



20
16

**DISTRICT OF COLUMBIA OFFICE OF HUMAN RIGHTS
LANGUAGE ACCESS PROGRAM
ANNUAL COMPLIANCE REVIEW**





Contents

Note from the Language Access Director	3
About the Language Access Program	4
FY16 Projects	14
Methodology, Findings and Recommendations	18
FY16 Agency Compliance Scorecards	26
Compliance Rating Details	66

Note from the Language Access Director

The DC Office of Human Rights is excited to release the “Language Access in the District: FY16 Annual Compliance Report” which provides an overview of the District’s efforts to fulfill the mandate of the DC Language Access Act of 2004 and ensure that Limited and Non-English Proficient (LEP/NEP) residents access the full range of services and opportunities the District offers.

This year’s report contains individual assessments of 38 agencies designated as covered entities with major public contact, and highlights districtwide progress made over the course of FY16 to meet compliance requirements of the Act. Key achievements in FY16 include a highly successful Bilingual Navigator Program piloted at the Department of Motor Vehicles, as a result of which 4,944 LEP/NEP customers were assisted by culturally competent bilingual navigators, the training of over 4,585 District agency employees on language access compliance, and the move by two large agencies to dedicate full time staff to oversee language access implementation within their agencies. FY16 field testing results conducted at 17 agencies with major public contact also revealed improved overall scores for in-person testing, with 92% of in-person testers receiving language assistance in seven different languages. Along with numerous other steps taken by agencies, these achievements continue to position the District as a jurisdiction that innovates and models best practices for effective language access implementation.

This report also offers a comprehensive look at OHR’s Language Access Program and the strategic projects undertaken in FY16 to strengthen agencies’ compliance efforts. The program continued to guide agencies in



developing the systems and practices required to meet the needs of a growing and increasingly diverse LEP/NEP population, assisted 20 covered entities in appointing a Language Access Point of Contact to lay the groundwork for compliance reporting in FY17, and worked with 38 major public contact agencies in developing comprehensive plans with prioritized compliance goals to be pursued over the FY17/18 period.

I would like to express tremendous gratitude for our dedicated community of Language Access Coordinators and Points of Contact, the Mayor’s Constituency Offices, the DC Language Access Coalition, and community partners who prioritize language access every day to ensure that our agencies remain fully accessible to all individuals. As we enter a new year, I am even more committed to continue working with our partners to build agencies’ capacity for greater engagement and inclusion of LEP/NEP populations in the District.

“Effectively reaching and serving linguistically diverse communities requires intentional policies, structures, and practices. Covered entities continue to make steady strides towards these goals to ensure that all District residents receive equal access to government programs and services.”

-Winta Teferi, Language Access Director

About the Language Access Program

OHR's Language Access Program (LAP) team is comprised of the Language Access Program Director, and the Program Analyst. The program works closely with agency-based Language Access Coordinators and Language Access Points of Contacts who are designated to assist their agencies in implementing the requirements of the Language Access Act.



Photo Above: Language Access Coordinators representing agencies with major public contact, Language Access Liaisons representing the Mayor's Offices on African, Asian & Pacific Islander, and Latino Affairs, and the Language Access Program team.

Winta Teferi | Director

With over 12 years of combined experience in organization development consulting, program management and multicultural community building, Winta has worked in both government and nonprofit arenas on issues of access, inclusion and civic engagement. Before joining OHR, Winta worked as a Program Analyst for the Mayor's Office on African Affairs and as the Program Director at IMPACT Silver Spring. She holds an M.A. in Organization Development from American University and a B.A. in Economics from the University of Maryland. She is fluent in Amharic and French, and is committed to strengthening District agencies as they adapt and innovate to serve increasingly diverse communities.

Priscilla Mendizábal | Analyst

Priscilla is bilingual in English and Spanish and earned an M.A. in Human Services from Lincoln University. She is a DC native with 17 years of experience as a public servant, including 7 years with the District of Columbia's Department of Employment Services. Priscilla also has 10 years of experience in the non-profit sector working on the frontline with the Latin American Youth Center and the Columbia Heights/Shaw Family Support Collaborative to help youth and families access services and attain self-sufficiency. She brings extensive community engagement experience, as well as strong skills in case management and compliance monitoring. She has strong inter-personal, administrative and customer service skills.

The DC Language Access Act of 2004 requires all District government agencies, contractors and grantees ensure that Limited and Non-English Proficient residents have full access to services and receive translation and interpretation services. The LAP provides support and accountability to ensure that District agencies, contractors and grantees meet their obligation under the Language Access Act of 2004 by serving all District residents and visitors regardless of the language they speak. The work of the program is organized in four areas:

Compliance Monitoring

The LAP fulfills this function by ensuring that each major public contact agency identifies an attainable two-year plan that guides agency specific compliance with the Act and reviewing the agency's progress on a quarterly basis. 38 major public contact agencies currently have biennial plans and are required to provide quarterly progress reports to OHR. All covered entities are required to report total encounters with LEP/NEP customers, and all language services provided by the agency over the course of the fiscal year to the LAP on an annual basis.

Enforcement

Individuals who believe their rights have been violated under the law may file a language access complaint with OHR. Once docketed cases are investigated, the OHR Director, in consultation with the LA Director, issues written findings and works with agencies found in non-compliance to identify and monitor systemic corrective actions.

Technical Assistance

The LAP serves as the citywide point of contact for covered entities on all language access-related issues. The team responds to daily inquiries from Language Access Coordinators, Points of Contact and District employees who seek guidance on Language Access implementation; routinely trains covered entities' staff on compliance requirements and cultural competency; and provides targeted technical assistance to major public contact entities by working with their Language Access Coordinators and Teams via quarterly meetings and individualized consultations.

Community Engagement

The LAP team works closely with OHR's Policy and Communications team on outreach and education initiatives, and partners with the Mayor's Offices on African, Asian and Pacific Islander, and Latino Affairs, the DC Language Access Coalition, and community-based organizations, to ensure LEP/NEP communities are aware of their rights under the law.

By the Numbers:

Profile of the
District's LEP/NEP
residents

15%

or 91,588 of residents over age
of 5 are foreign-born

17%

or 103,316 of residents over
the age of 5 speak a language
other than English at home

5%

32,636 of residents under
the age of 5 are limited or
non-English proficient

Compliance Monitoring

The Language Access Act of 2004 requires covered entities - all District government agencies, programs, contractors, and vendors - to provide language services to constituents who are limited or non-English proficient (LEP/NEP). The Act further outlines different requirements for these covered entities depending on how much direct contact they have with the public. It is the task of the Language Access Program to monitor all covered entities, including those with major public contact, and conduct an annual assessment of their level of compliance with their responsibilities under the law.

Key Compliance Requirements

COVERED ENTITIES MUST:

- Identify a **Language Access Point of Contact**
- Collect and analyze data on the demand for agency services in languages other than English
- Offer interpretation services
- Provide written translations of vital documents into non-English languages that meet the agency's language threshold (3% of the agency's constituents or 500 individuals, whichever is less)
- Train staff on language access compliance
- Submit a **yearly implementation report** on the data collected and resulting analysis to OHR.

COVERED ENTITIES WITH MAJOR PUBLIC CONTACT MUST:

- Identify a **Language Access Coordinator**
- Collect and analyze data on the demand for agency services in languages other than English
- Offer interpretation services
- Provide written translations of vital documents into non-English languages that meet the language threshold (3% of the agency's constituents or 500 individuals, whichever is less)
- Train staff on language access compliance
- Establish and implement a **Biennial Language Access Plan**, and report the plan's progress on a quarterly basis to OHR; and
- **Conduct outreach** to LEP/NEP communities.

At the end of FY16, the Language Access Program conducted compliance assessments for each covered entity with major public contact based on the quarterly updates and annual reports they submitted. For 17 out of the 38 agencies, their scores included results from field tests conducted at the agency in-person or over the phone between May and August, 2016. Individual agency assessments take the form of scorecards that feature a numeric rating as well as a description of the agency's strengths and areas of improvement. This report features 38 scorecards (to avoid bias, OHR does not score itself).

Compliance Scorecards

View agency compliance scorecards beginning on page 26.



Covered entities with major public contact:

1. Alcoholic Beverage Regulation Administration
2. Child and Family Services Agency
3. Department of Behavioral Health
4. Department of Consumer and Regulatory Affairs
5. Department of Corrections
6. Department of Employment Services
7. Department of Energy & Environment
8. Department of General Services
9. Department of Health
10. Department of Health Care Finance
11. Department of Housing and Community Development
12. Department of Human Resources
13. Department of Human Services
14. Department of Motor Vehicles
15. Department of Parks and Recreation
16. Department of Public Works
17. Department of Small and Local Business Development
18. Department of Youth Rehabilitation Services
19. Department on Disability Services
20. District Department of Transportation
21. District of Columbia Housing Authority
22. DC Lottery and Charitable Games Control Board
23. District of Columbia Office of Zoning
24. District of Columbia Public Library
25. District of Columbia Public Schools
26. Fire and Emergency Medical Services Department
27. Homeland Security and Emergency Management Agency
28. Metropolitan Police Department
29. Office of Administrative Hearings
30. Office of the Attorney General – Child Support Services Division
31. Office of Contracting and Procurement
32. Office of Human Rights
33. Office of Planning
34. Office of Tax and Revenue
35. Office of the People's Counsel
36. Office of the State Superintendent of Education
37. Office of the Tenant Advocate
38. Office of Unified Communications
39. Office on Aging

New reporting requirements for covered entities:

Sections §1205.17 and § 1204.7 of the Language Access Act regulations requires covered entities to appoint a Language Access Point of Contact (LAPOC) and report on encounters with LEP/NEP customers and on implementation activities within the agency. In FY16, OHR worked with **20 covered entities that successfully designated a LAPOC** and began assessing their agencies' readiness to serve LEP/NEP customers. These agencies will provide compliance reports for the first time in FY17.

- Board of Elections
- Commission on the Arts and Humanities
- Department of Forensic Sciences
- Department of For-Hire Vehicles
- Department of Insurance, Securities and Banking
- District of Columbia Corrections Information Council
- District of Columbia Developmental Disabilities Council
- District of Columbia Retirement Board
- Health Benefit Exchange Authority
- Office of Cable Television, Film, Music and Entertainment
- Office of Disability Rights
- Office of Employee Appeals
- Office of Inspector General
- Office of Police Complaints
- Office of the Attorney General
- Office of the Chief Financial Officer
- Office of the Chief Medical Examiner
- Office of the Chief Technology Officer
- Office of Victim Services and Justice Grants
- Public Services Commission
- State Board of Education

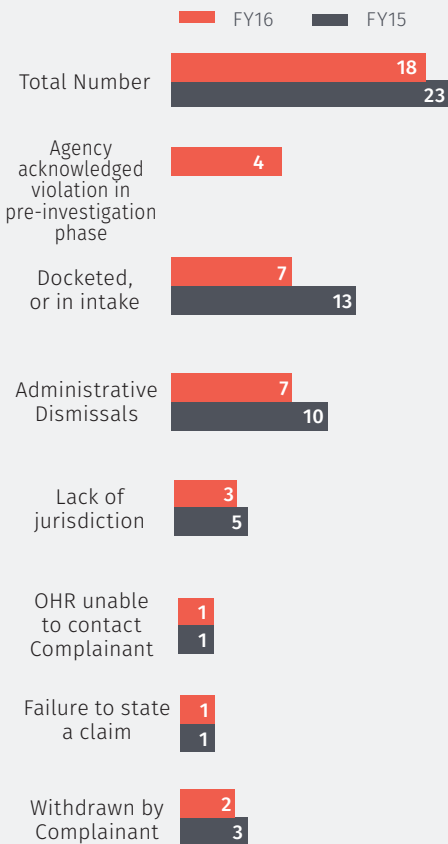
Enforcement

Section §1202.4 of the Language Access Act regulations requires that OHR report annually the total number of language access public complaints received and/or investigated.

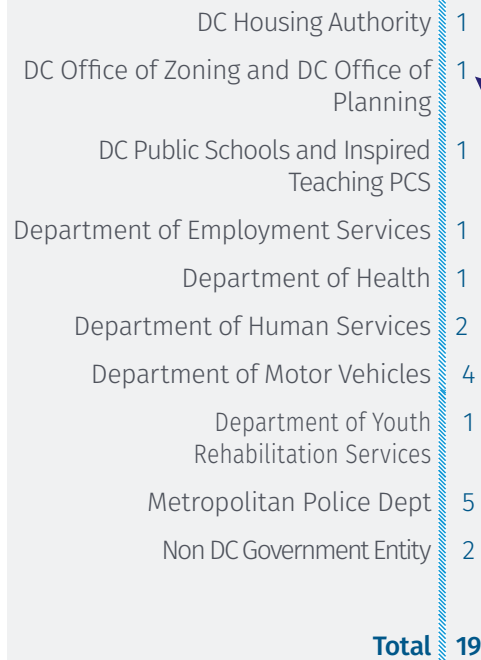
OHR received a total of **18 complaints** alleging violation of the Language Access Act in FY16. Out of the 18 complaints received in FY16, **4 were resolved during the pre-investigation*** process with non-compliance findings based on agencies' acknowledgement of the violations as alleged by Complainant. Of the remaining 14, **7 were assigned for full investigation** following a pre-investigation resolution process, and **7 were either withdrawn by complainant or administratively dismissed** based on lack of jurisdiction, failure to state a claim, or lack of response from complainant. OHR issued a total of 6 determinations in FY16, 5 of which contained non-compliance findings. Agencies found in violation of the Language Access Act in FY16 include the Department of Motor Vehicles, the Metropolitan Police Department, and the Department of Health.

**Per FY14 changes to Language Access Act regulations, the LA Director provided a pre-investigation resolution step for all complaints received in FY16 to ensure that complainants who require immediate assistance from an agency are able to request it within a 45-day window before the case is assigned for investigation. The pre-investigation step also gave agencies an opportunity to resolve a complaint outside of the investigation process by either acknowledging violation as alleged by complainant, or by satisfying terms of resolution as defined by the complainant and OHR.*

In Comparison: FY 15-16 Complaints Filed



FY16 Complaints by Agency

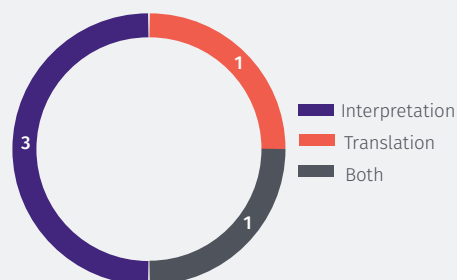


Determinations

OHR issued 5 determinations of non-compliance in FY16 against the following agencies:

Department of Health: 1
 Department of Motor Vehicles: 2
 Metropolitan Police Department: 2

Reason for Non-Compliance findings:



Agencies were found in non-compliance for failure to translate documents, provide interpretation, or both.

FY16 Cases Under Investigation

Department of Employment Services: 1
 Department of Human Services: 2
 Department of Motor Vehicles: 1
 Metropolitan Police Department: 3
Total: 7

Technical Assistance

The LAP focused FY16 technical assistance efforts on assisting agencies with the development and adoption of a Biennial Language Access Plan (BLAP) for the FY17/18 compliance period, and on ensuring that Language Access Coordinators and Points of Contact were provided with training and reference tools needed to comply with electronic planning and reporting requirements. The program also delivered numerous language access compliance trainings directly to agency employees and offered two train-the-trainer sessions to equip agencies with resources and content expertise needed to deliver trainings in-house. The program team made concerted efforts to widely promote the Language Access Information Portal which features a wide array of resources and reference guides to facilitate language access implementation across covered entities.

FY17/18 Biennial Language Access Plans

The LAP dedicated a good part of FY16 to assisting covered entities with major public contact in drafting and finalizing each agency's Biennial Language Access Plan (BLAP). The BLAP is a legally mandated 2-year plan that serves as a roadmap guiding agencies' efforts toward full compliance with the Act. FY17/18 BLAPs were first internally developed within the agencies, and then evaluated by OHR and consultative partners before being finalized and approved with clear action plans and deadlines. The process for developing FY17/18 BLAP in FY16 entailed the following:

- Draft BLAP submission by agencies with major public contact
- First round of OHR feedback to agencies
- Revised BLAP submission for second round of review by OHR
- Final review by Mayor's Offices on African, Asian & Pacific Islander and Latino Affairs and the DC Language Access Coalition
- Final approval by OHR and Agency Director



photos above: Language Access Coordinators at a bi-monthly meeting with OHR

Language Access Compliance Database

The LAP is extremely pleased with the full digitization of compliance monitoring for covered entities and the successful transitioning of all reporting, planning, and communication to a quickbase-supported compliance database. Language Access Coordinators received frequent training and manuals on use of the tool and successfully utilized it for FY16 reporting and developing their agencies’ FY 17/18 Biennial Language Access Plans. The transition from paper to digital reporting has allowed agencies to better assess systems and tools available to facilitate provision of language access, track interactions with LEP/NEP populations and emerging language needs, easily identify vital documents to be prioritized for translation, and maintain focus on action plans and deadlines to execute their 2-year plan. This digitization effort is even more invaluable to the LAP as it centralizes compliance details, allowing for a deep and comprehensive look at an agency’s standing while also providing the opportunity to track districtwide progress on specific compliance areas. In FY17, the LAP looks forward to bringing Language Access Points of Contact into the fold and providing them with training and support as they transition to using the database for FY17 reports.

Language Access Compliance Training

OHR conducted a total of 42 language access compliance and cultural competency trainings in FY16 that were directly delivered to 708 District employees. In an effort to decentralize language access training and facilitate 100% compliance with training requirements of the Act, OHR developed a Language Access Training Guide and offered two train-the-trainer opportunities for Language Access Coordinators and Training and Professional Development units of major public contact agencies. This enabled agencies to offer both standardized and personalized in-house compliance trainings and collectively reach 4585 District employees in FY16.

In-house agency staff-led trainings	98
In-person trainings	88
Online trainings	10
Trainings/workshops led by OHR	42
Agency specific training	33
DCHR Center of Learning and Development	9
Total number of compliance trainings delivered in FY 16	141

4585

DISTRICT EMPLOYEES RECEIVED
LANGUAGE ACCESS COMPLIANCE
TRAINING IN FY16

Agency Training Highlight

Child and Family Services Agency (CFSA) is one of many major public contact agencies who have successfully developed a robust language access training program for its employees and contractors. In FY16, CFSA reported that it was able to train 558 staff including frontline staff, social workers, social services assistants, hotline responders, administrative staff, and contractors. CFSA stated that “these training allowed for direct interactions and immediate identification of CFSA-specific issues employees encounter when serving the LEP/NEP customers.”

Community Engagement

OHR conducts extensive outreach to LEP/NEP communities to ensure that they are aware of and exercise their right to language access services. Together with community-based partners, OHR engaged over 800 LEP/NEP District residents in FY16 through “Know Your Rights” trainings and distributed hundreds of multilingual “I Speak” and “Know Your Rights” cards at 125 community events. The program also engages organizations that serve LEP/NEP customers to encourage service providers, known as Human Rights Liaisons, to promote language access rights to their customers and report potential violations to OHR. In FY16, OHR trained over 85 Human Rights Liaisons and delivered 114 “Know Your Rights” trainings across the District.



photos above: OHR staff conducting outreach at community events.

85

HUMAN RIGHTS LIAISONS

from various DC-based organizations were trained to recognize and report civil rights and language access violations their customers encounter to OHR.

800

LEP/NEP RESIDENTS

were engaged through “Know Your Rights” trainings and community events informing them of their right to language access services in the District.

114

TRAININGS

were conducted to constituents, advocates, case managers and legal service providers that included information about language access protections that impact their clients and members.

125

COMMUNITY EVENTS AND MEETINGS

featured information on language access including multilingual “Know Your Rights” and “I Speak” cards for LEP/NEP individuals.

FY16 Language Access Testing

The Equal Rights Center (ERC) conducted a total of 237 language access field tests on behalf of OHR in FY16. Field tests consisted of 130 telephone calls and 107 in-person visits to the public-facing divisions of 17 agencies. ERC testers attempted to obtain information from frontline employees while speaking exclusively in one of seven non-English languages: Amharic, Arabic, Chinese, French, Korean, Spanish, and Vietnamese. The ERC tabulated the results of those testing encounters and the LA team incorporated the test results into the agency compliance score cards under the 'Quality' component. The LAP plans to use these results to guide training and technical assistance projects in FY17.

Summary of Findings:

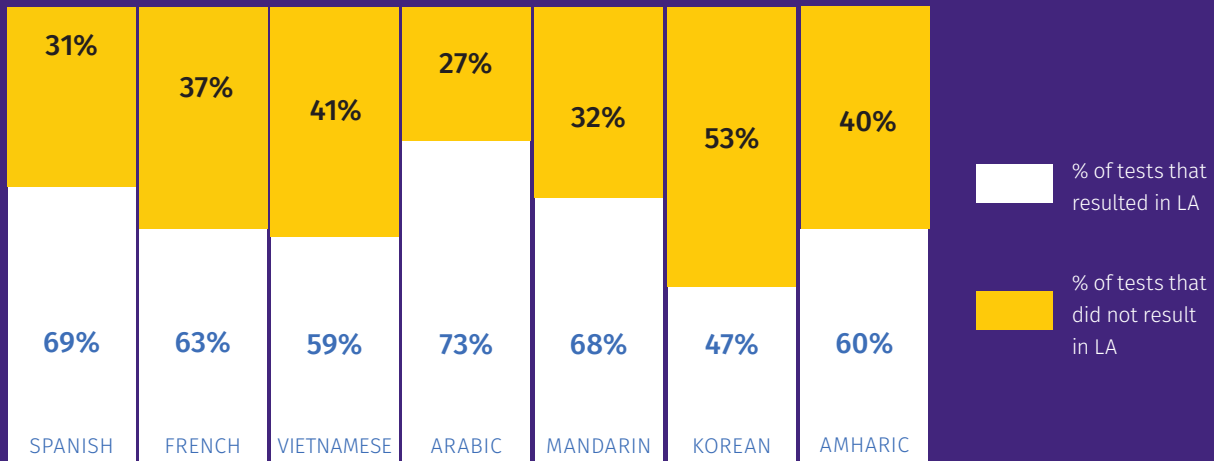
These findings provide a glimpse of the experiences had by LEP/NEP customers at 17 critical agencies across District government. A total of 237 tests were conducted in multiple languages from May to August 2016.

- Testers received language assistance in **43%** (45% in FY15) of the telephone tests and **92%** (88% in FY15) of the in-person tests.
- Testers received no language assistance in **57%** (55% in FY15) of the telephone tests and **8%** (12% in FY15) of the in-person tests.
- Testers received language assistance through a telephonic interpreter in **52%** (47% in FY15) of tests.
- Testers received language assistance from bilingual employees in **10%** (14% in FY15) of tests. Bilingual employees provided assistance in Spanish, French, and Amharic.

Agencies Tested in FY16

Child and Family Services Agency, DC Housing Authority, DC Public Schools, Department of Behavioral Health, Department of Consumer and Regulatory Affairs, Department of Employment Services, Department of Health (Providers), Department of Housing and Community Development, Department of Human Services, Department of Motor Vehicles, Department of Parks and Recreation, Department of Public Works, Department on Disability Services, Metropolitan Police Department, DC Office of the State Superintendent for Education, Office of the Tenant Advocate, and Office of Unified Communications.

Test Outcomes by Language



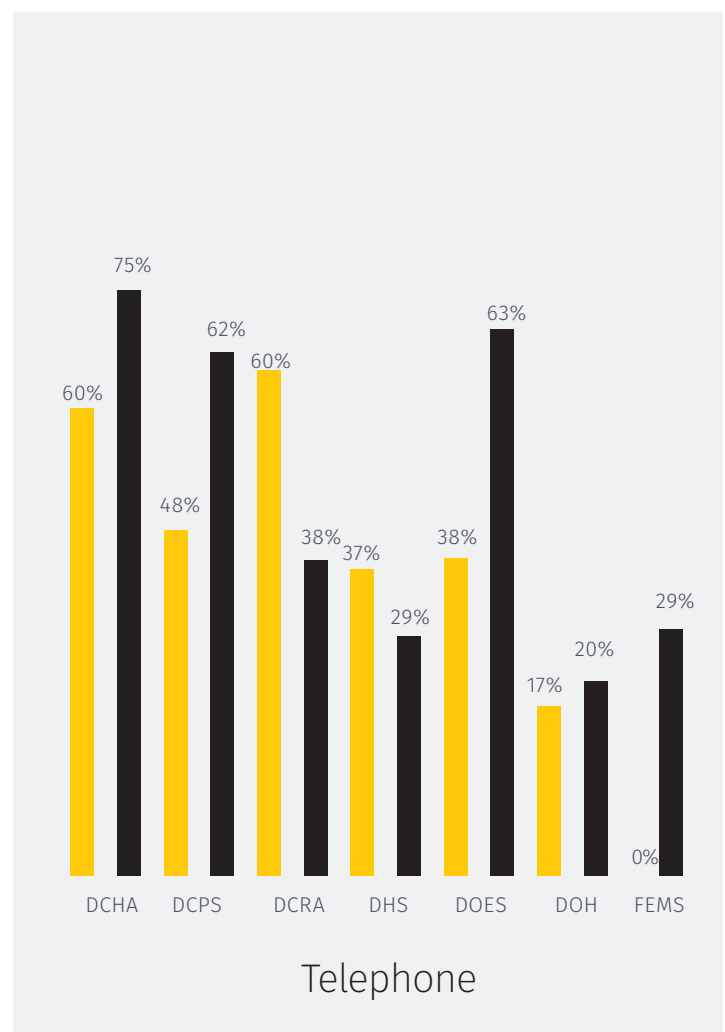
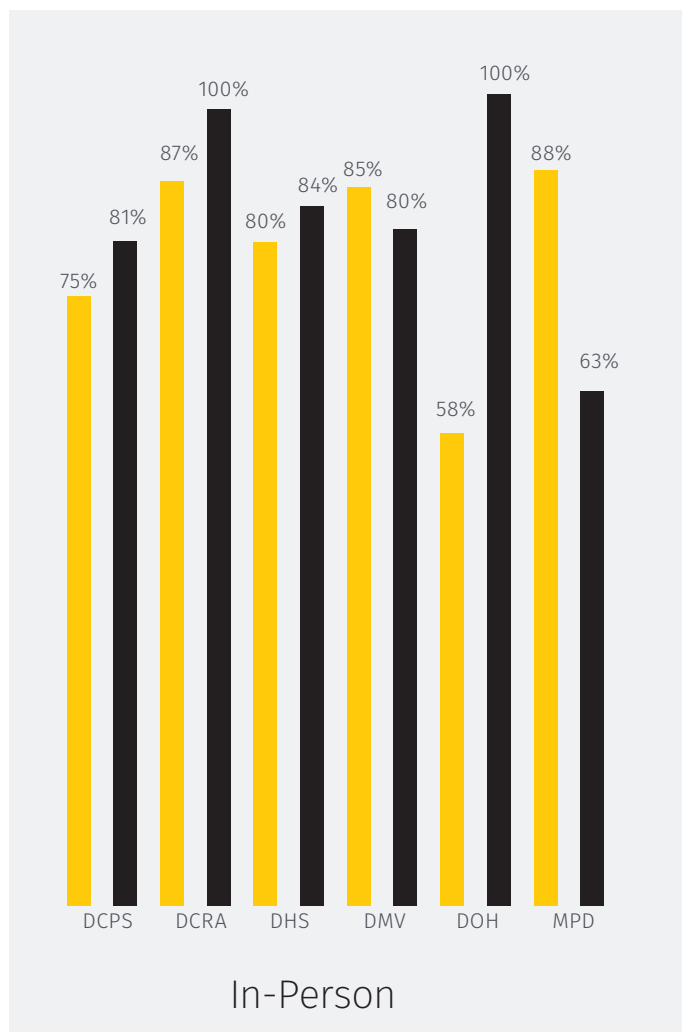
Success Rates:

In-Person and Phone Test

Percentages of the tests below that resulted in requested services, information or resources.

FY16

FY15



Bilingual Navigator Program

The Bilingual Navigator Program trained and placed four Spanish-speaking bilingual navigators at Department of Motor Vehicles (DMV) service centers to greet and assist LEP/NEP customers as they entered the DMV seeking services. . During the 6-month pilot phase between August 2016 and January 2017, navigators assisted 4,944 LEP/NEP customers and worked with DMV to ensure they received the appropriate language assistance they needed to successfully navigate the DMV credentialing process.

In anticipation of the large volume of mostly Spanish-speaking LEP/NEP Limited Purpose License applicants expected to walk into DMV service centers following the elimination of the appointment system, OHR partnered with the DMV to recruit, train, and place navigators who could provide culturally and linguistically competent support to customers and assist DMV staff in meeting greater demand for language assistance.

How the program worked – Navigators:

- Were stationed at the information desk kiosk inside each service center to receive customers at the first point of contact
- Identified customers requiring language assistance and used multilingual signs to find out the customer's language
- Identified the appropriate type of language assistance needed (bilingual staff, language line, translated documents)
- Facilitated use of language line or translated documents by DMV frontline staff and ensured that optimal language assistance was provide
- Assisted Spanish-speaking customers directly, reviewed their documents, and guided them through the required credentialing steps; and
- Informed customers of their right to language assistance.

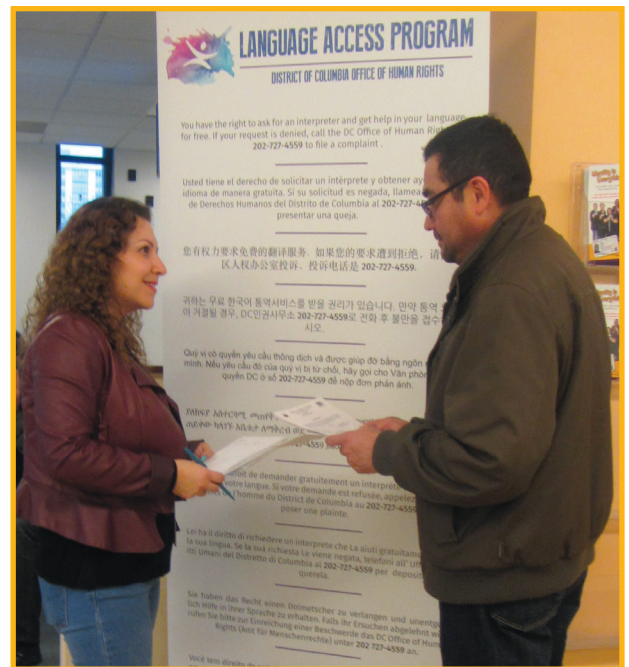


photo above: Bilingual navigator assisting LEP/NEP customer at a DMV Service Center

Highlights from an OHR survey administered to 141 LEP/NEP DMV customers who provided feedback on their experience being assisted by Navigators:

Types of Services Sought by LEP/NEP Customers:

- Limited Purpose Driver License
- REAL ID Driver License
- Limited Purpose ID
- REAL ID
- Limited Purpose Learners Permit
- REAL ID Learners Permit
- License Renewal
- Vehicle Title
- Vehicle Registration
- Temporary Registration and Tags
- Change of Address

The Bilingual Navigator Program has received positive feedback from DMV center staff, navigators and LEP/NEP customers alike:

"This was an extremely effective program, customers were so relieved when they discovered I spoke Spanish and were grateful to have someone patiently answer all their questions and help them navigate through the process in their own language."

- Bilingual Navigator

"The navigator caught on quickly and we were able to break down barriers for our Latino customers whom we have trouble communicating with."

- DMV Staff

139 out of 141
survey responders indicated that they **received the service** that they were seeking at the DMV.

136 out of 141
survey responders indicated that they would like to see **permanent bilingual navigators** placed at the DMV.

"I am thankful for the support I received from the navigator because I was able to understand what paperwork was necessary for me to complete my transaction. It is a great feeling to have someone communicate with me in my own language and who is helpful, respectful, and knew the paperwork requirements."

- LEP/NEP customer

Rating Methodology

This report features compliance scorecards for **38 District agencies with major public contact**. The compliance scorecards provide an overview of how accessible a covered entity with major public contact is to constituents who are limited and non-English proficient (LEP/NEP) and feature a narrative, numeric evaluation, and a description of each agency's areas of improvement, gaps in compliance, and recommended priorities for FY17. The numeric evaluation provides an agency's overall compliance score based on its performance in **three categories: preparedness, accessibility, and quality**. The category of preparedness captures whether an agency has laid the groundwork for interacting with LEP/NEP constituents, such as by collecting data on encounters and training frontline staff on language access requirements. The category of accessibility measures the current state of language access services at a given agency, including interpretation, translation, website accessibility, and outreach. The category of quality reflects how well an agency is implementing its services with respect to customer experiences. It incorporates the outcomes of the field testing that OHR commissioned, as well as any formal complaints. To receive a perfect compliance score, an agency must fulfill all of the requirements under each of these three categories. Each requirement corresponds to one point, allowing for a maximum possible score of 14 for agencies that underwent field testing and 12 for agencies that did not. Individual agency score per requirement is available in the compliance details table on page 26.

Preparedness	P1: Agency provided data on FY16 encounters.	Did the agency record its encounters with LEP/NEP constituents and report them to OHR? Do records include the languages and number of speakers encountered?
	P2: Method for collecting data was comprehensive.	Is the agency using more than one method to collect data? Will the methods yield accurate data? Did agency implement OHR recommendations or BLAP action items related to data collection?
	P3: Agency staff were trained in FY16.	Did the agency train staff on language access requirements and resources? How many people were trained, and who provided the training? Did agency implement OHR recommendations and/or BLAP action items related to staff training?
	P4: Agency communicated effectively.	Did the agency send a representative to the bimonthly LA Coordinators meetings hosted by OHR? Did the agency participate in special trainings on electronic reporting? Was the agency responsive to OHR inquiries? Did the agency proactively reach out to OHR?

Accessibility

A5: Direct requests for interpretation and/or translation services were met.

Did the agency provide translation and interpretation to constituents who asked for these services?
Is there evidence that the agency provides language assistance as part of its routine service delivery process?

A6: Vital documents were translated and/or updated in FY16.

What documents did the agency translate in FY16?
Are agency's vital documents translated in other languages?
Did agency implement OHR recommendations or FY15/16 BLAP action items related to document translation?

A7: Translated vital documents are accessible on agency website.

Does the agency have any web pages in languages other than English?
Are the agency's vital documents available in other languages?
Did agency implement OHR recommendations or FY15/16 BLAP action items related to the online accessibility of translated documents?

A8: Vital documents translated in FY16 reflect the needs of LEP/NEP customers.

Are the agency's vital document translations appropriate to the LEP/NEP population(s) it encountered?
Has the agency translated documents into languages besides Spanish that meet the agency's threshold?
Did the agency implement OHR recommendations or FY15/16 BLAP action items related to the translation of documents into specific languages?

A9: Efforts were made to reach out to LEP/NEP communities in FY16.

Did the agency conduct any outreach that specifically targeted LEP/NEP communities?
Did the agency's outreach initiatives bring the agency into meaningful contact with LEP/NEP constituents?
Did the agency implement OHR recommendations or FY15/16 BLAP action items related to outreach to LEP/NEP communities?

Q10: No complaints were filed against the agency in FY16.

Has the agency received multiple complaints regarding the same issue?
Did OHR identify problems last year, are those problems still present?
Is the agency showing persistent gaps that remain unaddressed?

Q11: Agency was not found in non-compliance in FY16.

Were any complaints filed against the agency?
Did any complaints result in a non-compliance finding?

Quality

Q12: No tester was turned away during tests.

ONLY FOR AGENCIES THAT UNDERWENT FIELD TESTING
Did all testers receive interpretation and, when appropriate, translation services?
If not, were there any mitigating circumstances?

Q13: All testers who accessed interpretation received requested information or services.

ONLY FOR AGENCIES THAT UNDERWENT FIELD TESTING
When testers did receive language assistance, were they able to obtain the information or resources that they requested?
Were they able to communicate effectively through the services offered?

Q14: OHR has observed significant improvement in LA implementation in FY16.

Has the agency taken steps to provide or sustain full access to LEP/NEP customers?
Has the agency addressed some, if not all, systemic issues to close gaps in compliance and improve its service to LEP/NEP customers?
Looking at FY16 testing outcomes and public complaints (where applicable), agency self-reported updates, OHR observations, and stakeholder feedback, is the agency on track with LA implementation?

Summary of Findings

PREPAREDNESS

300

employees were trained
on language access at
**locally-funded public service
organizations.**

QUALITY

43%

of the **telephone field tests**
conducted at 14 agencies
provided adequate
language assistance,
which is a decrease
of 2% from FY15.

ACCESSIBILITY

27

agencies reported
conducting **outreach** to LEP/
NEP communities with a
total of 632 outreach events
over the course of FY16.

QUALITY

92%

of the in-person field tests
conducted at 9 agencies
**provided adequate
language assistance** – an
increase of 3% from FY15.

ACCESSIBILITY

89

different languages were
requested by customers
and provided by
agencies.

PREPAREDNESS

32

language access policies have
been adopted by covered
entities with major public
contact.

By the Numbers:

Implementation of Act Requirements

228,997

LEP/NEP encounters reported by 38 major public contact agencies

74,278

agency calls to provide telephonic interpretation in 89 languages

25,937

in-person agency interpretations provided

Based on Language Line usage, the top 10 languages served were:

58,729	6,058	1,571	1,412	1,070	388	381	370	336	116
Spanish	Amharic	Mandarin	French	Vietnamese	Cantonese	Arabic	Tigrinya	Bengali	Haitian/Creole

Based on agency encounters, the top 10 languages served were:

136,479	14,247	4,290	4,193	1,944	1,638	1,265	1,013	712	677
Spanish	Amharic	Chinese	French	Russian	Vietnamese	Mandarin	Arabic	Korean	Japanese

4,585

agency staff members trained on language access, with 708 trained by OHR

592

vital documents translated by agencies

21%

fewer language access complaints received by OHR than in FY15.

26

agencies translated vital documents into at least one language

FY16 Progress Update and FY17 Recommendations

Below are updates on recommendations presented in OHR's FY15 Language Access report for District-wide improvement in language access compliance over the FY15/16 BLAP period:

Improving accessibility of services to LEP/NEP customers, especially over the phone, through recurring training, effective signage, comprehensive language access policy, and hiring of bilingual staff

STATUS UPDATES:

- Covered entities are, now more than ever, successfully providing language access to LEP/NEP customers in-person, yet continue to struggle with providing the same level of access over the phone. Field tests conducted at 9 agencies in FY16 indicated that language assistance was provided in 92% of the in-person tests, showing a 3% increase from FY15 results. On the other hand, only 43% of FY16 telephone tests resulted in customers receiving language assistance, showing a 2% decrease from FY15 scores.
- Covered entities with major public contact made over 74,278 calls to access a telephonic interpreter through Language Line Solutions. This is a slight decrease compared to 80,563 calls made in FY15, but an increase compared to 71,139 calls made in FY14.
- 4,585 employees and contractors were trained in language access compliance requirements. This shows a remarkable 19% increase from the 3,858 employees trained in FY15 and a 52% increase from 3,017 trained in FY14.
- 578 bilingual staff are reported to be in key public-facing positions where added cultural and linguistic skills stand to build agencies' capacity to serve LEP/NEP customers.
- 32 agencies currently have language access policies that outline internal processes and guidelines for providing access to LEP/NEP customers.

PLANNING AHEAD:

As field tests revealed in FY15, FY16 results once again indicate that agencies remain inaccessible to LEP/NEP customers over the phone, and that approximately one third of the telephone testers were hung up on by agency staff. While greater compliance with training requirements and broad adoption of internal language access policies undoubtedly enhanced agencies' preparedness to serve LEP/NEP customers, OHR once again urges covered entities to address barriers to telephone access by conducting internal audits of their call centers and frontline staff designated to take calls from the public. Agencies need to also take stock of the tools at their employees' disposal to ensure that the appropriate resources needed for handling calls from LEP/NEP callers are all prominently displayed at their work stations. Ensuring that, for example, a reference guide with the language line number and agency code, step by step instructions on accessing a telephonic interpreter, and tips on how to handle callers whose languages they are unable to identify, could help support employees who may feel unprepared to handle callers who do not speak English. Finally, continuous training, refresher exercises, role-plays, and official agency-wide reminders outlining disciplinary action for non-compliance are also needed to consistently uphold the agencies' commitment to providing language access in every single interaction with an LEP/NEP customer.

Improving quality of data collected on LEP/NEP encounters through increased authority and support for Language Access Coordinators, improved internal reporting systems, and rigorous training for grantees and contractors.



STATUS UPDATES:

- Covered entities with major public contact collectively reported a total of 228,997 encounters with LEP/NEP customers in FY16 in which language assistance was provided through a bilingual staff, an in-person interpreter, a video interpreter, or a telephonic interpreter. This shows a 12% increase compared to 204,783 encounters reported in FY15, and a 50% increase compared to 152,732 encounters reported in FY14.
- Although reported encounters from 5 agencies newly designated as covered entities with major public contact account for some of this increase, improved data collection mechanisms across agencies and consistent reporting through quickbase have also contributed to this outcome.
- 2 agencies (OSSE and MPD) have designated full time staff to serve as Language Access Coordinators who work exclusively on advancing their agency's language access goals. Ensuring that Language Access Coordinators have the capacity, authority, and resources to follow through on agency's compliance goals produces tangible improvements in the quality of services provided to LEP/NEP customers.
- Almost all 38 Language Access Coordinators have successfully transitioned to electronic reporting and increased their comfort level in using the Quickbase-supported language access compliance database.

PLANNING AHEAD:

Covered entities with major public contact have shown real progress in FY16 in fulfilling data collection requirements. With more comprehensive data on the language needs of their customers, they can make informed resource allocation choices, effectively prioritize document translation, set intentional plans for outreach, and target specific languages in their recruitment of bilingual staff. It is OHR's position that agencies that have not yet fulfilled this fundamental requirement must immediately: a) undertake a thorough audit to identify all public-facing functions within the agency; b) develop the requisite tools needed for recording language needs of customers; c) identify the most efficient process for centralizing data collected by employees, and once a process is formalized in the agency's language access policy, d) train all front-line staff on data collection and reporting procedures.

Improving accessibility through translation of vital documents, well-organized translated materials on agency's website, and use of multilingual taglines

ACTION TAKEN:

- In FY16, 26 agencies reported producing at least one translated vital document (compared to 23 in FY15), and many provided at least some of their translated vital documents online.
- 12 agencies translated vital documents into at least 4 different languages in FY16, and half of these translated vital documents into 6 languages.
- 32 out of 38 major public contact agencies provide a "language support" section on the homepage of their website which features a description of the agency's core services and programs in 6 languages (Spanish, Amharic, Chinese, Vietnamese, French and Korean).
- Except for 2 agencies, all other major public contact agencies embedded translated vital documents into various programmatic sections of the website.

PLANNING AHEAD:

With improved tracking and reporting of encounters observed in FY16, OHR hopes that agencies will be in a better position to understand the language needs of their customers and prioritize translation efforts accordingly. Ensuring that all vital documents are reaching the intended audience remains an important area of improvement for most agencies. Creating a "language support" section on the agency's website and organizing translated documents by language is an easily achievable goal that will greatly facilitate access for LEP/NEP customers seeking information online. Including simple multilingual tag lines to vital documents instructing LEP/NEP customers to call the agency for language support is another simple step that can ensure that LEP/NEP customers can access vital documents even if they have not yet been translated.

Stakeholder Recommendations

Section §1209 of the Language Access Act regulations designates the Mayor's Office on African Affairs (MOAA), the Mayor's Office on Asian and Pacific Islander Affairs (MOAPIA), and the Mayor's Office on Latino Affairs (MOLA) to serve as consultative bodies to OHR and assist in the implementation of the Language Access Act. These three groups conduct outreach to and provide demographic data on their respective LEP/NEP communities. They also provide input on agencies' Biennial Language Access Plans (BLAP), recruitment and hiring of bilingual staff, and quality assurance instruments for languages spoken by their constituents. Section §1209 of the regulations also names the DC Language Access Coalition (LA Coalition) as an external non-governmental body to consult on the implementation of the Act, data collection, Biennial Language Access Plans, and designation of covered entities with major public contact.

The following are recommendations provided by consultative agencies and the LA Coalition for strengthening citywide language access implementation in FY17:

LA COALITION RECOMMENDATIONS

- Increase outreach to LEP/NEP communities in their language to ensure that they understand their language access rights and resources.
- Adopt an improved and simplified complaint process that includes the issuance of fines against agencies that violate the Language Access Act and the payment of such fines to complainants.
- Proactive bilingual hiring which includes recurring face-to-face engagement of bilingual community leaders and community members.
- Stern compliance and enforcement on short and long term community planning and infrastructure development agencies like Office of Zoning, Office of Planning, Deputy Mayor on Planning and Economic Development, Department of Health and Department of Energy and the Environment as well as emergency and public health and safety agencies such as MPD, DMV and DC Courts.
- Implement annual surveys of LEP/NEP residents to directly identify complaints and suggestions by the impacted community regarding improvements to language assistance services. Also survey employees who provide language assistance to solicit suggestions for improving agency compliance.

Consultative Agencies

Learn more about consultative bodies at ohr.dc.gov/page/languageaccess.



MOLA RECOMMENDATIONS

- Standardize language access signage across major public contact agencies.
- Establish bilingual information centers at designated customer service locations to direct LEP/NEP constituents to appropriate services.
- Conduct well-structured outreach campaigns that include diverse LEP/NEP populations.
- Implement a quality control system within agencies for all translated vital documents released to the public; and
- Invest resources into consultative agencies for developing materials, tools, and additional resources to help covered entities with major public contact serve LEP/NEP populations.

MOAPIA RECOMMENDATIONS

- Collect and maintain accurate and reliable demographic data on agencies' customers and their language needs to ensure that access is being provided.
- Inform LEP/NEP residents about the availability of language assistance services by conducting regular outreach and by providing clear and easy-to-understand materials and language menus on webpages.
- Recruit and train culturally and linguistically competent bilingual frontline staff especially in agencies with major public contact.
- Implement a translation quality check system to ensure high quality and accurate translations; and
- Create a Language Access manual for employees which articulates consequences for non-compliance with the LAA.

MOAA RECOMMENDATIONS

- Encourage covered entities to hire qualified multilingual or bilingual staff in public-facing positions.
- Improve multilingual signage with appealing images and increasing visibility in order to make physical centers and services easier to navigate for LEP/NEP customers;
- Improve the accessibility of agency websites by including prominent language preference menus on agency home pages, and organize translated documents by language.
- Establish a quality control mechanism to ensure high quality of translated vital documents; and
- Promote Language Access training and cultural competency training for DC government employees in order to equip them with tools to strengthen their customer service and communication efforts as they serve constituent who are LEP/NEP.

Compliance Scorecards:

33 Major Public Contact Agencies

Data underlying the agency scores can be found beginning on page 66.



Alcoholic Beverage Regulation Administration



preparedness
3/4

ABRA improved its data collection mechanism in FY16 but has yet to train frontline staff on language access compliance requirements and resources.

accessibility
2/5

ABRA conducted outreach to LEP/NEP ABC licensees in FY16 and translated two documents into Spanish and Korean, but failed to provide translated materials in other languages or upload translated documents to its website.

quality
2/3

ABRA was not tested in FY16. While no complaints were filed against the agency, ABRA needs to make significant improvements in language access implementation in FY 17.



FY15 Score
7/12



FY16 Encounters
58

FY16 Top Languages Encountered:

Spanish, Korean, Amharic, Thai,
Tigrinya, Mandarin, French

OHR commends the Alcoholic Beverage Regulation Administration (ABRA) for improving its data collection mechanism in FY16 by adding a new data source and reporting considerably higher encounters as compared to FY15. ABRA also reported conducting outreach to LEP/NEP licensees and translating 2 new vital documents into Spanish and Korean.

While OHR commends ABRA for these achievements, the agency has yet to take intentional steps to meet basic preparedness and accessibility requirements needed to provide accessible services to new and existing LEP/NEP licensees and business owners.

Our reports indicate that despite repeated recommendations from OHR, ABRA staff were not trained on Language Access compliance requirements in FY16, and therefore remain unequipped to serve customers who do not speak English.

OHR strongly urges the agency to make provisions to address persistent compliance gaps in the first two quarters of FY17 by a) scheduling agency-wide language access compliance training for all public contact and field staff; b) working with OHR to prioritize and translate critical vital documents – such as license renewal notices, ABC license application, and training and orientation announcements - into top encountered languages and start using multilingual taglines; and c) making translated documents and multilingual informational videos accessible on the ABRA website.

Child and Family Services Agency



preparedness
4/4

With comprehensive data collection and proactive training, CFSA is well positioned to serve LEP/NEP constituents.

accessibility
5/5

CFSA translated case-specific documents in FY16 and plans to translate new vital documents in FY17. Agency can improve its accessibility by translating documents into high prevalence languages and by centralizingtranslated documents on its website.....

quality
4/5

No complaints were filed against CFSA in FY16. Field testing results indicated that three out of four telephone tests received language assistance.



FY16 Encounters
1462



Telephone Tests
3 out of 4 telephone tests provided the requested service, information, or appropriate resources.

FY15 Encounters: 626 **FY15 Score:** 12/14

FY16 Top Languages Encountered:

Spanish, Amharic, French, Cantonese, Mandarin, Vietnamese, Somali, Bengali, Tigrinya, Kinyarwanda

The Child and Family Services Agency (CFSA) continues to sustain focused efforts to provide meaningful access to LEP/NEP customers and to consistently meet planning and reporting requirements of the Language Access Act. OHR applauds CFSA's commitment to language access implementation over the years and notes the slight improvement in field testing results in FY16 indicating that 3 out of 4 telephone testers received language assistance.

OHR credits CFSA for providing language access compliance training to 710 employees in FY16 and for institutionalizing monthly language access trainings within the agency. In light of field testing results over the last two years, CFSA's commitment in its FY17/18 Biennial Language Access Plan to achieve 100% agency-wide training will be a critical step for ensuring that all call center frontline staff successfully provide language assistance to all LEP/NEP callers.

As stated in the feedback OHR provided on CFSA's FY17/18 BLAP, OHR encourages that the agency prioritize translation of documents into Vietnamese, Mandarin, and Amharic in FY17 as the agency's currently available translated documents are largely in Spanish. Additionally, CFSA should take steps to centralize vital documents under the 'language support' section of its website for easy download access. Finally OHR looks forward to working with CFSA in FY17 to ensure that grantees and contactors also comply with Language Access requirements and receive compliance training.

Department of Behavioral Health



preparedness
4/4

DBH fully met preparedness requirements in FY16 by training staff, partners and grantees, and by collecting comprehensive data on encounters with LEP/NEP customers.

accessibility
5/5

DBH translated 7 documents into Spanish and Chinese in FY16 and participated in 32 community events to engage LEP/NEP residents.

quality
5/5

All in-person and telephone testers received language assistance. No complaints were filed against DBH in FY16.



In-Person Tests

4 out of 4 in-person tests provided the requested service, information, or appropriate resources.



Telephone Tests

4 out of 4 telephone tests provided the requested service, information, or appropriate resources.

FY16 LEP/NEP Encounters: 8,312 **FY15 Score:** 12/14

FY16 Top Languages Encountered:

Spanish, Amharic, Chinese, Vietnamese, French, Mandarin, Russian, Arabic, Korean, Laotian

OHR commends the Department of Behavioral Health (DBH) for exemplary efforts in FY16 to provide quality language access services to LEP/NEP customers and for continuing to meet all requirements of the Language Access Act.

OHR credits DBH for achieving a perfect score in FY16 language access field testing results. All four telephone testers who called DBH's Access Helpline speaking in Arabic, Chinese, French and Spanish, as well as all four in-person testers who visited DBH's Multicultural Services Division speaking in Amharic, Arabic, French and Spanish all received language assistance through a bilingual employee or use of telephonic interpretation.

OHR also applauds DBH's ongoing work to continue strengthening the agency's accessibility and preparedness to serve LEP/NEP customers. In FY16, DBH a) reported 3,043 more encounters with LEP/NEP customers than in FY15, b) identified 600 customers tagged as LEP/NEP through its new ICAMS customer tracking software; c) provided over 6 language access compliance trainings to its staff, grantees and partners; and d) participated in numerous outreach events to engage linguistically and culturally diverse communities across the District.

In FY17, OHR encourages DBH to deepen language access training and technical assistance for its provider network to ensure all grantees and partners fulfill their legal obligations under the Language Access Act. As outlined in agency's FY17/18 Biennial Language Access Plan, DBH should also take steps to translate vital documents – especially outreach materials – into additional languages repeatedly encountered by the agency, and centralize all translated documents under the language support section of its website so that LEP/NEP customers and its staff can easily locate translated documents online.

Department of Consumer and Regulatory Affairs

9/14

overall compliance
score

preparedness

4/4

DCRA greatly improved agency preparedness by training over 400 employees on language access compliance and by collecting comprehensive data on FY16 encounters with

accessibility

3/5

DCRA translated multilingual taglines and two documents, and conducted extensive outreach specifically targeting diverse LEP/NEP populations. The agency needs to translate additional vital documents – such as notices, application forms, and instructions – that are critical to accessing its services.

quality

2/5

No complaints were filed against DCRA in FY16. However FY16 field test results indicate that 4 LEP/NEP customers were turned away and did not receive language assistance.



DEPARTMENT OF CONSUMER & REGULATORY AFFAIRS



In-Person Tests

7 out of 8 in-person tests provided the requested service, information, or appropriate resources.



Telephone Tests

8 out of 11 telephone tests provided the requested service, information, or appropriate resources.

FY16 LEP/NEP Encounters: 1,194 + 1 waiver **FY15 Score:** 5/14

FY16 Top Languages Encountered:

Spanish, Vietnamese, Amharic, Korean, Mandarin, French, Tigrinya, Arabic, Farsi

The Department of Consumer and Regulatory Affairs (DCRA) made much-needed improvements in FY16 and took significant steps to address compliance gaps. Over the course of the fiscal year, the agency trained over 400 employees on language access compliance, incorporated language access into new employee onboarding training, satisfied reporting requirements, and conducted outreach intentionally targeting culturally and linguistically diverse LEP/NEP populations in the District.

OHR is pleased to see that DCRA took action to address FY15 recommendations and improve the agency's preparedness to serve LEP/NEP customers. However, FY16 field testing results indicate that DCRA's critical economic development services remain inaccessible to customers who do not speak English. While all five testers who called or visited the Business Licensing Center received language assistance, 4 testers were turned away by the Permits Center, the Occupational and Professional Licensing Administration and the Small Business Resource Center. DCRA employees in these divisions failed to provide the needed interpretation services or translated documents by hanging up, transferring the call to another line, or by giving the tester documents in the wrong language.

OHR reiterates feedback provided on DCRA's FY17/18 Biennial Language Access Plan and stresses the need to take further action to ensure all frontline staff are trained and equipped to consistently provide the appropriate language assistance to LEP/NEP customers. OHR also urges DCRA to further enhance its data collection mechanism, translate and upload to its website the bulk of its vital documents, and improve signage indicating availability of language assistance in prominent public facing areas. Finally, DCRA needs to accelerate efforts to recruit bilingual staff who can bring to the agency much needed cultural and linguistic competence and reflect the diversity of the population it serves.

Department of Corrections



preparedness
2/4

DOC provided data on encounters but needs to improve its data collection mechanism. No language access training was provided to frontline staff in FY16.

accessibility
5/5

DOC translated 4 vital documents, uploaded documents on its website, and conducted targeted outreach in FY16 to reach culturally and linguistically diverse populations.

quality
2/3

DOC was not tested in FY16, and no complaints were filed against the agency. However, DOC needs to make significant improvements in language access implementation in FY 17.



FY15 Score
11/12



FY16 Encounters
532

FY16 Top Languages Encountered:

Spanish, French, Amharic, Arabic, Pashto, Turkish, Korean, Vietnamese, Chinese, Hindi

The Department of Corrections (DOC) embarked on an ambitious plan at the beginning of FY16 to work on critical language access compliance areas with a focus on staff training and vital document translation. OHR commends DOC for developing a strong plan, for translating four vital documents slated for translation, and for revamping the agency's language access and cultural competency training curriculum, which included the production of an educational video on language access compliance requirements. DOC also hosted an open house and conducted intentional outreach to ensure participation from LEP/NEP communities and stakeholders.

While OHR applauds these efforts, the agency's final FY16 report indicates that the agency did not train staff as planned. OHR urges DOC to take immediate steps to fulfill training requirements and ensure that all frontline staff are prepared and equipped to provide language access. DOC should equally accelerate efforts to translate prioritized vital documents into top encountered languages other than Spanish and ensure that public facing documents are available and easily accessible on the agency website. Finally, OHR recommends that DOC take steps to recruit bilingual staff given the level of encounters the agency has with Spanish speakers and the difficulty noted in providing telephonic interpretation services within the jails.

Department of Employment Services



preparedness
3/4

DOES reported comprehensive data on encounters with LEP/NEP customers but needs to take immediate steps to train staff to ensure they are prepared to serve LEP/NEP customers both in person and over the phone.

accessibility
4/5

DOES translated numerous vital documents and uploaded some on its website. No outreach was conducted in FY16.

quality
1/5

OHR received one public complaint against DOES in FY16, and 9 out of 13 telephone field tests did not receive language assistance.



FY16 Encounters
4,812



Telephone Tests
4 out of 13 telephone tests provided the requested service, information, or appropriate resources.

FY15 Score: 10/14

FY16 Top Languages Encountered:

Spanish, Amharic, Chinese, French, Vietnamese, Korean, Arabic, Tigrinya, Persian, Russian

The Department of Employment Services (DOES) made efforts in the first quarter of FY16 to bring the agency into greater compliance with translation requirements by translating more than 6 vital documents for its Unemployment Insurance unit into 6 languages, the SCSEP Participant and Host Handbooks into Spanish and Mandarin, and five other vital documents into Spanish. DOES also showed improvements in data collection and reported almost double the number of LEP/NEP encounters as compared to what the agency reported for FY15.

While OHR applauds the effort and resources DOES dedicated to meet its translation goals, FY16 field testing results indicate that nine out of 13 telephone testers who called the agency did not receive language assistance. DOES employees transferred testers who requested language assistance to the automated menu or a voicemail, hung up on the tester saying "I don't speak your language and can't help you", and asked testers to come in instead of calling so they could receive language assistance. Except for the Office of Wage and Hour where all testers were provided with assistance, all other DOES units including the American Job Centers performed poorly and failed to provide testers with interpretation services over the phone.

In light of these results, OHR urges DOES to take immediate steps to train and retrain all frontline staff. Despite repeated recommendations from OHR to provide agency-wide language access training, DOES has not taken steps to ensure that all staff who provide critical employment services to the community are equipped to do so in compliance with the Language Access Act. OHR looks forward to receiving a concrete plan of action for training all staff, especially those who staff frontline positions at the various American Job Centers.

Department of Energy and Environment



preparedness
4/4

DOEE continues to take all the necessary preparedness steps to guarantee meaningful access and linguistically competent services to LEP/NEP customers.

accessibility
5/5

DOEE conducted targeted outreach, translated vital documents into multiple languages, and prioritized additional vital documents for translation in FY17.

quality
3/3

No field tests were conducted at DDOE in FY16, and no complaints were filed against the agency.



FY15 Score
12/12



FY16 Encounters
2,512

FY16 Top Languages Encountered:

Spanish, Amharic, Korean, Chinese, Vietnamese, Tigrinya, Oromo, Haitian Creole

The Department of Energy and Environment (DOEE) continues to demonstrate exemplary commitment and steady efforts to provide equitable services to LEP/NEP constituents and ensure they can meaningfully participate in its programs. OHR commends DOEE for sustaining such efforts year after year and for consistently fulfilling all reporting requirements in a timely manner.

In FY16 alone, DOEE a) translated a total of 7 vital documents into Spanish, Amharic, Korean, Chinese, and Vietnamese; b) provided 4 language access trainings attended by 71 employees; c) conducted 13 educational outreach events and door-to-door engagement specifically targeting Latino, African, and Asian communities; and d) reported over 500 more encounters with LEP/NEP customers that what the agency reported for FY15.

As stated in OHR's feedback to DOEE's FY17/18 Biennial Language Access Plan, DOEE can build on its successful implementation of the Language Access Act by turning attention towards grantee oversight to ensure grantees and contractors comply with language access requirements and receive training. Additionally, OHR recommends that DOEE focus FY17 efforts on bilingual staff recruitment and certification of existing bilingual staff. Finally, DOEE should continue efforts to consolidate all translated vital documents into an easily accessible language-specific section of the DOEE website.

Department of Health



preparedness
1/4

Agency provided data on LEP/NEP encounters but did not meet reporting or training requirements in FY16.

accessibility
1/5

DOH provided no data on the provision of language assistance, vital document translations, or outreach to LEP/NEP communities for FY16.

quality
0/5

FY16 testing results indicate that 10 out of 12 telephone testers and 3 out of 8 in-person testers were turned away. One complaint was filed against DOH in FY16.

GOVERNMENT OF THE DISTRICT OF COLUMBIA



In-Person Tests

5 out of 8 in-person tests provided the requested service, information, or appropriate resources.



Telephone Tests

2 out of 12 telephone tests provided the requested service, information, or appropriate resources.

FY16 LEP/NEP Encounters: 26,150 **FY15 Score:** 3/14

FY16 Top Languages Encountered:

No data

The Department of Health (DOH) continues to exhibit significant deficiencies in language access compliance. With no implementation reports submitted for FY15 or FY16, OHR is unable to assess agency's interactions with LEP/NEP customers or any language access-related activities undertaken over the last two fiscal years.

A language access complaint was filed against DOH in FY16 and the agency was found in non-compliance. Additionally, FY16 field testing results indicate that 10 out of 12 telephone testers and 3 out of 8 in-person testers were turned away without language assistance. Having failed to meet basic preparedness, accessibility or reporting requirements for language access compliance, DOH remains unequipped to serve LEP/NEP customers who need to access the District's health and wellness services.

Based on these findings, OHR has put the agency on notice to take immediate steps and demonstrate corrective measures will be taken to mitigate compliance gaps. Although submitted late, DOH's FY17/18 Biennial Language Access Plan contains practical first steps for bringing the agency into compliance. OHR will closely monitor DOH's FY17 efforts to implement this plan and meet legally mandated compliance requirements under the Language Access Act.

Department of Housing and Community Development



preparedness
0/4

DHCD did not provide data on FY16 encounters with LEP/NEP customers or staff training on language access compliance.

accessibility
1/5

DHCD has yet to translate vital documents slated for translation since FY13. No outreach efforts were reported in FY16.

quality
4/5

All five in-person tests conducted at DHCD in FY16 provided language assistance. No complaints were filed against the agency. However, DHCD needs to make significant improvements in language access implementation in FY 17.



FY15 Score
4/12



FY15 Encounters
No data reported

FY14 Score: 8/14 **FY15:** No data

FY16 Top Languages Encountered:

No data

OHR credits the Department of Housing and Community Development (DHCD) for FY16 language access field testing results indicating that language access was provided for all five in-person tests conducted at DHCD's Housing Resource Center. For all tests, agency employees contacted Language Line Solutions to provide interpretation services.

While DHCD submitted a comprehensive FY17/18 Biennial Language Access Plan (BLAP), the agency failed to meet all reporting requirements for FY16. As was the case in FY15, OHR has no records of the agency's encounters with LEP/NEP customers or any efforts undertaken over the last two fiscal years to address ongoing gaps in compliance.

In its FY15 compliance report, OHR urged DHCD to create a comprehensive data collection system, train frontline staff, translate vital documents, conduct outreach, and bring its large network of service providers and grantees into compliance with language access requirements.

While DHCD's BLAP outlines action items that have the potential to begin addressing these compliance gaps, the agency has failed to report any corrective action taken in the last two years in response to OHR feedback. The agency is advised to reach out to OHR immediately to develop a course of action that will set DHCD on the right course to meet legally mandated compliance requirements under the Language Access Act.

Department of Human Resources



preparedness
4/4

DCHR met all preparedness requirements in FY16 by training all staff on language access compliance and by enhancing its data collection mechanism.

accessibility
5/5

DCHR conducted targeted outreach to LEP/NEP job seekers in FY16 and translated vital documents into Spanish.

quality
3/3

DCHR was not tested in FY16 and no complaints were filed against the agency.

dchr

DC Department of Human Resources



FY15 Score
12/12



FY16 Encounters
80

FY16 Top Languages Encountered:

Spanish, French, Tagalog, Amharic, Chinese, and Japanese

OHR once again applauds the Department of Human Resources (DCHR) for sustaining efforts to meet language access compliance requirements. While DCHR is primarily an inward-facing agency which interacts primarily with District government employees and English-proficient job seekers, DCHR still reported almost double the encounters reported in FY15. This is due to successful implementation of a comprehensive strategy for capturing all interactions – whether face to face, over the telephone, or over email – with LEP/NEP individuals.

DCHR participated in 13 outreach events in FY16 and collaborated with the Mayor's Constituency Offices to provide targeted employment support activities with intentional outreach materials translated into threshold languages. DCHR also provided a refresher language access training open to all agency employees.

OHR credits DCHR for these achievements, and for developing a comprehensive FY17/18 Biennial Language Access Plan which includes a plan for new employee training and for ongoing improvements to DCHR's data collection strategy. In FY17, OHR encourages DCHR to work with OHR in support of covered entities' efforts to promote best practices for recruiting and certifying bilingual staff.

Department of Human Services



preparedness
4/4

DHS has a comprehensive data collection mechanism in place and trained all front-line staff in FY16.

accessibility
3/5

DHS translated vital documents into 6 different languages and conducted targeted outreach to engage LEP/NEP communities. DHS has yet to create language support pages and upload translated documents onto its website.

quality
1/5

OHR received two public complaints against DHS in FY16. 18 out of 19 in-person testers and 4 out of 15 telephone testers received language assistance.



In-Person Tests

18 out of 19 in-person tests provided the requested service, information, or appropriate resources.



Telephone Tests

4 out of 15 telephone tests provided the requested service, information, or appropriate resources.

FY16 LEP/NEP Encounters: 63,250 **FY15 Score:** 9/14

FY16 Top Languages Encountered:

Spanish, Amharic, French, Mandarin, Vietnamese, Cantonese, Korean, Tigrinya, Arabic, Bengali

OHR credits the Department of Human Services (DHS) for continuing to take on drastic process improvement measures in FY16 to better fulfill language access compliance requirements and meet the needs of its robust LEP/NEP customer base.

Building on work initiated in FY15, DHS boasts many accomplishments in FY16 aimed at fortifying the agency's language access preparedness: a) hiring 10 bilingual employees, b) certifying existing bilingual employees, c) adopting an agency-wide bilingual staff policy; d) creating a "Language Access Customer Advisory Group," composed of LEP/NEP customers and stakeholders who will advise on strategies to strengthen accessibility of DHS services; e) training and retraining nearly all front-line staff and creating a hands-on language access training manual; and f) improving data collection by adding a new data source for capturing demand for language assistance by service center.

DHS also reported having produced a total of 145 translated vital documents and participating in 12 public education and community events in FY16. FY16 field test results conducted at various DHS sites indicated that 18 out of 19 in-person testers and 4 out of 15 telephone testers successfully received language assistance. OHR commends DHS for in-person testing scores but must assert chronic barriers persist with provision of language assistance over the phone. Two public language access complaints were also filed against DHS in FY16, indicating that the agency still has work to do in improving customer service to LEP/NEP customers.

As stated in the feedback to DHS' proposed FY17/18 Biennial Language Access Plan, OHR urges the agency to prioritize senior staff training in FY17 so as to further strengthen agency-wide commitment to language access and ensure all public facing staff receive ongoing language access training. OHR also looks forward to updates on the appointment of a Language Access Ombudsman at each service center, as this role will be critical in creating and institutionalizing a culture of inclusion and access at the service center level.

Department of Motor Vehicles



preparedness
2/4

DMV needs to provide timely reports on encounters with LEP/NEP customers and training of frontline staff.

accessibility
4/5

DMV translated 10 vital documents and provided multiple information sessions specifically targeting LPL applicants.

quality
2/5

19 out of 20 in-person testers received assistance. However four complaints were filed against DMV in FY 16 and the agency needs to continue efforts to improve quality of services provided to LEP/NEP customers.



In-Person Tests

19 out of 20 in-person tests provided the requested service, information, or appropriate resources.



FY16 Encounters
5697

FY15 Score: 11/14

FY16 Top Languages Encountered:

Spanish, Amharic, Chinese, French, Vietnamese, Korean

OHR credits the Department of Motor Vehicles (DMV) for showing steady improvements over the years in language access testing scores. Out of 20 in-person tests conducted at DMV service centers in FY16, all but one tester received language assistance.

In FY16, DMV continued partnering with OHR and the Mayor's Office on Latino Affairs (MOLA) to respond to the agency's growing need for linguistic capacity to successfully serve increasing numbers of LEP/NEP customers seeking Limited of the Limited Purpose License (LPL) credentials. In addition to hosting targeted information sessions for LPL applicants, DMV worked with OHR to pilot the Bilingual Navigator Program. Initiated in August 2016, OHR placed 4 Spanish-speaking bilingual navigators at each of the DMV centers where they assisted LEP/NEP customers in navigating DMV services and provided technical assistance to DMV employees on provision of language access. This program assisted 4,944 customers and received positive feedback from both DMV employees and customers.

While these outcomes are promising, and FY16 testing results point to clear improvements in language access services provided to LEP/NEP customers, OHR urges DMV to keep on task on all reporting and accessibility compliance requirements. DMV has yet to report complete data on FY16 encounters, vital document translation, outreach efforts, or on training of frontline staff for all four quarters. DMV needs to also report on steps taken to revamp its language access training, policy, and procedures in order to ensure that the agency remains prepared and fully equipped to maintain

Department of Parks and Recreation



preparedness
4/4

DPR improved its preparedness by training some frontline staff and by refining its data collection mechanism to capture encounters with LEP/NEP customers through multiple data points.

accessibility
4/5

DPR translated vital documents in multiple languages and conducted proactive outreach to engage diverse LEP/NEP populations.

quality
2/5

No complaints were filed against DPR in FY16; however, all seven telephone testers were denied language assistance during the field tests.



FY16 Encounters
1150



Telephone Tests
0 out of 7 telephone tests provided the requested service, information, or appropriate resources.

FY15 Score: 10/14

FY16 Top Languages Encountered:

Spanish, Amharic, French, Mandarin, Vietnamese, German, Italian, Russian, Arabic, and Persian

OHR credits DPR for focused efforts to institute new tools to improve its data collection mechanism, as this is a foundational requirement for responding to LEP/NEP customer needs and compliance with the Language Access Act. OHR also applauds DPR's commitment to bilingual staff recruitment and efforts to reach diverse LEP/NEP communities through partner organizations and ethnic media.

FY16 field testing results indicated that none of the 7 telephone testers who called two DPR recreation centers and the Customer Service Office were able to receive language assistance. With no language assistance being provided for all callers both in FY15 and FY16, the lack of accessibility of its services over the phone presents a real challenge and a glaring gap in compliance. While community engagement, bilingual hiring efforts, and online accessibility of translated vital documents remain DPR's strengths, FY15 and FY16 testing scores indicate that the agency's frontline staff are still not equipped to serve LEP/NEP customers.

DPR needs to take immediate steps to address this gap in compliance by training all frontline staff in language access compliance requirements, and providing them the resources they need to serve LEP/NEP customers. DPR should also execute plans to translate additional vital documents slated for translation over the FY17/18 Biennial Language Access Plan period and ensure that contractors and grantees are also made aware of Language Access requirements, including requiring a signed agreement confirming their compliance. In addition, OHR urges DPR to take immediate steps to train its frontline employees in language access requirements and resources, as none of the telephone field tests conducted at the Customer Service Office, the Petworth Recreation Center, and the Raymond Recreation Center resulted in language access assistance.

Department of Public Works



preparedness
3/4

DPW improved data collection and trained key frontline staff on language access compliance requirements and resources.

accessibility
4/5

DPW translated four vital documents into Spanish in FY16, made these documents accessible online, and conducted sanitation education sessions. DPW needs to translate documents in other top languages encountered by the agency.

quality
2/5

No complaints were filed against the agency in FY16, however all five telephone testers who called DPW units were denied language access.



“The Preferred Choice”



FY16 Encounters
202



Telephone Tests
0 out of 5 telephone tests provided the requested service, information, or appropriate resources.

FY15 LEP/NEP Encounters: 169 FY15 Score: 8/14

FY14 Score: 10/12

FY16 Top Languages Encountered:

Spanish, French, Chinese, Italian, Bengali, Vietnamese

OHR commends the Department of Public Works (DPW) for executing an ambitious training plan in FY16 and for meeting this foundational compliance requirement by training hundreds of field staff on language access compliance and resources. OHR also credits DPW for conducting outreach to LEP/NEP communities, for maintaining a linguistically accessible website, and for translating vital documents into Spanish in FY16.

While OHR acknowledges these steps taken by the agency to improve compliance levels, FY16 testing results point to significant barriers to access for LEP/NEP customers. None of the five telephone tests performed at DPW's Parking Enforcement and Solid Waste Education and Enforcement units received language assistance. Agency employees hung up on three of the testers and transferred two of the calls to OHR and the automated menu for 3-1-1 without any explanation.

In light of these findings, OHR urges DPW to take immediate action to ensure that all frontline staff are trained and adequately equipped to provide language assistance. As indicated in its feedback on DPW's FY17/18 Biennial Language Access Plan, OHR recommends that the agency achieve 100% training of all frontline staff and certify bilingual staff who can help the agency better meet the needs of its LEP/NEP customers. Finally, DPW should continue efforts to develop an agency-wide policy which will instruct and enable all DPW (especially field staff) to provide language assistance, track encounters with LEP/NEP customers, and report back to the Language Access Coordinator.

Department of Small and Local Business Development



preparedness
2/4

DSLBD reported LEP/NEP encounters in FY16 but did not provide language access compliance training to frontline staff or grantees.

accessibility
2/5

DSLBD's quarterly reports do not indicate that the agency translated vital documents or conducted outreach in FY16.

quality
2/3

DSLBD was not tested and no complaints were filed against the agency in FY16. However, DSLBD needs to take proactive steps to improve language access implementation in FY16.



FY15 Score
6/12



FY16 Encounters
114

FY16 Top Languages Encountered:

Spanish, Vietnamese

OHR credits the Department of Small and Local Business Development (DSLBD) for developing a Biennial Language Access Plan (BLAP) for the FY17/18 implementation period outlining critical preparedness steps the agency intends to take to address persisting gaps with language access compliance.

While DSLBD's BLAP declares intentions to address compliance gaps in translation of vital documents, outreach, and data collection, the plan does not provide details on specific steps the agency will take to meet these requirements. OHR therefore urges DSLBD to resubmit the plan after including specific action steps, strategies, and activities to be pursued in FY17 and 18 to meet the compliance requirements set forth by the Language Access Act for covered entities with major public contact.

OHR stresses that given the high demand for the economic development services DSLBD provides and the presence of a large LEP/NEP-led businesses community operating in the District, it is essential that the agency take steps to eliminate all linguistic barriers and increase its accessibility to the LEP/NEP public. Translating vital documents into high prevalence languages, training staff and grantees on their legal obligation to provide language assistance, and engaging in proactive outreach specifically targeting LEP/NEP communities are some of the critical compliance components DSLBD needs to prioritize in FY17. Finally, OHR urges DSLBD to comply with reporting requirements in a consistent manner and ensure that all FY17 quarterly reports are submitted in a timely manner.

Department of Disability Services



preparedness
3/4

DDS improved data collection and reporting on LEP/NEP encounters but needs to train all front-line staff on language access compliance to be better prepared to serve LEP/NEP customers.

accessibility
4/5

DDS translated documents into its top 8 encountered languages and participated in over 30 outreach events. DDS can improve accessibility by revamping language access signage, centralizing translated documents online, and fine-tuning outreach efforts to better target LEP/NEP populations.

quality
4/5

Two telephone testers and one in-person tester were denied language assistance. No complaints were filed against DDS in FY16.



In-Person Tests

4 out of 5 in-person tests provided the requested service, information, or appropriate resources.



Telephone Tests

4 out of 6 telephone tests provided the requested service, information, or appropriate resources.

FY16 LEP/NEP Encounters: 505 FY15 Score: 10/14

FY16 Top Languages Encountered:

Spanish, Arabic, Mandarin, Amharic, Chinese, French, Korean, Vietnamese

OHR credits the Department on Disability Services (DDS) for consistent efforts to address compliance gaps and steady progress made by the agency over the last two years to strengthen its capacity to serve LEP/NEP customers. In FY16, DDS a) reported data on encounters from multiple sources of data; b) produced a total of 20 multilingual vital documents translated into 8 languages; c) conducted extensive community outreach with some engagement of LEP/NEP populations; and d) trained all new employees on language access compliance requirements and resources.

OHR further credits DDS for improved scores on FY16 field testing results indicating that all but one in-person tester and 2 telephone testers received language assistance. While these scores show some progress when compared to FY15 results, DDS still needs to take steps to fully eliminate barriers preventing LEP/NEP customers from accessing critical services. FY16 testing results also indicated that the lack of adequate signage at public-facing locations prevented one of the in-person testers from identifying his language for the DDS employee, and in the two telephone tests that did not receive language assistance, agency employees hung up on the testers without any explanation.

As noted in OHR's FY15 compliance report, DDS needs to take immediate action in FY17 to meet language access training requirements and ensure that all frontline staff – including those who receive the agency's incoming calls – receive clear guidance and comprehensive training on language access compliance. Including a language access module in new employee training and ensuring that new hires are aware of the requirements is a good first step. However, DDS has yet to provide in-depth training for staff or comply with repeated recommendations to achieve agency-wide training.

District Department of Transportation



preparedness
4/4

DDOT reported double the encounters it reported in FY15 and trained frontline staff on language access compliance.

accessibility
3/5

DDOT generated 27 translated vital documents in FY16. The agency needs to ensure access to translated documents online and prioritize targeted outreach to directly engage LEP/NEP customers.

quality
3/3

DDOT was not tested in FY16 and no complaints were filed against the agency.



District Department of Transportation



FY15 Score
9/12



FY16 Encounters
317

FY16 Top Languages Encountered:

Spanish, Korean, Chinese

OHR applauds the District Department of Transportation (DDOT) for steady progress on language access compliance and for taking steps to ensure that the agency is prepared to meet the needs of LEP/NEP individuals who live, work, and visit the District of Columbia.

In FY16, DDOT continued training public contact staff on language access compliance and on resources they can use to provide quality service to LEP/NEP customers. DDOT also certified bilingual employees and produced a total of 27 translated vital documents in 6 different languages. DDOT clearly demonstrated a commitment to equitable access for LEP/NEP customers in FY16 by allocating the resources needed to meet all compliance requirements and by investing in the infrastructure and tools needed to serve multilingual populations.

OHR encourages DDOT to focus FY17 efforts on ensuring that all of its multilingual public-facing vital documents are uploaded on its website for easy access to LEP/NEP readers and expanding its data collection strategy to ensure that all interactions with the public are documented and tracked. Additionally, DDOT has yet to develop a strategy for training all field staff on language access compliance, equipping them with the tools they need to adequately serve LEP/NEP customers, and recording their encounters. Finally, as highlighted in the agency's FY17/18 Biennial Language Access Plan, DDOT should work to expand outreach using diverse methods such as multilingual press releases and dissemination of information through ethnic media outlets.

District of Columbia Housing Authority



preparedness
1/4

DCHA reported incomplete data on encounters with LEP/NEP customers in FY16. No language access trainings were reported.

accessibility
3/5

DCHA conducted targeted outreach to LEP/NEP residents and advocates in FY16. The agency did not report translating vital documents.

quality
3/5

Only 3 out of 5 telephone field tests conducted at DCHA in FY16 received language assistance. No complaints were filed against the agency in FY16, but the agency needs to address recurring issues with quality of services provided to LEP/NEP callers.



FY16 Encounters
192



Telephone Tests
3 out of 5 telephone tests provided the requested service, information, or appropriate resources.

FY15 Score: 12/14

FY16 Top Languages Encountered:

Spanish, Chinese, Vietnamese, Amharic, Tigrinya, Russian, Haitian Creole, French, Arabic and Pashto

OHR acknowledges that the DC Housing Authority (DCHA) took steps over the last two years to address long-standing gaps in language access compliance and lay the groundwork to ensure that the agency is fully equipped to serve LEP/NEP customers. However, the agency did not successfully maintain momentum in FY16 to implement many of its goals and corrective actions.

Enhancing data collection strategies, improving signage, translation of vital documents used by the Office of Fair Hearings, and training of frontline staff on a newly adopted language access policy were some of the agency's compliance goals and corrective actions. DCHA's FY16 reports submitted to OHR do not reflect progress made on any of these commitments or provide information on language access compliance activities undertaken over the last fiscal year.

In addition to these gaps in compliance, OHR notes that FY16 field testing results indicated that only 3 out of 5 telephone tests conducted at DCHA's Customer Call Center received language assistance. Given a history of non-compliance in the agency's accessibility to LEP/NEP over the phone, OHR urges DCHA to take immediate action to re-train the Call Center staff and update its policy to include disciplinary measures for employees who deny services to LEP/NEP callers.

In addition to addressing ongoing issues with quality of services provided to LEP/NEP callers via the agency's Call Center, OHR urges DCHA to meet reporting requirements in FY17 and send an update on the agency's progress with outstanding corrective actions and BLAP goals to OHR.

District of Columbia Lottery and Charitable Games Board



preparedness
1/4

DCLB reported encounters with LEP/NEP customers but data collection was not comprehensive. The agency did not provide language access compliance training to frontline staff in FY16.

accessibility
3/5

DCLB reported translating two vital documents in FY16 but did not conduct outreach to engage LEP/NEP communities. The agency needs to translate a description of its services and create a 'language support' section on its website.

quality
2/3

DCLB was not tested in FY16 and no complaints were filed against the agency. The agency needs to take proactive steps in FY17 to improve its compliance standing.



FY15 Score
4/12



FY16 Encounters
31

FY16 Top Languages Encountered:

Spanish, Korean, Mandarin, Hindi

The DC Lottery and Charitable Games Control Board (DCLB) took steps in FY16 to meet a number of foundational compliance requirements of the Language Access Act and developed a Biennial Language Access Plan (BLAP) to guide its efforts over the FY17/18 compliance period.

OHR credits DCLB for taking this important planning step, and notes that adding specific strategies and timetables for achieving the desired compliance outcomes will greatly strengthen the BLAP and render it more actionable. OHR requests that DCLB complete the BLAP by adding specific action steps it will take to ensure that the agency is positioned to collect comprehensive data on encounters with LEP/NEP customers and which strategies it will deploy to meet outreach requirements and engage the District's diverse LEP/NEP communities.

DCLB reported that two claims-related documents were translated into Spanish and Korean in FY16. OHR encourages the agency to translate these documents into additional languages encountered District-wide in FY17 and make all translated vital documents, including a basic description of agencies services, available on its website using the standardized "language support" templates used by other agencies with major public contact. Additional outstanding compliance areas DCLB should prioritize for immediate action in FY17 include language access compliance training for all partners and frontline staff and timely submission of quarterly reports.

District of Columbia Office of Zoning



preparedness
4/4

DCOZ reports comprehensive data on LEP/NEP encounters and ensures that its frontline staff are trained on language access compliance and resources.

accessibility
5/5

DCOZ translated vital documents into 6 languages and made them available online. DCOZ met outreach requirements but needs to develop new strategies for reaching LEP/NEP populations.

quality
2/3

One complaint was filed against DCOZ in FY16. The complaint was dismissed. The agency was not tested in FY16.



FY15 Score
12/12



FY16 Encounters
14

FY16 Top Languages Encountered:

Spanish, Korean

OHR commends the Office of Zoning (DCOZ) for its ongoing commitment to and effective implementation of Language Access Act compliance requirements. In FY16, DCOZ has continued to take proactive measures to meet reporting requirements and enhance the agency's preparedness to serve LEP/NEP customers by ensuring that all frontline staff are trained on effective provision of language assistance.

DCOZ has also translated critical vital documents in FY16, including instructions for requesting language assistance for public hearings, into 6 of the District's high prevalence languages, and made them available on its website. Together with the introductory "Zoning 101" tutorial now available in multiple languages, DCOZ has successfully created multilingual entry points for LEP/NEP residents and businesses to learn about the agency and access its services.

DCOZ continues to report minimal encounters with LEP/NEP customers. As stated in OHR's feedback to DCOZ's FY17/18 Biennial Language Access Plan, the agency should continue to experiment with strategies for reaching LEP/NEP populations who are currently not participating in and accessing the agency's services. OHR looks forward to working with DCOZ on developing concrete plans for targeted outreach in FY17.

District of Columbia Office on Aging



preparedness
2/4

DCOA provided data on LEP/NEP encounters and language access compliance training in FY16. The agency needs to meet reporting and planning requirements in FY17 and improve reporting on encounters.

accessibility
4/5

DCOA translated event-specific documents and conducted outreach to LEP/NEP seniors. Agency needs to take immediate steps to update its website and improve access to translated vital documents.

quality
2/3

DCOA needs to make significant improvements in language access implementation in FY 17.



FY15 Score
11/12



FY16 Encounters
860

FY16 Top Languages Encountered:

Spanish, Chinese, Korean, Amharic, Vietnamese, French

OHR credits the DC Office on Aging (DCOA) for a track record of strong compliance with the requirements of the Language Access Act, and for ongoing efforts to provide full access and quality services to the District's LEP/NEP senior population.

In FY16, DCOA trained frontline staff and managers on language access compliance and participated in numerous community events, some of which specifically targeted LEP/NEP senior communities. DCOA also hosted a linguistically-accessible budget town hall with interpretation and translated presentations for LEP/NEP seniors from Asian and Latino communities, and generated a needs assessment survey in 6 different languages.

While DCOA took steps to meet a number of compliance requirements in FY16, the agency failed to satisfy reporting and planning requirements which are critical for sustaining and improving on achievements that have been made in previous years. DCOA did not submit its FY17/18 Biennial Language Access Plan (BLAP) or complete quarterly reports in a timely manner. OHR therefore urges DCOA to immediately submit a draft BLAP and ensure that all FY17 quarterly reporting requirements are entered on time.

OHR once again advises DCOA to ensure that titles of translated documents are in the language of the document and not in English and centralize all translated vital documents (such as the Long Term Care Guide) under the 'language support' section of its website where they can be more easily accessed.

District of Columbia Public Library



preparedness
4/4

DCPL reported comprehensive data on LEP/NEP encounters and trained new hires on language access compliance.

accessibility
5/5

DCPL translated vital documents and centralized them by language on its website.

quality
3/3

DCPL was not tested in FY16 and no complaints were filed against the agency.



FY15 Score
12/12



FY16 Encounters
21,079

FY16 Top Languages Encountered:

Spanish, Chinese, French, Russian, Amharic, Urdu, Japanese, Portuguese, Arabic, and Persian

OHR commends the DC Public Library (DCPL) for once again receiving a perfect language access compliance score and for sustaining exemplary implementation of the Language Access Act requirements over the last three years.

In FY16, DCPL continued providing systematic language access compliance training for its new hires via face-to-face trainings and an online module, and participated in numerous outreach events specifically targeting LEP/NEP residents. DCPL also developed an internal process for translating documents, translated program-related vital documents into Spanish and Amharic, and translated agency-wide vital documents prioritized in its FY15/16 Biennial Language Access Plan into 6 languages.

The availability of translated vital documents organized by language on the DCPL website is a best practice which greatly improves online accessibility for LEP/NEP users and agency staff alike. However as recommended in the agency's FY15 scorecard, OHR advises DCPL to ensure that LEP/NEP readers can easily identify the documents in their language by a) replacing the dropdown menu for selecting languages with a hyperlinked list of each language directly on the homepage, and b) by converting the individual titles of translated documents from English into the language used in the document.

OHR looks forward to working with DCPL on providing refresher training for DCPL employees in FY17 and supporting DCPL's efforts to send email notifications to library guests in their primary language.

District of Columbia Public Schools

8/14

overall compliance
score



DISTRICT OF COLUMBIA
PUBLIC SCHOOLS



In-Person Tests

28 out of 30 in-person tests
provided the requested service,
information, or appropriate
resources.



Telephone Tests

10 out of 29 telephone tests
provided the requested service,
information, or appropriate
resources.

preparedness

3/4

DCPS did not meet training requirements in
FY16 and remains unprepared to serve ELL
students and LEP/NEP families.

FY16 LEP/NEP Encounters: 22,394 **FY15 Score:** 10/14

FY16 Top Languages Encountered:

Spanish, Amharic, French, Vietnamese, Russian, Chinese,
Arabic, Bengali, Tigrinya, Tagalog

accessibility

4/5

DCPS translated vital documents and
conducted extensive outreach to LEP/NEP
families.

OHR credits the District of Columbia Public Schools (DCPS) for its FY16 in-person field testing scores indicating that 28 out of 30 testers who visited one of eight DCPS high schools with large English Language Learner (ELL) student populations received language assistance. On the other hand, only 10 out of the 29 tests conducted in these same schools over the phone received language assistance. Testing results also indicated that many of the calls made by testers in languages other than Spanish were hung up on, and that 5 out of the 8 tested schools did not display appropriate signage indicating availability of language assistance.

While DCPS reported training 18 frontline staff on language access compliance in FY16, the agency has not complied with training requirements or met long-standing corrective action commitments to train central office staff and front-line staff from prioritized schools with over 25% Linguistically and Culturally Diverse (LCD) student populations. OHR once again strongly urges DCPS to take immediate action to fulfill this foundational compliance requirement in FY17 and reiterates that without such training, DCPS will remain unprepared and unequipped to serve its growing population of ELL students and LEP/NEP families.

Additionally in FY17, OHR encourages DCPS to continue building on its strong community engagement work with LEP/NEP families and sustain the practice of centralizing translated vital documents on the website.

quality

1/5

One public complaint was filed against DCPS
in FY16. Field testing results indicated that
28 out of 30 in-person tests and 10 out of 29
telephone tests received language assistance.

Fire and Emergency Medical Services Department



preparedness
2/4

FEMS needs to take immediate steps to fulfill data collection and reporting requirements and ensure that all frontline staff receive language access compliance training.

accessibility
1/5

FEMS did not report that vital documents were translated or that outreach activities were conducted in FY16.

quality
3/3

No complaints were filed against FEMS in FY16. Agency was not tested in FY16. FEMS showed significant improvements in language access implementation in FY16.



FY16 Encounters
47



FY15 Score
4/14

FY15 Encounters: No data **FY14 Score:** 4/14

FY16 Top Languages Encountered:

No data

OHR credits the DC Fire and Emergency Medical Services (FEMS) showing commitment to language access compliance in FY16 and for developing an aggressive plan for meeting the requirements of the Language Access Act.

OHR acknowledges that FEMS in fact took promising steps in FY16 to invest in technology and infrastructure needed to equip its first responders with cell phones and the appropriate tools needed for accessing interpretation services. While FEMS indicated in its FY15/16 Biennial Language Access Plan that the agency would train public contact employees through an online training module, make language line usage instructions available on FEMS computers and posters, and distribute booklets to assist frontline staff with language identification, the agency's FY16 reports do not provide implementation updates.

FEMS also indicated that a field for tracking language needs has been added to its patient tracking software, yet the agency did not report any data on encounters in FY16. Based on data that OHR gleaned from the agency's usage of telephonic interpretation services, FEMS provided interpretation for 47 LEP/NEP patients in FY16.

OHR urges FEMS to take swift action to bring promising plans and efforts to fruition in FY17 so as to provide full access and adequate emergency and safety services to LEP/NEP individuals in the District. FEMS needs to immediately complete and submit to OHR its FY17/18 BLAP and consistently meet reporting requirements in FY17.

Homeland Security and Emergency Management Agency



preparedness
3/4

HSEMA trained staff on language access compliance and reported encounters with LEP/NEP customers. The agency still needs to improve its data collection mechanism in FY17.

accessibility
3/5

HSEMA conducted extensive outreach in FY16 but did not translate any vital documents.

quality
2/3

HSEMA was not tested in FY16 and no complaints were filed against the agency. HSEMA needs to make significant improvements in language access implementation in FY17.



FY15 Score
7/12



FY16 Encounters
194

FY16 Top Languages Encountered:

Chinese, Spanish, Amharic, Mandarin

OHR credits the Homeland Security and Emergency Management Agency (HSEMA) for taking steps in FY16 to improve the agency's accessibility and preparedness to serve LEP/NEP customers. The agency trained 160 employees on language access compliance, reported data on FY16 encounters, and carried out targeted outreach to inform linguistically and culturally diverse communities about HSEMA programs and services.

While OHR applauds these efforts, HSEMA has significant work to do in FY17 to address long-standing gaps in compliance. HSEMA needs to translate vital documents into high prevalence languages and, as prioritized in its FY15/16 Biennial Language Access Plan (BLAP), start with getting an updated description of its programs and services translated. Without this information in different languages, the agency's outreach efforts will not be fully effective in ensuring that LEP/NEP populations have the tools they need to be prepared for emergency and disaster situations.

Comprehensive data collection and reporting also continues to be an area of improvement, as HSEMA has not yet succeeded in tracking encounters and collecting data from all points of public contact. In FY17, HSEMA needs to identify and implement practical strategies for collecting and reporting comprehensive data on all interactions with LEP/NEP customers.

Finally, OHR looks forward to seeing in FY17 the full implementation of the plans outlined in the agency's FY17/18 BLAP including the development of a new website with a language support section allowing LEP/NEP readers to easily access emergency preparedness information in their language.

Metropolitan Police Department



preparedness
3/4

MPD has a comprehensive system in place for data collection but needs to train all frontline staff to ensure all employees are equipped to serve LEP/NEP individuals.

accessibility
3/5

MPD conducted extensive outreach and engaged diverse LEP/NEP communities but did not report translating vital documents in FY16.

quality
3/5

MPD provided language assistance to all eight in-person testers who visited three District police stations. However, four complaints were filed against MPD in FY16.



In-Person Tests
8 out of 8 in-person tests
provided the requested service,
information, or appropriate
resources.



FY16 Encounters
5,195

FY15 Score: 8/14

FY16 Top Languages Encountered:

Spanish, Mandarin, Amharic, Vietnamese, Korean, Arabic,
Japanese, French, Bengali, Portuguese

OHR congratulates the DC Metropolitan Police Department (MPD) on the perfect score it received for FY16 field testing results indicating that all testers who visited the Fourth, Fifth, and Sixth District police stations received language assistance.

In FY16, MPD established a Language Access Program with dedicated staff to oversee the agency's work on language access compliance and reported having certified 212 bilingual officers. OHR applauds these two achievements, which demonstrate the agency's commitment to fully meet Language Access Act requirements and institutionalize its implementation. MPD also reported comprehensive data on encounters with LEP/NEP individuals, adopted a comprehensive internal language access policy, and improved language access signage in its District stations and specialized units to better inform LEP/NEP individuals about their right to obtain assistance in their native language.

While MPD continues to show consistent dedication to improving access to LEP/NEP communities, the agency has failed to meet training requirements since FY14. OHR urges MPD to take immediate action and provide agency-wide language access compliance training in the second quarter of FY17. OHR has provided feedback on MPD's draft online training module and expects to review a revised version for final approval. MPD needs to equally prioritize translation of vital documents in FY17 and update its FY17/18 Biennial Language Access Plan with a list of prioritized vital documents slated for translation.

Finally, four public complaints were filed against MPD in FY16. This signals ongoing challenges with quality of service provided by its frontline staff and reinforces the urgent need for agency-wide training on providing quality service and language assistance to LEP/NEP constituents.

Office of Contracting and Procurement



preparedness
1/4

OCP trained some frontline staff in FY16, but needs to institute a reliable data collection mechanism and train all public contact employees to meet preparedness requirements in FY17.

accessibility
2/5

OCP included multilingual prompts on its sign-in sheets and has a 'language support' section on its website, but reported no vital document translations or outreach in FY16.

quality
2/3

No complaints were filed against the agency and no tests were conducted in FY16.



FY15 Score
5/12



FY16 Encounters
9

FY15 Encounters: No data **FY14 Score:** 8/12

FY16 Top Languages Encountered:

Spanish

The Office of Contracting and Procurement (OCP) made a number of promising efforts in the second quarter of FY16 to address longstanding gaps in language access compliance, but unfortunately did not sustain efforts through the end of the fiscal year.

In FY16, OCP successfully trained public contact staff at the central office on language access compliance requirements and identified specific ways that the agency could enhance access for the District's LEP/NEP business community. The agency also updated sign-in sheets in public-facing locations to include multilingual prompts for identifying language preference and prioritized vital documents for translation.

While these were promising achievements, the agency failed to meet basic reporting and planning requirements in FY16 and did not report any data on encounters with LEP/NEP customers. There is also no evidence that the agency took steps to translate vital documents, conduct outreach, or expand training to additional frontline staff and agency-based contracting staff. According to data collected by OHR, OCP does encounter LEP/NEP customers and used telephonic interpretation services for 9 interactions with Spanish-speaking customers in FY16. While OCP does not yet have substantial interface with LEP/NEP customers, meeting the Language Access Act-mandated requirements will ensure that the agency is accessible to the LEP/NEP individuals interested in participating in business opportunities with District government.

As noted in the agency's FY15 compliance assessment, OHR urges OCP to take immediate steps to bring the agency into greater compliance by: a) developing its FY17/18 Biennial Language Access Plan (BLAP), b) translating vital documents prioritized in the agency's FY15/16 BLAP; b) instituting a reliable data collection mechanism; and c) training all public contact staff in FY17. OCP needs to make significant improvements in language access implementation in FY17.

Office of Planning



preparedness
1/4

OP did not meet reporting requirements or train staff on language access compliance in FY16.

accessibility
2/5

OP did not report outreach activities intended to engage LEP/NEP communities or translate documents in FY16.

quality
2/3

One complaint was filed against OP in FY16. No field testing was conducted at this agency.



FY15 Score
11/12



FY16 Encounters
1

FY15 Encounters: 17

FY16 Top Languages Encountered:

Spanish

OHR recognizes the Office of Planning (OP) for meeting planning requirements of the Language Access Act and developing thoughtful Biennial Language Access Plans (BLAPs) for both the FY15/16 and FY17/18 two-year planning periods.

While OP developed thoughtful goals in FY16 to better meet training, data collection, outreach, and vital document translation requirements, the agency did not report on encounters with LEP/NEP customers or actions taken by the agency to meet these requirements. Based on language line usage data OHR gathered through the citywide telephonic interpretation provider, OP had one encounter with a Spanish-speaking client in FY16. Given this low number of encounters and the lack of outreach reported in FY16, OHR urges OP once again to develop a comprehensive, agency-wide strategy for culturally and linguistically targeted public engagement to ensure that its services and activities allow for participation from LEP/NEP communities.

As indicated in OHR's feedback to OP's FY17/18 BLAP, the agency should take immediate steps in FY17 to provide language access compliance training to all frontline staff, pilot specific community engagement strategies to establish contact and work on accessibility to LEP/NEP communities, and prioritize specific vital documents to be translated and centralized electronically under the 'language support' pages of its website. Finally, OHR urges OP to adopt an updated language access policy, expand language access compliance training to grantees and contractors, and update contractual agreements to explicitly include language access compliance requirements.

Office of Tax and Revenue



preparedness
3/4

OTR reported data on LEP/NEP encounters but needs to take immediate action to ensure that all frontline employees receive language access compliance training.

accessibility
3/5

OTR produced 4 translated vital documents and conducted outreach in FY16. Translated documents are available on OTR's website but need to be centralized under a language support section for easier access.

quality
3/3

No complaints were filed in FY16 and no field tests were conducted at this agency. OTR improved language access compliance in FY16.



FY15 Score
5/12



FY16 Encounters
5,151

FY15 Encounters: 3,062

FY16 Top Languages Encountered:

Spanish, Amharic, Mandarin, Vietnamese, Korean, Persian

OHR commends the Office of Tax and Revenue (OTR) for demonstrating renewed commitment to language access compliance in FY16 and for taking steps to address critical gaps in preparedness and accessibility measures.

In FY16, OTR translated 4 documents into Spanish, reported comprehensive data on encounters with LEP/NEP customers, hired a bilingual employee to serve in a frontline position, and created bilingual outreach material to support its community engagement activities. OHR also acknowledges OTR's efforts to better meet reporting requirements, improve signage in public-facing locations, and equip frontline staff with the tools they need to provide language assistance to their customers.

While these steps have improved the agency's preparedness and accessibility, OTR needs to accelerate efforts to meet the full scope of language access implementation requirements.

OHR urges OTR to take immediate steps in FY16 to ensure that all frontline staff attend a language access compliance training. As stated in OHR's feedback on OTR's FY17/18 Biennial Language Access Plan as well as in the agency's scorecard for FY15 compliance, translation of vital documents into additional languages and the adoption of a signed Language Access Policy are key compliance requirements equally needing immediate attention.

Office of the People's Counsel



preparedness
4/4

OPC has met all preparedness requirements by collecting comprehensive data on LEP/NEP encounters and consistently delivering training to all frontline staff.

accessibility
5/5

OPC produced 55 translated documents in FY16 and participated in 38 outreach events, many of which target LEP/NEP populations.

quality
3/3

No complaints were filed against OPC in FY16 and no testing was conducted at this agency.



FY15 Score
12/12



FY16 Encounters
4,704

FY16 Top Languages Encountered:

Spanish, Amharic, Chinese, French, Vietnamese, Tigrinya, Korean, and Bengali

The Office of the People's Counsel (OPC) continues to go above and beyond to meet all language access compliance requirements and model effective practices for creating a culture of linguistically and culturally accessible service delivery.

OPC satisfied all compliance requirements in FY16 by a) reporting comprehensive data on encounters with LEP/NEP customers, b) generating 55 translated vital documents in 6 languages, c) ensuring that all frontline staff/new hires receive language access compliance training; and d) participating in 39 community events, most of which targeted the District's LEP/NEP communities.

In FY16, OPC provided Spanish language instruction for frontline staff interested in learning Spanish. OHR congratulates OPC on taking this proactive step, which demonstrates the agency's commitment to not only meet compliance requirements of the Language Access Act, but also build the staff's cultural and linguistic competence. OHR also commends OPC's efforts to attract bilingual staff by updating relevant position descriptions to explicitly encourage bilingual individuals to apply.

Finally OHR encourages OPC to continue efforts to institute multilingual sign-in sheets and centralize new translated documents online in the language support section.

Office of the State Superintendent of Education



preparedness
2/4

OSSE reported FY16 encounters but did not fulfill training requirements. Agency needs to improve data collection mechanism in FY17.

accessibility
4/5

OSSE needs to centralize translated vital documents under a "language support" feature on its website to improve accessibility.

quality
2/5

No public complaints were filed against OSSE in FY16. Only 3 out of 8 field tests conducted at OSSE received language assistance.



Telephone Tests
3 out of 8 tests provided the requested service, information, or appropriate resources.



FY16 Encounters
13,576

FY16 Top Languages Encountered:

Spanish, Tigrinya, Amharic, French, German, Mandarin, Twi, Russian, Portuguese, Italian

OHR acknowledges the Office of the State Superintendent of Education (OSSE)'s renewed commitment to language access in FY16 and applauds the creation of a dedicated Language Access Coordinator position within the Division of the Chief of Staff.

OHR credits OSSE for translating 28 vital documents into up to six languages, conducting extensive outreach to LEP/NEP families, and reporting data on encounters in FY16. While OSSE met important milestones with these achievements, the agency has yet to address critical compliance requirements in FY17. Training frontline, senior, and grantee staff on language access compliance, improving data collection strategies, and establishing an inter-divisional Language Access Team, are all vital preparedness requirements which remained unaddressed in FY16. An equally pressing outstanding compliance requirement is the creation of a language support feature on the OSSE website to centralize all translated vital documents.

Results from FY16 field testing conducted at OSSE's Main Office and its DC Strong Start program indicated that only 3 out of 8 testers received language assistance, while 5 of the calls were hung up on by OSSE employees. These results reinforce the urgent need for agency-wide training and accelerated efforts to equip all employees and grantees with the tools they need to provide access and quality service to LEP/NEP families.

With increased staff capacity dedicated to language access compliance and the comprehensive Biennial Language Access Plan OSSE developed to guide its work in FY17/18, OHR expects the agency will take immediate corrective measures in FY17 to address ongoing compliance gaps and to implement the full scope of requirements mandated by the Language Access Act.

Office of the Tenant Advocate



preparedness
3/4

OTA needs to improve data collection strategies and take immediate steps to ensure all frontline staff receive language access compliance training.

accessibility
1/5

OTA did not translate any vital documents or conduct targeted outreach to LEP/NEP residents in FY16.

quality
4/5

No complaints were filed against the agency in FY16, and all telephone field tests resulted in language access.



FY16 Encounters
214



Telephone Tests
4 out of 4 telephone tests provided the requested service, information, or appropriate resources.

FY15 Score: 9/14

FY16 Top Languages Encountered:
Spanish

OHR commends the Office of Tenant Advocate (OTA) for successfully providing interpretation for all four field test calls made to the agency. OHR also credits OTA for reporting LEP/NEP encounters in FY16 and for hiring a bilingual receptionist to build the agency's cultural and linguistic capacity.

In FY17, OHR urges OTA to take swift action to address longstanding gaps in the implementation of fundamental language access compliance requirements. As outlined in OHR's feedback on OTA's FY17/18 Biennial Language Access Plan, the agency needs to set concrete dates in the second quarter of FY17 for training all public contact staff on language access compliance. Without this preparedness measure, OTA frontline staff will remain unequipped to effectively engage and serve LEP/NEP customers or fulfill data tracking and reporting requirements.

While OTA did provide data on FY16 encounters with LEP/NEP customers pulling from usage of bilingual staff, in-person interpreters, and Language Line services, the fact that the encounters were exclusively with Spanish-speaking customers suggests that either the agency still does not have a comprehensive data collection mechanism in place, or that it is not reaching the full diversity of LEP/NEP tenants who require the agency's services.

OTA therefore needs to improve accessibility of its services by translating outreach-related vital documents into high prevalence languages for the District, as well as develop and execute a specific outreach plan that can help ensure that LEP/NEP residents participate in OTA's events and services.

Office of Unified Communications



preparedness
4/4

OUC reported comprehensive data on encounters with LEP/NEP customers and provided language access compliance training to frontline staff.

accessibility
5/5

OUC reported it did not generate new vital documents in FY16. The agency conducted outreach at numerous community events.

quality
3/3

OUC provided language assistance to all 7 field testers who called the agency in FY16. No complaints were filed against OUC in FY16.



Telephone Tests

7 out of 7 telephone tests provided the requested service, information, or appropriate resources.



FY16 Encounters
7,352

FY15 Score: 12/12

FY16 Top Languages Encountered:

Spanish, Amharic, Mandarin, Korean, Vietnamese, French, Arabic, Portuguese, Urdu, Thai

OHR applauds the Office of Unified Communications (OUC) for continuing to fully meeting language access compliance requirements in FY16 and for receiving a perfect score in FY16 field testing results, indicating that language access was provided for all seven calls made to the OUC 311 Center.

OUC's quarterly reports indicate that all of the agency's vital documents have already been translated and that no new vital documents were generated in FY16. The agency trained frontline staff on language access compliance using an online training module and in-person training led by in-house instructors who participated in OHR's train-the-trainer sessions. The agency also conducted extensive outreach throughout the District in FY16 and participated in several community events specifically targeting LEP/NEP residents.

OHR commends OUC for strategic goals outlined in its FY17/18 Biennial Language Access Plan and encourages the agency to sustain momentum in the coming year to achieve them. Implementation of OUC's plans to expand recruitment of bilingual staff and deepen its reach into diverse LEP/NEP communities by collaborating with the Mayor's Constituency Offices, as well as its plan to identify division-specific Language Access Liaisons, will further enhance the agency's services to LEP/NEP customers.

Compliance Scorecards: New Major Public Contact Agencies

Data underlying the agency scores can be found beginning on page 66.



Department of General Services



preparedness
1/4

DGS needs to take immediate steps to improve preparedness by training staff and creating a comprehensive mechanism to collect data on LEP/NEP encounters.

accessibility
1/5

DGS needs to translate prioritized vital documents, provide a language support section on its website, and conduct tailored outreach designed to engage LEP/NEP populations.

quality
2/3

No complaints were filed against DGS in FY16, and the agency was not tested.



FY15 Score
N/A



FY16 Encounters
N/A

FY16 Top Languages Encountered:

N/A

The Department of General Services (DGS) is one of five agencies recently designated as covered entities with major public contact as a result of 2014 changes to the Language Access Act regulations. FY16 is the first year when DGS has been required to fulfill reporting requirements and provide data on encounters with LEP/NEP customers or on language access implementation efforts within the agency.

While DGS has not provided data on LEP/NEP encounters, OHR acknowledges the Language Access Team's efforts to develop a comprehensive FY17/18 Biennial Language Access Plan (BLAP) and take incremental steps towards fulfilling reporting, training, signage, and data collection requirements. OHR also commends DGS for its high level of bilingual staff recruitment, which will greatly assist in navigating cultural and language barriers to LEP/NEP customer service.

As indicated in OHR's feedback on DGS' BLAP, the agency should take immediate steps to train frontline staff, translate the first round of prioritized vital documents, meet data collection requirements, and report on LEP/NEP encounters. OHR equally urges DGS to develop a plan for ensuring that grantees and contractors also comply with Language Access requirements and receive compliance training. Because DC residents will interact with DGS primarily through building signage and security guards, it is essential that a plan be in place for training security staff and putting in place signed agreements with contractors.

Department of Health Care Finance



preparedness
3/4

DHCF reported encounters with LEP/NEP customers, worked on improvements in data collection, and provided compliance training for all staff.

accessibility
5/5

DHCF produced 16 translated documents into Spanish and Amharic, uploaded translated documents on its website, and promoted services through diverse media outlets.

quality
3/3

No complaints were filed against DHCF in FY16, and the agency was not tested.



FY15 Score
N/A



FY16 Encounters
N/A

FY16 Top Languages Encountered:

Spanish, Amharic, Mandarin, Cantonese, French, Bulgarian, Bengali, Vietnamese

The Department of Health Care Finance (DHCF) is one of five agencies recently designated as covered entities with major public contact as a result of 2014 changes to the Language Access Act regulations. FY16 is the first year DHCF has been required to fulfill reporting requirements and provide data on encounters with LEP/NEP customers and on language access implementation activities.

OHR credits the DHCF Language Access Workgroup for developing a thoughtful and robust FY17/18 Biennial Language Access Plan (BLAP) tailored to address the unique structure and needs of the agency. OHR also applauds the agency for significant compliance achievements in FY16. DHCF coordinated a series of 4 trainings on language access compliance requirements and resources for all 178 employees; worked closely with DHS and other partner agencies on laying the groundwork for reporting encounters through a shared customer tracking system; translated 16 vital documents, and engaged the public through diverse media outlets including Channels CNNE-TV, GALA-TV, DSE-TV, UVSO-TV, HSTE-TV, and El Tiempo to promote its programs and services.

OHR is pleased with DHCF's proactive efforts in FY16 and encourages the agency to fulfill reporting requirements more diligently in FY17. OHR also recommends that DHCF create a "language support" section on its website and organize translated documents by language so that they can be more easily identified by LEP/NEP readers.

Department of Youth Rehabilitation Services



preparedness
4/4

DYRS reported LEP/NEP encounters and trained over 128 frontline staff and managers.

accessibility
4/5

DYRS translated 9 vital documents into 3 languages, provided a language support section on its website, and conducted tailored outreach to engage LEP/NEP populations.

quality
2/3

One public complaint was filed against DYRS in FY16. Agency was not tested in FY16.



FY15 Score
N/A



FY16 Encounters
150

FY16 Top Languages Encountered:

Spanish, Tigrinya, Arabic, Romanian

The Department of Youth Rehabilitation Services is one of five agencies newly designated as covered entities with major public contact as a result of FY15 changes to the Language Access Act regulations. DYRS was required to fulfill the Act's reporting requirements for the first time in FY16. OHR is pleased that the agency has successfully provided data on encounters with LEP/NEP customers and compliance steps the agency has taken over the course of the year.

OHR applauds DYRS' accomplishments in FY16 and efforts to fulfill fundamental language access preparedness requirements. DYRS provided 4 language access compliance trainings for over 128 managers and frontline staff, developed and adopted a language access policy, and translated 9 vital documents into the 3 languages most encountered by the agency. DYRS also ensured that translated documents are accessible online.

OHR credits DYRS for these achievements and, as stated in feedback on the agency's FY17/18 Biennial Language Access Plan, encourages the agency to develop a strategy to meet outreach and LEP/NEP community engagement requirements. While translated documents are uploaded online, OHR recommends that they be centralized and organized by language under a language support section on the website where they can be more easily accessed by LEP/NEP residents as well as DYRS staff.

Office of Administrative Hearings



preparedness
3/4

OAH reported data on encounters with LEP/NEP customers and fully met training and reporting requirements. OAH also hired two bilingual employees.

accessibility
5/5

OAH translated 6 vital documents into Spanish and Amharic, included multilingual taglines in all orders sent to litigants, and created a 'language support' section on its website.

quality
3/3

No complaints were filed against OAH in FY16, and the agency was not tested.



FY15 Score
N/A



FY16 Encounters
302

FY16 Top Languages Encountered:

Spanish and Amharic

The Office of Administrative Hearings (OAH) is one of five agencies recently designated as covered entities with major public contact as a result of 2014 changes to the Language Access Act regulations. OHR applauds OAH for taking proactive steps since this designation to meet compliance requirements under the Act and for its commitment to expanding access and support to LEP/NEP litigants.

In FY16, OAH hired two new bilingual employees who speak Spanish and Amharic and added a bilingual employee to staff its Resource Center. OAH also achieved 100% training of agency staff in FY15 and followed up with training for new hires in FY16. Together, these actions strengthen the agency's preparedness and capacity to serve LEP/NEP customers. OAH also translated 6 vital documents into Spanish and Amharic in FY16 and included multilingual taglines in all orders it issues to litigants explaining how they can obtain a translated order.

While OAH reported data on encounters with LEP/NEP customers and used multiple data sources to generate the total number of encounters, OHR advises the agency to improve its data collection mechanism in FY17 so as to ensure that every daily encounter – whether in person, over the phone, or via use of a waiver – is being properly tracked and centralized for quarterly reporting. OHR credits OAH for adding a 'language support' section on its website and encourages the agency to make translated documents available under each language for easier online access.

Office of Attorney General's Child Support Services Division



preparedness
4/4

OAG-CSSD created a robust system for data collection, trained employees on language access compliance, and equipped them with critical tools for providing language assistance to LEP/NEP customers.

accessibility
5/5

CSSD translated vital documents into Spanish and Amharic, revamped signage in public-facing locations, and conducted targeted outreach through its mobile unit.

quality
3/3

No complaints were filed against OAH in FY16, and the agency was not tested



FY15 Score
N/A



FY16 Encounters
1,451

FY16 Top Languages Encountered:

Spanish, Amharic, French, Tigrinya, German, Arabic, Vietnamese, Korean, Hindi, Dutch

The Office of Attorney General's Child Support Services Division (CSSD) is one of five agencies recently designated as covered entities with major public contact as a result of 2014 changes to the Language Access Act regulations. OHR congratulates CSSD on its impressive achievements in language access compliance since this designation and exemplary efforts to create both the culture and the systems needed to fully meet the requirements of the Act.

To lay the groundwork needed for collecting comprehensive data on encounters, CSSD adopted a new tracking form, incorporated a language field with a drop down menu in its case management system, and trained staff on how to utilize these systems to document daily interactions with LEP/NEP customers. CSSD's case management screen now displays the preferred language of the LEP/NEP customer across the top of the screen, and Language Line Quick Access Cards have been posted at individual employee desks and made available in the agency's portal.

Additionally in FY16, CSSD a) provided 11 language access compliance trainings and an online refresher module to its staff, b) improved signage by placing multilingual language access posters in interview rooms and "I Speak" cards in public facing locations, c) translated 13 case-specific documents and 3 vital documents into Spanish and Amharic, and d) conducted targeted outreach at events and locations in primarily Latino communities.

OHR commends CSSD for an impeccable performance in language access implementation in FY16. In FY17, OHR encourages the agency to expand translation and outreach to additional languages and communities encountered by the agency, improve accessibility of its website, and take steps to create a 'language support' section where all public-facing translated documents can be electronically centralized.

Compliance Details

Agencies' scores are based on questions related to compliance with the Language Access Act. A 'X' indicates successful completion of the requirement. 'N/A' is where a particular question does not apply to the specific agency for FY16.

AGENCY NAME	ABRA	CFSA	DBH	DCRA	DOC	DOES	DOEE	DGS	DOH
PREPAREDNESS									
P1. Agency provided data on FY16 encounters	X	X	X	X	X	X	X		X
P2. Method for collecting data was comprehensive.	X	X	X	X		X	X		
P3. Agency staff were trained in FY16.		X	X	X			X		
P4. Agency communicated effectively.	X	X	X	X	X	X	X	X	
PREPAREDNESS SCORE	3	4	4	4	2	3	4	1	1
ACCESSIBILITY									
A5. Direct requests for interpretation and/or translation services were met.	X	X	X	X	X	X	X	X	X
A6. Vital documents were translated and/or updated in FY16.	X	X	X	X	X	X	X		
A7. Translated vital documents accessible on agency website.		X	X		X	X	X		
A8. Vital documents translated in FY16 reflect the needs of LEP/NEP.		X	X		X	X	X		
A9. Efforts were made to reach out to LEP/NEP communities in FY16.		X	X	X	X		X		
ACCESSIBILITY SCORE	2	5	5	3	5	4	5	1	1
QUALITY									
Q10. No complaints were filed against the agency in FY16.	X	X	X	X	X		X	X	
Q11. Agency was not found in non-compliance in FY16.	X	X	X	X	X	X	X	X	
Q12. No tester was turned away during tests.	N/A		X		N/A		N/A	N/A	
Q13. All testers who accessed employee or interpretation received requested information or services.	N/A	X	X		N/A		N/A	N/A	
Q14. OHR has observed significant improvement in LA implementation in FY16.		X	X				X		
QUALITY SCORE	2	4	5	2	2	1	3	2	0
TOTAL AGENCY SCORE	7	13	14	9	9	8	12	4	2
TOTAL POSSIBLE SCORE	12	14	14	14	12	14	12	12	14

AGENCY NAME	DHCF	DHCD	DCHR	DHS	DMV	DPR	DPW	DSLBD	DDS	DDOT
PREPAREDNESS										
P1. Agency provided data on FY16 encounters	X		X	X	X	X	X	X	X	X
P2. Method for collecting data was comprehensive.	X		X	X		X		X	X	X
P3. Agency staff were trained in FY16.	X		X	X	X	X	X			X
P4. Agency communicated effectively.			X	X		X	X		X	X
PREPAREDNESS SCORE	3	0	4	4	2	4	3	2	3	4
ACCESSIBILITY										
A5. Direct requests for interpretation and/or translation services were met.	X	X	X		X	X	X	X	X	X
A6. Vital documents were translated and/or updated in FY16.	X		X	X	X	X	X		X	X
A7. Translated vital documents accessible on agency website.	X		X		X	X	X	X		
A8. Vital documents translated in FY16 reflect the needs of LEP/NEP.	X		X	X		X	X		X	X
A9. Efforts were made to reach out to LEP/NEP communities in FY16.	X		X	X	X	X	X		X	
ACCESSIBILITY SCORE	5	1	5	3	4	5	5	2	4	3
QUALITY										
Q10. No complaints were filed against the agency in FY16.	X	X	X			X	X	X	X	X
Q11. Agency was not found in non-compliance in FY16.	X	X	X			X	X	X	X	X
Q12. No tester was turned away during tests.	N/A	X	N/A		X			N/A		N/A
Q13. All testers who accessed employee or interpretation received requested information or services.	N/A	X	N/A	X	X			N/A	X	N/A
Q14. OHR has observed significant improvement in LA implementation in FY16.	X		X					X	X	X
QUALITY SCORE	3	4	3	2	2	2	2	2	4	3
TOTAL AGENCY SCORE	11	5	12	8	8	10	9	6	11	7
TOTAL POSSIBLE SCORE	12	12	12	14	14	14	14	12	14	14

Compliance Details

Agencies' scores are based on questions related to compliance with the Language Access Act. A 'P' indicates successful completion of the requirement. 'N/A' is where a particular question does not apply to the specific agency for FY16.

AGENCY NAME	DCHA	DYRS	DCLB	DCOZ	DCOA	DCPL	DCPS	FEMS	HSEMA
PREPAREDNESS									
P1. Agency provided data on FY16 encounters.	X	X	X	X	X	X	X	X	X
P2. Method for collecting data was comprehensive.		X		X		X	X		
P3. Agency staff were trained in FY16.		X		X	X	X			X
P4. Agency communicated effectively.		X		X		X	X	X	X
PREPAREDNESS SCORE	1	4	1	4	2	4	3	2	3
ACCESSIBILITY									
A5. Direct requests for interpretation and/or translation services were met.	X	X	X	X	X	X		X	X
A6. Vital documents were translated and/or updated in FY16.		X	X	X	X	X	X		
A7. Translated vital documents accessible on agency website.	X	X		X		X	X		X
A8. Vital documents translated in FY16 reflect the needs of LEP/NEP.		X	X	X	X	X	X		
A9. Efforts were made to reach out to LEP/NEP communities in FY16.	X			X	X	X	X		X
ACCESSIBILITY SCORE	3	4	3	5	4	5	4	1	3
QUALITY									
Q10. No complaints were filed against the agency in FY16.	X		X		X	X		X	X
Q11. Agency was not found in non-compliance in FY16.	X	X	X	X	X	X	X	X	X
Q12. No tester was turned away during tests.		N/A	N/A	N/A	N/A	N/A			N/A
Q13. All testers who accessed employee or interpretation received requested information or services.	X	N/A	N/A	N/A	N/A	N/A			N/A
Q14. OHR has observed significant improvement in LA implementation in FY16.		X		X		X		X	
QUALITY SCORE	3	2	2	2	2	3	1	3	2
TOTAL AGENCY SCORE	7	10	6	11	8	12	8	6	8
TOTAL POSSIBLE SCORE	14	12	14	12	12	12	14	12	12

AGENCY NAME	MPD	OAH	OAG	OCP	OP	OTR	OPC	OSSE	OTA	OUC
PREPAREDNESS										
P1. Agency provided data on FY16 encounters	X	X	X			X	X	X	X	X
P2. Method for collecting data was comprehensive.	X		X			X	X		X	X
P3. Agency staff were trained in FY16.		X	X	X			X			X
P4. Agency communicated effectively.	X	X	X		X	X	X	X	X	X
PREPAREDNESS SCORE	3	3	4	1	1	3	4	2	3	4
ACCESSIBILITY										
A5. Direct requests for interpretation and/or translation services were met.	X	X	X	X	X		X	X	X	X
A6. Vital documents were translated and/or updated in FY16.		X	X	X		X	X	X		X
A7. Translated vital documents accessible on agency website.	X	X	X	X	X	X	X			X
A8. Vital documents translated in FY16 reflect the needs of LEP/NEP.		X	X				X	X		X
A9. Efforts were made to reach out to LEP/NEP communities in FY16.	X	X	X			X	X	X		X
ACCESSIBILITY SCORE	3	5	5	3	2	3	5	4	1	5
QUALITY										
Q10. No complaints were filed against the agency in FY16.		X	X	X		X	X	X	X	X
Q11. Agency was not found in non-compliance in FY16.		X	X	X	X	X	X	X	X	X
Q12. No tester was turned away during tests.	X	N/A	N/A	N/A	N/A	N/A	N/A		X	X
Q13. All testers who accessed employee or interpretation received requested information or services.	X	N/A	N/A	N/A	N/A	N/A	N/A		X	X
Q14. OHR has observed significant improvement in LA implementation in FY16.	X	X	X		X	X	X			X
QUALITY SCORE	3	3	3	2	2	3	3	2	4	5
TOTAL AGENCY SCORE	9	11	12	6	5	10	12	8	8	14
TOTAL POSSIBLE SCORE	14	12	12	12	12	12	12	14	14	14

ohr.dc.gov

facebook.com/dcohr

twitter.com/dchumanrights

instagram.com/dchumanrights

Cover Art: DC Mural by Aniekan Udofia titled “Building Together”