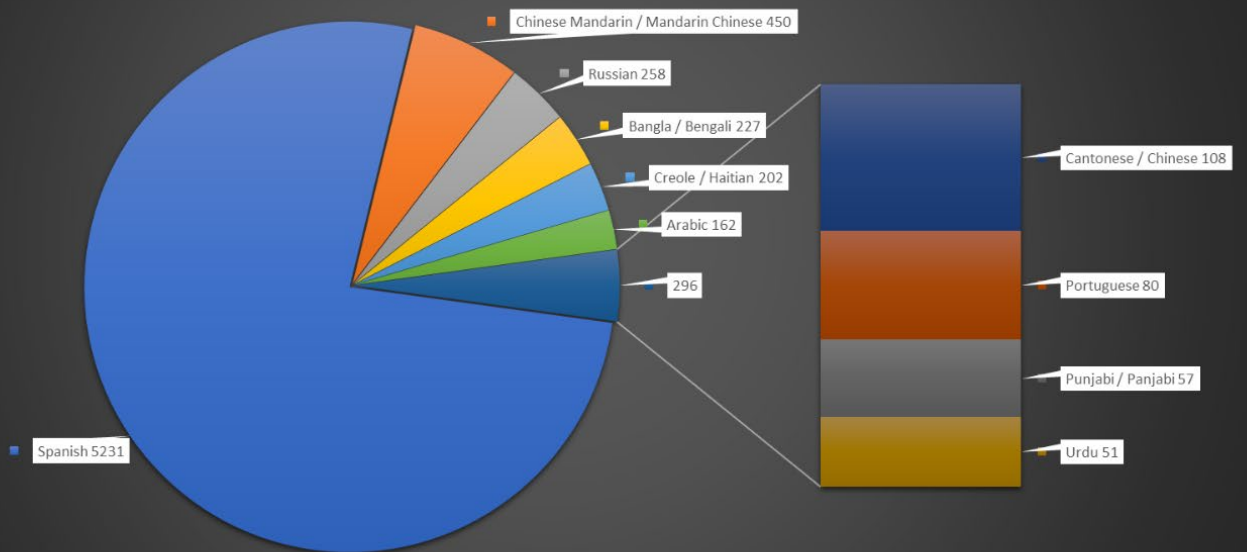


## Top Ten Languages Requested in CY 22 for Video Remote Interpretation



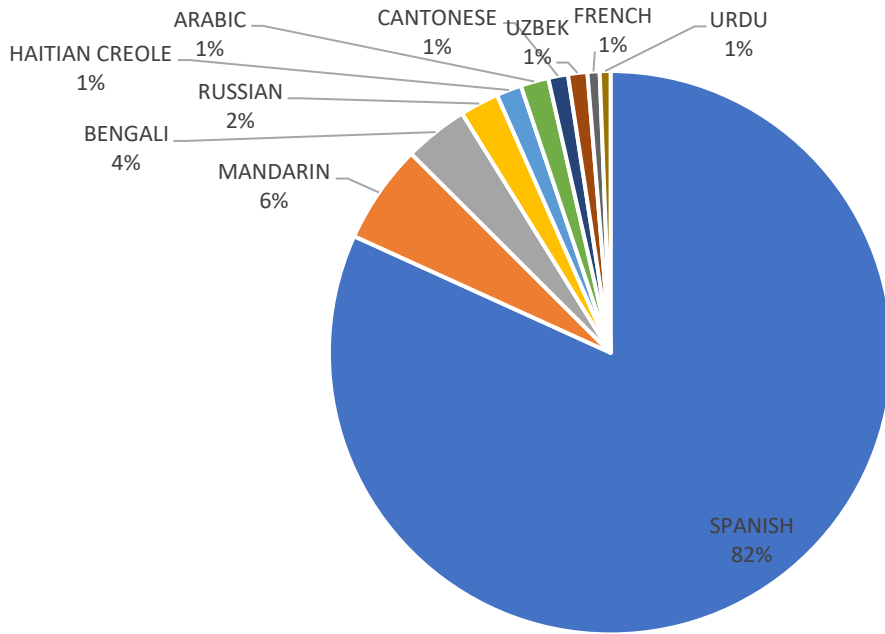
Source: Accurate Communication

## Top Ten Languages Requested in CY 23 for Video Remote Interpretation



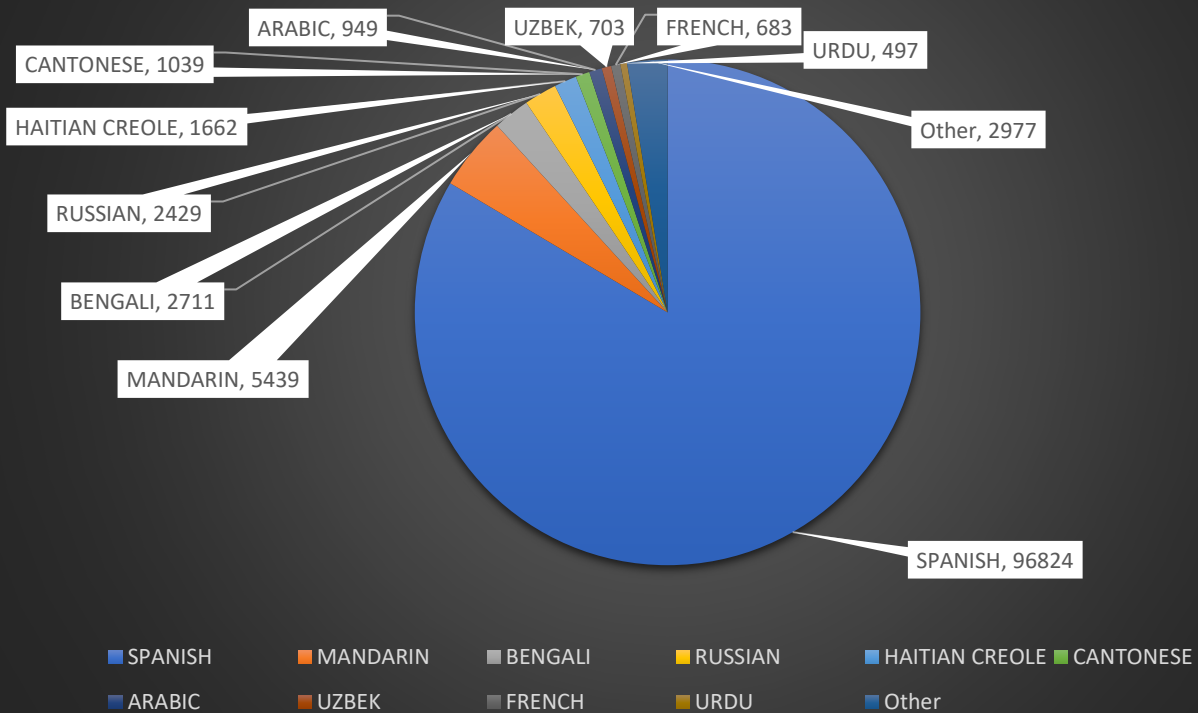
Source: Accurate Communication

### Top Ten Languages Requested for Telephonic Interpretation in CY2022



Source: Language Line Solutions

### Top Ten Languages Requested for Telephonic Interpretation in CY2023



Source: Language Line Solutions

Trends in the language data from each year can reflect changes in the general LEP population of NY state and New York City, but can also reflect shifts of agency practice, such as an increase in in-person meetings instead of video remote meetings, as well as an increase number of ACS staff certified to conduct work in a language other than English.

**Factor 3: The importance of the benefit, service, information, or encounter to the limited English proficient person**

Providing meaningful and accessible language services is vital to ACS’s mission of promoting the safety and wellbeing of all NYC children. Much of ACS’s work with families is rooted in a family engagement model, which requires collaboration between the child welfare professional and the families we serve. In order to be successful, families must have the ability to fully participate in the process and there must be trust between the parties. As such, meaningful communication through quality and easily accessible interpretation and translation is necessary for ACS’s model of work. ACS is constantly striving to improve the quality of our language services and minimize barriers to receiving those services.

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

ACS has one of the largest investments in language access vendor services of any City agency. We provide in-person, video-remote (VRI), on-site Spanish and telephonic interpretation, sign language services, and written translation through two different vendors: Accurate Communication and Language Line. Frontline staff receive training on how to access language services during onboarding and receive periodic refresher trainings. ACS Immigrant Services and Language Affairs (ISLA) prepares and regularly updates division-specific Desk Aids with clear instructions on how to request interpretation and translation services, an explanation of LEP families’ rights to interpretation and translation services and guidance on where/how to make complaints. [See Section 6](#) for additional details.

Vendor Name	Total dollar value of payments during FY23*
Language Line Solution	\$ 199,608.81
Language Line Solution	\$ 869,312.49
Accurate Communication	\$ 173,355.07
Accurate Communication	\$ 1,196,174.99
Accurate Communication	\$ 142,920.74

## Section 4. Notice of the right to language access services

ACS recognizes the importance of outreach and public awareness of language access services, and we will continue to build on ongoing outreach initiatives. Our goal is to ensure that the youth, families, and communities ACS serves are aware of their right to free language services through a variety of information sharing and outreach, including the following:

- The ACS website contains a “Know Your Rights” section about language access information, [ACS - Translated Documents \(nyc.gov\)](#),
- ISLA conducts regular trainings on language access at ACS and our provider agency offices throughout the city with information about how to access the language access services available through ACS contracts, as well as the right for the public ACS works with to have those services provided free of charge.
- ACS posts free interpretation signage at each point of contact with members of the public. We are in the process of updating the posters to the signage developed by the Mayor’s Office of Immigrant Affairs. ACS provider agencies are responsible for posting signage in their offices where they interact with families.
- CPS making initial home visits provide families with written information about their rights when engaging with ACS that is translated into the 10 designated Citywide languages.
- Language access services are part of the ACS’s “Getting to Know ACS” presentations, which are given to community groups and public sector partners across the city to help explain the child welfare, juvenile justice and early child care programs and policies.
- Interpreters are present at community events and meetings to ensure attendees are able to meaningfully participate.
- ISLA regularly meets with community advocates at stakeholder and working group meetings to inform advocates about ACS’s language access services and how to contact ACS if there is a complaint about their clients’ access to language access services. ISLA chairs the “Supporting Immigrant Children and Families Working Group,” which is made up of community child welfare advocates from over a dozen organizations, with whom ACS staff meet twice a year. Language access rights and concerns are regularly discussed in these meetings. This collaborative working group also fosters direct relationships between ISLA and advocates, and advocates know to reach out directly to ISLA on any individual case needs concerning immigration and/or language access or for general questions about ACS language access policies and procedures.
- The ACS website includes a translation “widget” to translate the page into approximately 120 languages, and contains a “Know Your Rights” section informing children and families of their rights to free interpretation services and translation of ACS documents, and includes the email address for the language access mailbox ([language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov)) so that anyone may submit a language access inquiry or complaint.<sup>iv</sup>

## Section 5. Provision of language access services

### A. Interpretation

ACS provides interpretation services through two different vendors: Accurate Communication and Language Line Solutions. Accurate Communication provides ACS with in-person, video-remote (VRI) and Sign Language interpretation. Language Line Solutions provides telephonic interpretation. Between the two vendors, interpretation is available to all ACS and provider agency staff working ACS-involved families 24 hours a day, 7 days a week. Accurate Communication has capacity to provide in-person and video-remote interpretation in over 150 languages. Language Line Solutions has capacity to provide telephonic interpretation in over 240 languages. Requests for interpretation are sent directly from staff to the Vendors.

Upon initial contact, ACS's frontline CPS staff members inform clients of their legal right to free language services and ask for the client's preferred spoken language for verbal communication in order to identify a client's need for language services. A Language Identification Card ("I speak" card) and/or the Language Line Insight phone app are used to facilitate this process. The "I Speak" card is a paper card that explains the right to an interpreter in 12 languages and is available to ACS staff and the public on the ACS website. [ISpeakCards.pdf \(nyc.gov\)](#) Alternatively, staff can use the language list on the Language Line app, on their phones. If it is not possible to determine a client's primary language using the Language Identification Card, telephonic interpretation services are engaged for assistance to determine the language interpretation services are needed.

ACS staff and provider agency staff (which includes Foster Care agencies and Prevention agencies) regularly conduct conferences with families, for which interpretation services are provided to the families through in-person, VRI, or telephonic interpretation. Interpreters are also provided for supervised visitation and for services when they are necessary to complete the service plan.

Interpretation services are provided for all interactions between ACS staff who are not language certified and clients who are LEP or deaf and/or hard of hearing, which includes staff who run the support line for child care enrollment, finance staff who assist foster parents with payment, and the Division of Youth and Family Justice, who utilize interpretation services for youth in detention facilities. ACS's policy is that every effort will be made to use in-person or video-remote interpreters when interactions are expected to last longer than thirty (30) minutes or planned ahead of time. The interactions include but are not limited to:

- Interviews
- Investigations
- Family team conferences (FTCs)
- Other meetings with LEP families
- Community meetings and events

Telephonic interpretation services are used for interactions expected to last less than thirty (30) minutes, or as a back-up interpretation for unexpected meetings or if an in-person or VRI interpreter is not available for the language requested. Those interactions for which telephonic interpretations can be used include:

- Arranging meetings with LEP families
- A call from an LEP individual to ACS staff
- A visit to an ACS office, without an appointment, by an LEP individual(s)

- A rare language is needed, and an interpreter is not available in-person or through VRI

Staff and ACS clients and advocates can send any questions, concerns, or complaints about language access to ACS's language access mailbox: [language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov). In addition, ACS Language Access Contract Management sends surveys to staff who request in-person and video-remote interpretation and follows up with the vendor if there were any concerns.

## B. Translation

ACS ensures that translation services meet the highest quality by working with the Department of Citywide Administrative Services (DCAS) to contract with qualified vendors. ACS has developed a translation style guide and glossary (translated into the 10 designated Citywide languages), to ensure that translations are consistent and accurate. ACS periodically uses a third-party reviewer to test the quality of a translation, and also documents any feedback or complaints about the quality of a translation and submits the document for corrections as needed.

ACS has previously used a consultant to provide plain language trainings to public-facing divisions, thereby building internal capacity to write public facing documents in plain language going forward. The consultant conducted six plain language trainings across ACS's public facing divisions, including the ACS External Affairs division, which has primary responsibility for public-facing communications. The ACS Language Access Policy also specifies that plain language principles should be incorporated in all public facing commonly distributed documents, and supplemental plain language trainings are offered to ACS staff on a regular basis.

ACS contracts with Language Line Solutions (Language Line or LLS) to provide translation services for the agency. ACS has a dedicated Language Access Program Director, Contract Manager, and a Reservist, who are all part of the ACS Office of Immigrant Services and Language Affairs. The Contract Manager liaises with LLS to request that documents are translated, which enables ISLA to identify public-facing documents that may need to be translated into the 10 designated Citywide languages if the request does not already account for them. ACS ISLA provides trainings to leadership in different public-facing divisions on the LL30 requirements to translate commonly distributed public-facing documents into the 10 designated Citywide languages. In addition, ISLA sends an annual reminder to agency leadership on the requirement to translate all commonly distributed public facing documents into the 10 designated Citywide languages.

The ACS Language Access Policy defines "commonly distributed documents" as those ACS documents most often provided to families that contain or elicit important and necessary information regarding the provision of services, i.e., those relating to:

- Program participation (e.g., intake and consent forms);
- Reduction, denial, or termination of services or benefits and the right to appeal such actions;
- Actions and proceedings affecting parental custody (excluding court filings);
- Administrative hearings and/or other investigations;
- The recipient's awareness of rights, requirements, or responsibilities; and
- Time-sensitive or required responses from an LEP individual.

All translations of public documents are sent to the divisions for distribution to clients and are posted on the ACS ISLA internal internet page, to be easily available to staff.

In addition to commonly distributed documents, a large number of ACS's translations are case-specific documents for individual clients, such as conference notes and/or other client documents. Document translations in languages that are not part of the 10 designated Citywide languages, are available upon request by ACS staff in order to meet the needs of the community and families served by ACS.

Translation requests, like any other language access request or inquiry, can be sent directly to our language access mailbox: [language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov).

### **C. Digital communication**

The ACS website includes a translation "widget" to translate the page into approximately 120 languages. The majority of the website uses "unsupervised" machine translation through Google Translate (meaning, there is no human translation proofreading), though ACS is in the process of transitioning to human translation of the website, with human-proofread machine translation updating. Currently, ACS has some pages on its website with this type of supervised translation in six (6) languages: Arabic, Bengali, Chinese, Haitian Creole, Russian, and Spanish.

The ACS website contains a "Know Your Rights" section informing children and families of their rights to free interpretation services and translation of ACS documents and includes links to several public-facing documents that have been translated into the 10 designated Citywide languages. [ACS - Translated Documents \(nyc.gov\)](#). Additionally, the ACS Website includes an Accessibility Statement on ACS' commitment to ensuring that digital content is accessible to and usable by people with disabilities. [ACS - Accessibility Statement \(nyc.gov\)](#)

### **D. Emergency communications**

Considering New York City's ethnic and linguistic diversity, ACS makes every effort to make information available and accessible to all LEP youth and families in a safe and timely manner, regardless of the circumstances. During an emergency, language assistance and the provision of language services are provided by ACS's language access vendors who are available 24/7 for interpretation services. There are 15 ACS locations where an on-site Spanish interpreter are available in the event of an emergency. Depending on the nature of the emergency, some sites may be closed and temporarily relocated. Because ACS has contracts for in-person, video-remote and telephonic interpretation, we have a wide range of language access service media which can be used interchangeably depending on the nature of the emergency. For example, if in-person interpretation is not available or not advisable, as during the current COVID-19 pandemic, ACS and Prevention staff can use video-remote or telephonic interpretation.

ISLA coordinates with the ACS Emergency Management Liaison to ensure that ACS' Continuation of Operation Plan (COOP) provides that during an emergency, language assistance and the provision of language services are provided by ACS' language access vendors under the supervision of the ACS Office of Immigrant Services and Language Affairs (ISLA), providing contact information for the Director of ISLA/Language Access Coordinator. The COOP provides clear details on how to access in-person, VRI, telephonic, and sign language interpretation services

## Section 6. Resource planning

### A. Bi-/multi-lingual staffing

Since the inception of the Language Certification Program in 2021, ACS has currently certified over 200 staff in over 15 languages other than English, so that they may communicate and conduct their work with LEP families in the language in which they are certified without having to use interpretation services. All certified staff take an oral language proficiency exam, proctored through a third-party vendor and certified by the American Council on the Teaching of Foreign Languages (ACTFL). ACS actively recruits all bi-lingual and multi-lingual staff to become certified in a language other than English through targeted emails, agency-wide emails, and through information shared in language access trainings.

ACS collaborated with the respective labor unions for ACS to ensure that fair and equitable practices would apply to all who sought to become language certified. These protections include ensuring the exam is free for staff and taken during your work hours on work-issued devices such as a tablet or laptop. Additionally, ISLA trains ACS staff generally and distributes information to certified staff with the parameters of being certified in another language. Specifically, once certified, ACS staff will have the freedom to speak to their clients in their preferred language without the use of an interpreter, but it is noted that certified ACS staff should not be asked to act as interpreters for their peers, nor may there be any differences in the procedure in how they are assigned caseloads, as the language certification program is not meant to create additional work for staff, or to add responsibilities and duties beyond the scope of their employment description. After being certified, ACS staff receive a certificate that they can upload on the New York City Employee Self-Service Portal (ESS) that is valid for two years, and ISLA also keeps a record of certified staff, as well as a copy of their certification certificate, and the number of certified staff is included in the annual LL73 reports.

For staff who want to further develop their language skills, ISLA may make arrangements for a language or sign language class, through its contract with the vendor Accurate Communications.



## B. Language service vendor contracts

Vendor name	Procurement method	Purpose of the contract	Language(s) provided by the vendor	Period of contract	Total award amount of contract
Accurate Communications	DCAS Task Order	In-Person  Video Remote Interpretation (VRI)	195 languages	10/1/2021-6/30/2025	\$7,489,500.00
Accurate Communications	DCAS Task Order	OnSite  Language Certification Program	Spanish (OnSite)  129 languages for Lang. Cert. Program	10/1/2021-6/30/2025	\$1,548,651.76
Accurate Communications	DCAS Task Order	Sign Language Interpretation		10/1/2021-6/30/2025	\$2,085,000.00
Lanuguage Line Solutions	DCAS Task Order	Telephonic Interpretation	240 languages	6/26/2021-6/30/2025	\$4,075,000.00
Lanuguage Line Solutions	DCAS Task Order	Document Translation	340 languages	9/1/2021-6/30/2025	\$1,040,000.00

## C. Partnership with CBOs

ACS does not have any contracts with any Community-Based Organizations [CBOs] for the sole purpose of providing language access services, however bi- or multi-lingual staff at provider agencies do provide services in linguistically and culturally appropriate settings whenever available. If provider agencies do not have staff with the requisite language fluency, ACS provides language access services to the CBOs it contracts with for Foster care and Prevention services through the ACS language access contracts.

## Section 7. Training

ACS Office of Immigrant Services and Language Affairs (ISLA) works closely with both of ACS's training institutes (the James Satterwhite Academy and the ACS Workforce Institute) to ensure that language access training and understanding is disseminated throughout the agency. The ACS James Satterwhite Academy focuses on establishing the foundations of fundamental practice for newly hired direct service staff and supervisors. The Workforce Institute is a partnership between ACS and the City University of New York (School of Professional Studies and the Hunter College Silberman School of Social Work) to provide ongoing professional skills development for direct service staff and supervisors at ACS and its many partner agencies across the child welfare and juvenile justice sectors.

There are more than 1,000 frontline Child Protective staff who interact regularly with families, children, and members of the public. As part of their onboarding training at the James Satterwhite Academy, these staff members receive training that includes language access, immigration, and cultural sensitivity, conducted by the JSA trainers or by the ISLA team directly. The ISLA team supplements and reinforces these trainings by providing frequent in-person and virtual trainings to ACS staff across divisions and levels. These trainings include the following topics:

- Legal obligations and agency policy on language access
- When and how to use telephonic interpretation
- When and how to use in-person interpretation
- When and how to use video-remote interpretation
- When and how to request translation services
- When to use and not use bilingual staff
- How to become certified in a language to conduct client work without an interpreter
- How to identify the primary language of a person with LEP
- How to track individual's preferred language
- How to track whether and how language services are provided to the individual
- How to provide culturally and linguistically appropriate customer service to LEP individuals
- How to work with an interpreter

Additionally, the ISLA team provides frequent trainings to provider agency staff (including prevention agencies and foster care agencies) on the responsibility to provide language access services and how to access those services. ISLA provides multiple trainings a month to frontline staff in ACS field offices and provider agencies, and tracks which teams have received training recently and which teams might benefit from refreshers. In addition, to build on the initial trainings and increase capacity for training the thousands of frontline staff across ACS and provider agencies, ISLA worked closely with ACS's Workforce Institute to develop a new e-learning course on working with immigrant families, which includes a language access component. The e-learn is available to any ACS or provider agency staff to watch from their computer at any time, thereby greatly increasing the Agency's training capacity.

## Section 8. Continuous improvement planning

### A. Data collection and monitoring

ACS is mandated to use the statewide database CONNECTIONS (CNNX) to track casework data for child welfare services cases. ACS worked closely with OCFS, the state agency which oversees ACS and CNNX, to update the way language data for clients is collected and entered into CNNX. As of result of this advocacy, since 2020 CNNX updated the “Language” field to clarify that it is referring to the person’s “Preferred Language” and added a specific question asking about English proficiency for each individual. Annual data is collected by CNNX on the Primary Language of Individuals Involved in SCR Reports

The Office of Immigrant Services and Language Affairs (ISLA) is the ACS office which is responsible for the contract management for language access services, monitoring the efficacy of the Agency’s Language Access Plan and Policy, ensuring compliance with Local Law 30, and the delivery and quality of our language services, which enables ACS to best meet the needs of our LEP client population. The ISLA team uses data from the language access contracts to drive programmatic decisions on how best to meet the language access needs of our client population. ISLA compares and cross-references information about language as tracked in CNNX with tracking of interpretation service requests and information received from the language access vendors to ensure that language services are being requested in proportion to our understanding of our LEP client language needs. ISLA reports on the data that it tracks and collects in the annual Local Law 73 report.

### B. Language access complaints

The Office of Immigrant Services and Language Affairs (ISLA) tracks and follows up on all complaints received, pursuant to the requirements of Local Law 30. Members of the public are able to submit language access complaints by calling 311, reaching out the ACS Office of Advocacy (by phone, email or walk in), or by emailing the ACS Language Access mailbox ([language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov)), which is listed on the ISLA page of the ACS website ([ACS - Immigrant Services \(nyc.gov\)](https://www.acs.nyc.gov/immigrant-services)). Language access complaints are followed up on by ISLA, which generally reaches out to the relevant programmatic division and/or language access vendor to investigate the complaint and to make efforts to correct the issue. When appropriate, ISLA responds directly to the member of the public who submitted the complaint. ISLA further ensures quality assurance by proactively sending out surveys to all ACS and provider agency staff after their interpretation sessions to track the quality of interpretation sessions. ISLA reports on the complaints that it tracks and collects in the annual Local Law 30 reports.

## Section 9. Goals and actions planning

Language Access Goal	Action Steps/Milestones	Stakeholders	Timeline
Goal 1: Enhance ACS's ability to provide high quality language access services by implementing new language access contracts	Conduct and complete ACS's procurement process for interpretation and translation services and telephonic services through DCAS.	ACS Immigrant Services and Language Affairs  ACS Agency Chief Contracting Officer  NYC Mayor's Office of Contract Services  NYC Department of Citywide Administrative Services	New contracts in effect from 7/1/2025 - 6/30/2028
	Implement new Foreign Language, Sign Language Services and Document Translation contracts, which includes new background check and training requirements related to our work with children, youth and families.	ACS Immigrant Services and Language Affairs  ACS Agency Chief Contracting Officer  NYC Mayor's Office of Contract Services  NYC Department of Citywide Administrative Services	New contracts in effect from 7/1/2025 - 6/30/2028
	Continuously assess our ability to meet the needs of hard of hearing and LEP families and take additional steps as needed to enhance service provision (e.g. this could include new technology, additional resources and/or more trainings)	ACS Immigrant Services and Language Affairs  ACS Office of Information Technology	7/1/2025 - 6/30/2028
Goal 2: Expand existing language access technology to improve language access services for ACS staff and the children, youth and families served by ACS and our providers.	Implement a new Phone system/IVR that will connect callers with an interpreter without having to navigate menus in English	ACS Immigrant Services and Language Affairs  ACS Office of Information Technology	7/31/2025-7/31/2027

	Collaborate with vendor on expanding web site translation Work with Language Line to continue to implement a widget system for supervised web site translation	ACS Immigrant Services and Language Affairs  ACS Office of Marketing  Language Line Solutions (vendor)	6/30/2026
	Consider additional technological advances if they become available	ACS Immigrant Services and Language Affairs  ACS Office of Information Technology	7/1/2025 - 6/30/2028
Goal 3: Enhance access to and knowledge of language access services amongst ACS divisions and providers	Continue efforts to expand language access services to ACS juvenile justice sites, such as secure detention	ACS Immigrant Services and Language Affairs  ACS Department of Youth and Family Justice	7/1/2025 - 6/30/2028
	Continue efforts to train and coach child protection staff, through participating in the new CPS training sessions, meetings with supervisors, etc	ACS Immigrant Services and Language Affairs  ACS Division of Policy, Planning, and Measurement	7/1/2025 - 6/30/2028
	Work across other divisions, such as family court lawyers, finance, the child-care assistance areas, prevention providers and foster care providers, to ensure they know how to access language access services	ACS Immigrant Services and Language Affairs  ACS Family Court Legal Services  ACS Children and Family Well-Being  ACS Division of Prevention Services  ACS Family Permanency Services	7/1/2025 - 6/30/2028
	Consider implementing plain language trainings to improve accessibility of public-facing materials	ACS Immigrant Services and Language Affairs  ACS Division of External Affairs	7/1/2025 - 6/30/2028
	Expand ACS's language access certification program so that more bilingual staff are certified to conduct	ACS Immigrant Services and Language Affairs	7/1/2025 - 6/30/2028

	their work in languages besides English		
	Ensure that signage alerting clients that language access services are available, remain visible at all ACS public-serving sites	ACS Immigrant Services and Language Affairs	7/1/2025 - 6/30/2028

ACS is proud of the extensive language access services we currently offer and will use the next three years to build on and improve those existing services.

---

<sup>i</sup> [abuseneglectreport17to22.pdf \(nyc.gov\)](#)  
<sup>ii</sup> [PowerPoint Presentation \(nyc.gov\)](#)  
<sup>iii</sup> [MOIA\\_ WeLoveImmigrantNYC\\_AR\\_2023\\_final.pdf](#)  
<sup>iv</sup> [ACS - Immigrant Services \(nyc.gov\)](#)