

District of Columbia **OFFICE OF HUMAN RIGHTS**

**FY17 Language Access Program
Annual Compliance Review**

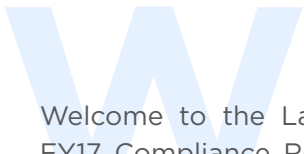
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Note from the LA Director



Welcome to the Language Access in the District: FY17 Compliance Report, OHR's annual publication assessing the District's efforts to fulfill the mandate of the D.C. Language Access Act of 2004. Given the troubling national landscape with regard to immigrants in the U.S., Mayor Bowser's Administration stands firmly as a jurisdiction that welcomes immigrants, and recognizes the vital contributions our foreign-born residents and businesses make to the social and economic vitality of our city.

As the District works to actualize DC Values and Mayor Bowser's commitment to supporting the full civic, social and economic participation of all residents, we are very pleased to report that agencies are increasingly providing linguistically accessible services through interpretation services, translated documents, outreach, and enhanced multilingual signage. In FY17, 38 District agencies collectively reported over 204,783 encounters with limited-English proficient individuals who spoke 73 different languages. Frontline employees at these agencies made 71,859 calls to access a telephonic interpreter, utilized in-person interpretation services in 40,175 interactions with a limited-English proficient customer, and translated roughly 2,000 vital documents into Spanish, Amharic, French, Chinese, and 16 other languages spoken by their customers.

While there is certainly more work to do to fully actualize the District's values of inclusion and access, it is clear that more and more agencies are putting in place the resources, systems and processes needed to effectively serve a linguistically diverse community. For instance, field tests conducted at 17 agencies in 2017 showed that 59% of tested agencies provided interpretation services at a higher rate than they did in 2016. Fire and EMS Management Services

and the Department of Health took drastic measures in FY17 to improve compliance, as a result of which the District is now better equipped to provide critical health, safety and emergency services to limited-English proficient individuals. As you will read in this report, the Office of the State Superintendent for Education, the Metropolitan Police Department, and the Department of Employment Services already boast incredible outcomes within a year of appointing a full time Language Access Coordinator to steward and deepen their language access compliance efforts.

This report further highlights the work of OHR's Language Access Program, summarizes the compliance profile of 23 agencies with newly-appointed Language Access Points of Contact, and contains individual scorecards for 38 agencies with major public contact. In addition to showing the number of limited English proficient customers served, and the top languages encountered by the agency, each scorecard offers an assessment of how well the agency met language access compliance requirements over the course of the year.

As the District celebrates the 14th anniversary of the DC Language Access Act, the Language Access Program looks forward to working with agencies, Language Access Coordinators, Points of Contacts, and community partners to push full steam ahead toward fulfilling the District's promise of equity and inclusion.

Winta Teferi
Language Access Director

2016 Demographic Profile of the District's Foreign Born and LEP/NEP Populations

13.3% or **90,631** District residents are **foreign born**



13,937 or **15.4%** were born in **Africa**



17,508 or **19.3%** were born in **Asia**



15,479 or **17.1%** were born in **Europe**



40,863 or **45.1%** were born in **Latin America**¹



2,816 or **3.1%** were born in **Northern America** or **Oceania**



6.1% or **39,179** District residents (age 5 or older) are limited English proficient



35.2% of the District's foreign born residents (age 5 or older) are limited English proficient



43.5% of the District's foreign born residents (age 5 or older) who are noncitizens are limited English proficient



25.1% of the District's naturalized foreign born residents (age 5 or older) are limited English proficient



1.4% of the District's U.S born population (age 5 or older) is limited English proficient



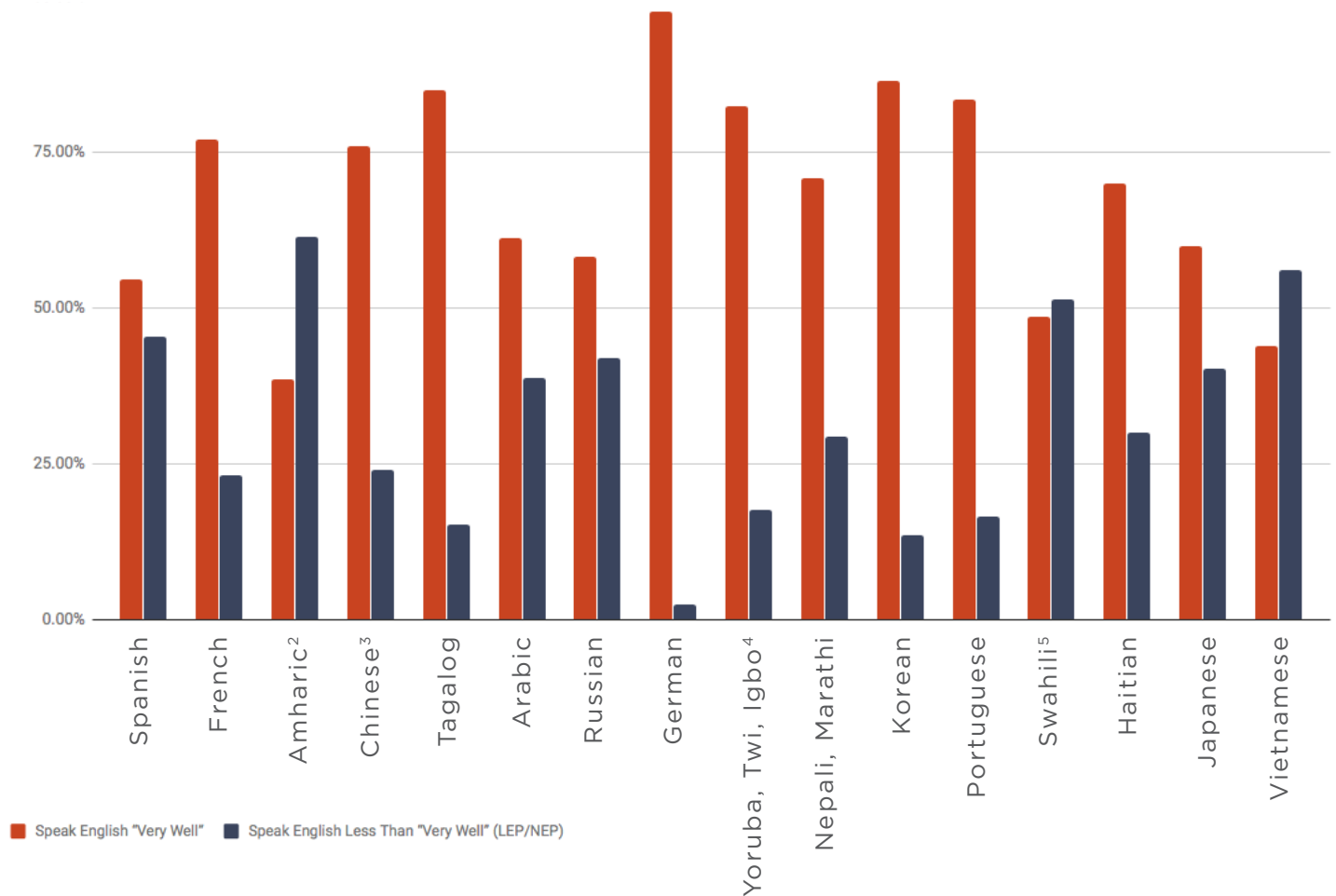
17.1% or **109,280** District residents (age 5 or older) speak a language other than English at home

Source: Migration Policy Institute tabulations of 2016 one-year estimate data from the U.S. Census Bureau's American Community Survey (ACS).

¹ Includes South America, Central America, Mexico and the Caribbean

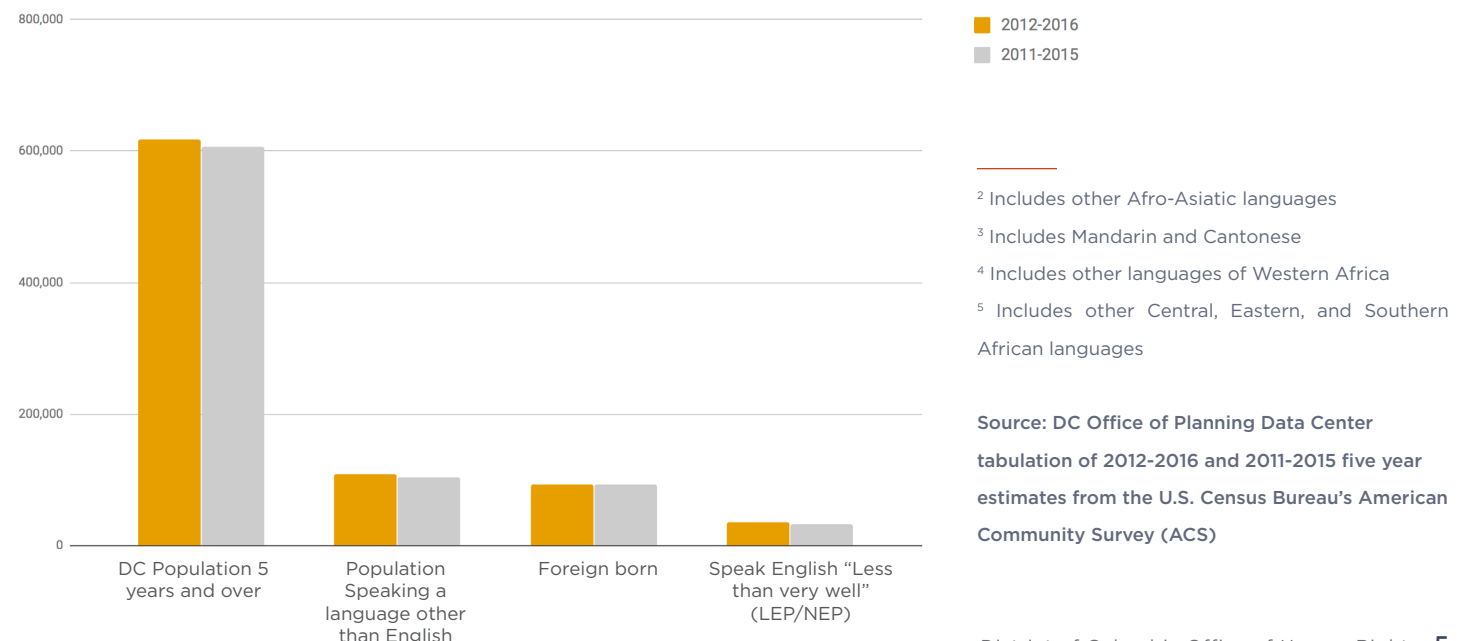
Language Spoken at Home by English Proficiency

(population age 5 or older)



Comparative Demographic Profile

Based on 5-Year Estimates:



The DC Language Access Act of 2004

The DC Language Access Act of 2004 requires all District government agencies, public-facing contractors and grantees to ensure that limited and non-English proficient (LEP/NEP) individuals access the full range of government services and receive translation and interpretation services. The Act further outlines requirements for covered entities and designates 39 agencies as covered entities with major public contact. The Language Access Program is tasked with annually monitoring and evaluating all covered entities. OHR's FY17 Annual Compliance Review provides individual scorecards for 38¹ covered entities with major public contact assessing their level of compliance and a baseline compliance profile for 23 covered entities.



Covered Entities with Major Public Contact

Designate a Language Access Coordinator;
 Collect data on the agency's interactions with LEP/NEP customers;
 Provide interpretation services;
 Provide written translations of vital documents;
 Train staff on language access compliance;
 Develop a Biennial Language Access Plan, and report implementation progress to OHR on a quarterly basis; and
 Conduct outreach to LEP/NEP communities.

Covered Entities

Designate a Language Access Point of Contact;
 Collect data on the agency's interactions with LEP/NEP customers;
 Provide interpretation services;
 Provide written translations of vital documents;
 Train staff on language access compliance; and
 Submit a yearly implementation report to OHR.

Covered Entities with Major Public Contact

Alcoholic Beverage Regulation Administration
 Child and Family Services Agency
 Department of Behavioral Health
 Department of Consumer and Regulatory Affairs
 Department of Corrections
 Department of Employment Services
 Department of Energy & Environment
 Department of General Services
 Department of Health
 Department of Health Care Finance
 Department of Housing and Community Development
 Department of Human Resources
 Department of Human Services
 Department of Motor Vehicles
 Department of Parks and Recreation
 Department of Public Works
 Department of Small and Local Business Development
 Department of Youth Rehabilitation Services
 Department on Disability Services
 District Department of Transportation
 District of Columbia Housing Authority
 District of Columbia Lottery and Charitable Games Control Board
 District of Columbia Office of Zoning
 District of Columbia Public Library
 District of Columbia Public Schools
 Fire and Emergency Medical Services Department
 Homeland Security and Emergency Management Agency
 Metropolitan Police Department
 Office of Administrative Hearings
 Office of the Attorney General – Child Support Services Division
 Office of Contracting and Procurement
 Office of Human Rights
 Office of Planning
 Office of Tax and Revenue
 Office of the People's Counsel
 Office of the State Superintendent of Education
 Office of the Tenant Advocate
 Office of Unified Communications
 Office on Aging

Covered Entities (with designated Language Access Point of Contact)

DC Board of Elections
 DC Commission on the Arts and Humanities
 DC Health Benefit Exchange Authority
 DC Office of Police Complaints
 DC State Board of Education
 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 Housing Finance Agency
 District of Columbia Retirement Board
 District of Columbia Water and Sewer Authority
 Office of Cable Television, Film, Music and Entertainment
 Office of Disability Rights
 Office of Employee Appeals
 Office of the Attorney General
 Office of the Chief Medical Examiner
 Office of the Chief Technology Officer
 Office of the Inspector General
 Office of Victim Services and Justice Grants
 Public Services Commission
 Real Property Tax Appeals Commission

¹ To avoid bias, OHR did not score itself.

² Covered entities are required to translate 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)

Language Access Program

OHR's Language Access Program is tasked with monitoring citywide compliance with the Language Access Act by providing central coordination and technical assistance to covered entities. The work of the program is organized in four areas:

ENFORCEMENT

Investigate language access complaints from individuals or organizations who believe that a covered entity has violated the Language Access Act; issue findings; and monitor implementation of corrective actions.

TECHNICAL ASSISTANCE

Provide training, tools, and guidance on effective implementation of language access compliance requirements; and support the work of Language Access Coordinators and Language Access Point of Contacts.

COMPLIANCE MONITORING

Ensure that all 38 covered entities with major public contact develop attainable two-year plans, report quarterly, and take appropriate steps to meet compliance requirements; annually assess covered entities' compliance with the Act's requirements.

COMMUNITY ENGAGEMENT

Provide 'Know Your Rights' training and other public education and engagement opportunities to ensure that LEP/NEP individuals exercise their rights under the law.



LANGUAGE ACCESS COORDINATORS: Barbara Burton (OPC), Bonnie Rock (DGS), Cecilia Arce (DCRA), Cendoro Richardson (OCP), Charles Davis (DMV), Cheryl Randall-Thomas(DOEE), Edward Giefer (OP), Elba Garcia (DCPS), Elsa Teklehymanot (OSSE), Eric Rogers(DSLBD), Eunice Spence (CFSA), Garrett King(DCOA), Gwen Washington (DCLB, Harpreet Moore (DYRS), Henry Jimenez (DOES), Imhotep Newsome (MPD), Ivan Torres (DOH), Ivy Chaine (DCPS), Jackie Richardson (ABRA), Jaime Holguin (DHS), Jay Penuel (DDS), Jean Michelle (DCPL), Jennifer Porter Gore (DCHA), Jessica Pineyro (OAH), Jonathan Ward (DBH), Karen Randolph (DDOT) , Kim McCall (HSEMA), Kim McDaniel (FEMS), Ledesma Smith-Mathis (DCHR), Leo Albornoz (DCPR), Manuel Bolanos (OTA), Mary Campbell (DBH), Nancee Lyons (DPW), Parastue Zarghami (OTR), Renee Bryant (CFSA), Robyn Wilkes (DHCD), Sarah Black (DCPL), Sherri Battle (DSLBD), Shirley Yates (OAG-CSSD), Surobhi Rooney (DHCF), Tamaret Beyene (OAH), Tamika Gittens (DOC), Trina Dutta (DHCF), Wanda Gattison (OUC), Zelalem Hill (OZ)

LANGUAGE ACCESS POINTS OF CONTACT: Brittney Jordan (DCHBX), Debra Spencer(RPTAC), Hicham Mokhtari (PSC), Jennifer Libster (DCHBX), Jessica L. Hunt (ODR), Joan M. Passerino (DCRB), Joyanna S. Smith (SBOE), Julia Irving (OIG), Kali Wasenko(CAH), Katie Schultz (DCRB), Laura De Las Casas (CIC), Lisa M. Tabron (OCME), Maisha Greene (OAG), Marcella Hicks (OCTFME), Marcia Nicholson (OFCO), Michael Rupert (OCTO), Michelle Garcia (OVSJG), Kim Davis (DCFHV), Shaun Richards (DISB), Sheila Barfield (OEA), Stephanie Banks (OPC), Sudie Johnson (DDC), Terrica Jennings (BOE), Tyneka Garrett (DFS)

OHR's mission is to eliminate linguistic barriers and ensure that all District agencies have the tools, capacity, and technical knowledge to serve linguistically diverse customers.



Program Highlights

In FY17, the Language Access Program provided compliance training and technical assistance to Language Access Coordinators (LACs) and Language Access Points of Contact (LAPOCs) to support agencies' implementation of FY17/18 Biennial Language Access Plans (BLAPs) and overall compliance with the Language Access Act.

3 covered entity orientations were held for newly designated LAPOCs to provide language access implementation guidance and annual reporting instructions.

43 language access compliance trainings were delivered directly to 1369 District employees, grantees, and contractors.

10 language access and cultural competency trainings were delivered through DCHR's Center for Learning and Development.

3 new features were added to OHR's compliance reporting tool including a new capability for tracking corrective actions, and new fields for grantee/contractor encounters with LEP/NEP customers.

3 meetings were held with the Mayor's Offices on Latino, Asian and Pacific Islander, and African Affairs to develop multilingual content and culturally appropriate design for language access signage.

45 one-on-one meetings were held with LACs and LAPOCs in which OHR addressed a wide range of reporting and compliance-related needs.

2 new tools -multilingual staff certification guide, and a grantee/contractor compliance certification template - were produced and disseminated.

6 technical assistance sessions were offered to LACs on monitoring grantee/contractor compliance, certifying bilingual staff, and other topics.



**TRAINING +
TECHNICAL ASSISTANCE**

NEW CITYWIDE CONTRACT FOR TRANSLATION AND INTERPRETATION SERVICES

OHR and the Office of Contracting and Procurement successfully awarded the Citywide Contract for Document Translation and Face-to-Face Interpretation to three contractors: Andean Consulting Solutions International, LLC (ASCI), Multicultural Community Services (MCS), and TransPerfect Translation, Inc. (TTI). The contract is intended to ensure that the District complies with the DC Language Access Act of 2004 and that agencies use qualified vendors that have demonstrated a track record of using certified linguists and a strong quality assurance plan. The contract is awarded for a period of 1 year starting February 1, 2018 through January 31, 2019. OHR thanks the Mayor's Offices on African, Asian and Pacific Islander, and Latino Affairs for participating on the review panel and for helping the District select the best suited vendors to meet the District's translation and interpretation needs.

OHR worked with community-based partners to engage diverse LEP/NEP communities and ensure that they know and exercise their right to language access services.

1806 **LEP/NEP residents were engaged** and reached through workshops, "Know Your Rights" trainings, and community events.

90 **community events and meetings** to share information on language access and distribute multilingual "Know Your Rights" and "I Speak" cards.

3500 **multilingual "I Speak" cards** were distributed to LEP/NEP individuals.

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

80 **trainings were offered to constituents**, advocates, case managers, and service providers covering language access protections that impact their clients and members.

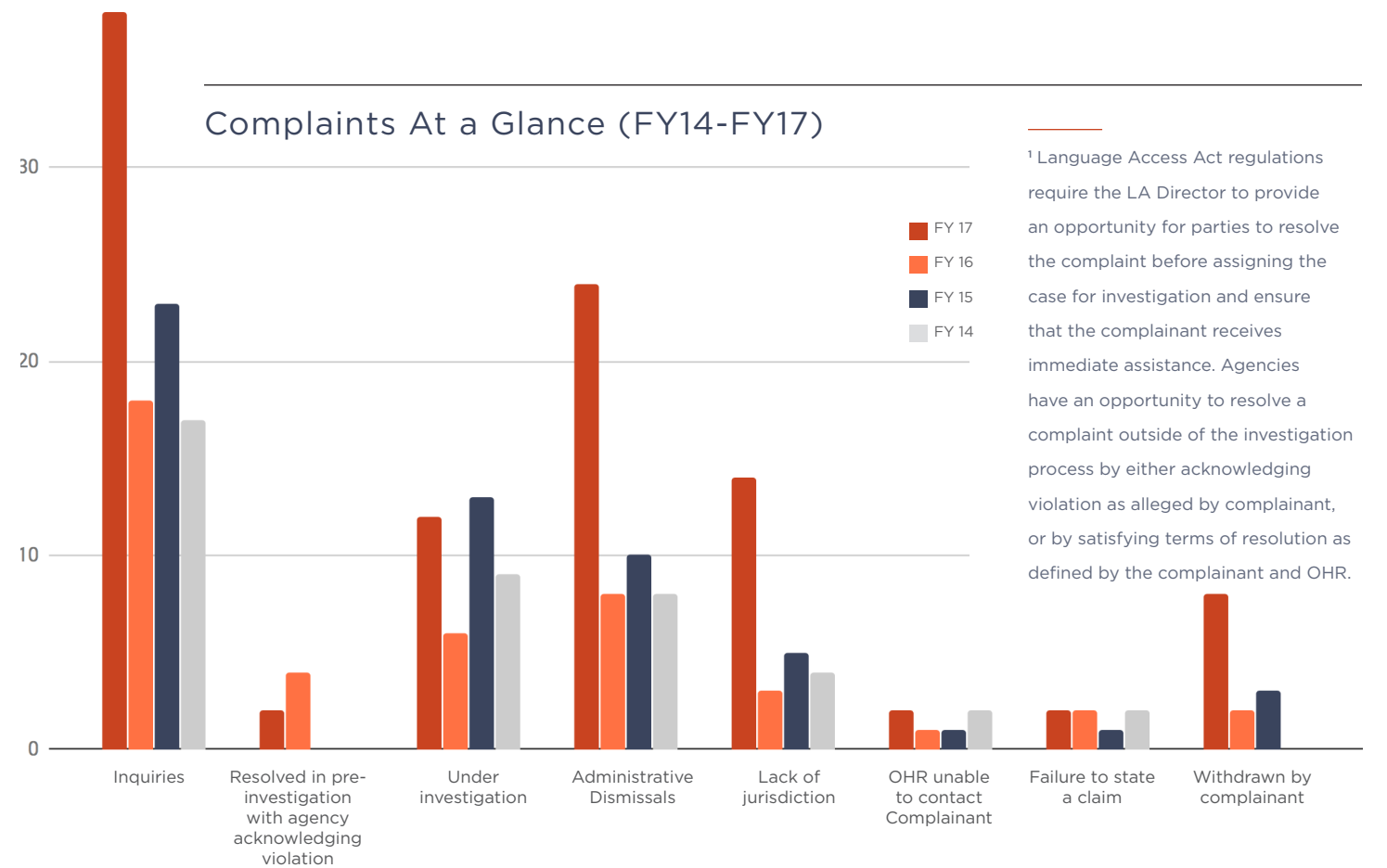
COMMUNITY ENGAGEMENT

Language Access Enforcement

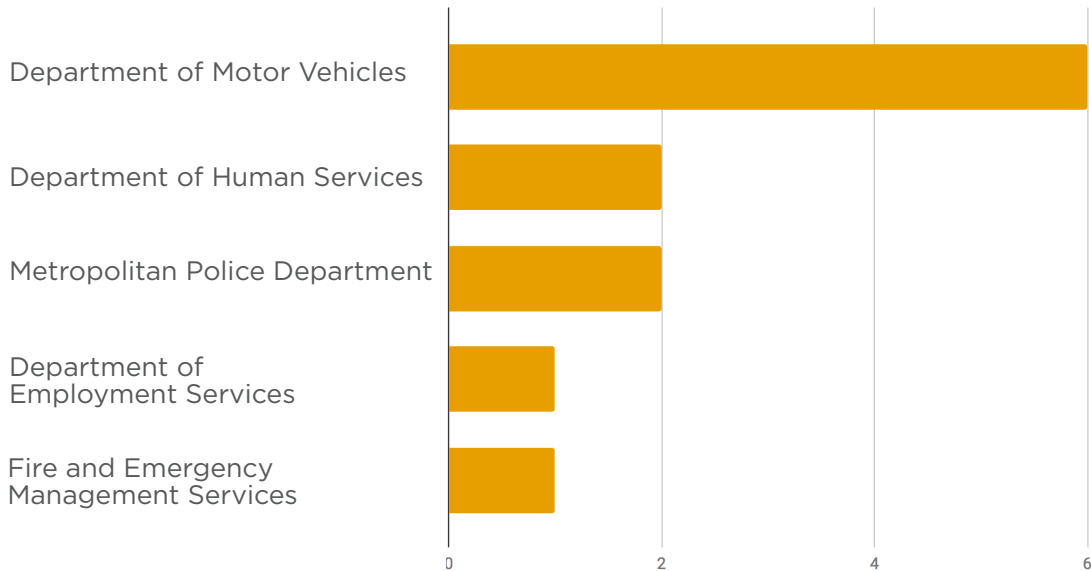
Individuals who believe their rights have been violated under the law may file a language access complaint with OHR. Once docketed cases are investigated, the OHR Director, in consultation with the LA Director, issues written findings and works with agencies found in non-compliance to identify and monitor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

- » **2** were resolved during the pre-investigation¹ process with non-compliance findings based on agencies' acknowledgement of violation as alleged by the complainant.
- » **12** were assigned for full investigation following a pre-investigation resolution process
- » **16** were administratively dismissed based on lack of jurisdiction, failure to state a claim, or lack of response from complainant.

OHR issued a total of **5 determinations** in FY17, all of which contained non-compliance findings. Agencies found to be non-compliant with the Language Access Act in FY17 include the Department of Motor Vehicles, the Department of Employment Services, the DC Public Schools, and the Office of the State Superintendent of Education.



FY17 Complaints Under Investigation² by Agency



Complaints (Inquiries) Received FY13 - FY17

Covered Entity	FY17	FY16	FY15	FY14	FY13
<i>Non-Covered Entities</i>	14	2	6	5	1
Department of Motor Vehicles	10	4	6	3	1
Department of Human Services	7	2	2	3	6
Metropolitan Police Department	2	4	1	3	
Department of Consumer Regulatory Affairs	1		3		
DC Public Schools		1	1		1
Department of Employment Services	1	1	1		
Fire and Emergency Management Services	2		1		
DC Housing Authority		1		1	
Department of Disability Services			1		1
Office of State Superintendent of Education	1		1		
DC Office of Zoning and DC Office of Planning		1			
Department of Health		1			
Department of Youth Rehabilitation Services		1			
DC Taxicab Commission (Dep. Of For-Hire Vehicles)				1	
DC Board of Elections				1	
Department of Behavioral Health					1
OAG Child Support Services Division					1
Total	38	18	23	17	11

² Includes cases undergoing OHR's intake process.

Language Access Testing

Each year, OHR contracts with the Equal Rights Center (ERC) to provide independent testing measuring the accessibility of agencies to LEP/NEP individuals. In FY17, ERC testers attempted to obtain information from frontline employees of 17 agencies while speaking exclusively in one of seven non-English languages: Amharic, Arabic, Chinese, French, Korean, Spanish, and Vietnamese. Out of a total of 237 language access field tests, 130 were conducted over the phone, and 107 were done in-person by visiting an agency. The ERC provided the scores and narrative summaries of the test results for each agency, which OHR has incorporated into the agency compliance scorecards under the 'Quality' measure. The ERC also provided an analysis of all data collected from FY17 and FY16 tests to offer comparative data on overall performance.

SUMMARY OF FINDINGS:

- » **59%** of tested agencies scored higher in FY17 than in FY16.
- » Agencies provided interpretation at a **higher rate on in-person tests (86%)** than on telephone tests **(57%)**
- » **22%** of tested locations displayed language access signage that was visible to all testers, **56%** were visible to some testers, and **22%** were visible to none of the testers.
- » Testers received language assistance in **57%** of the telephone tests as compared to **43%** in FY16 and **45%** in FY15.
- » Testers received language assistance in **86%** of in person tests, as compared to **92%** in FY16, and **88%** in FY15.
- » Testers received language assistance through a telephonic interpreter in **58%** of tests.
- » Testers received language assistance from bilingual employees in **11%** of FY17 tests as compared to **10%** in FY16 and **14%** in FY15.

**59% of agencies scored higher in FY17
than they did in FY16.**

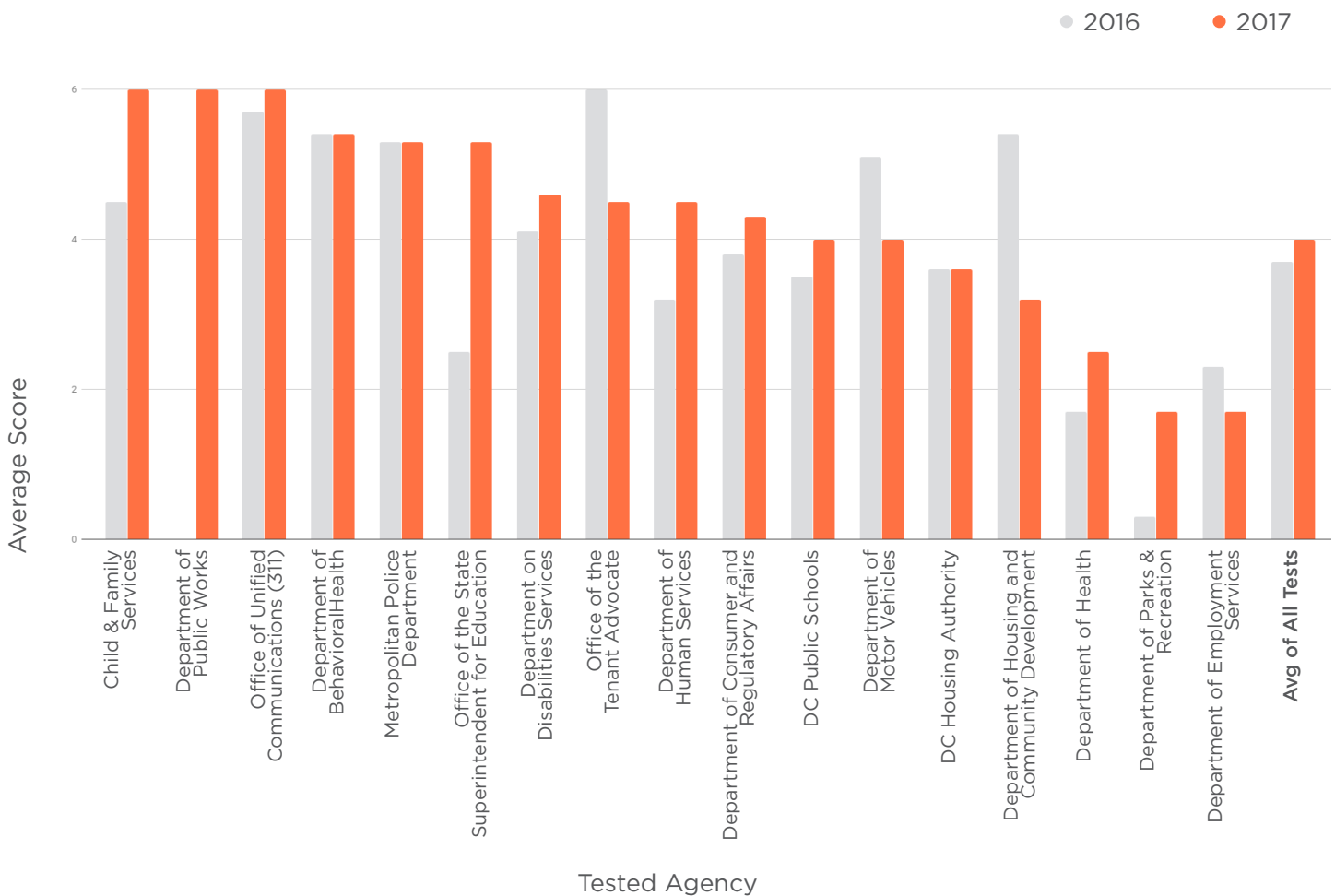




Agency Score Improvement Distribution

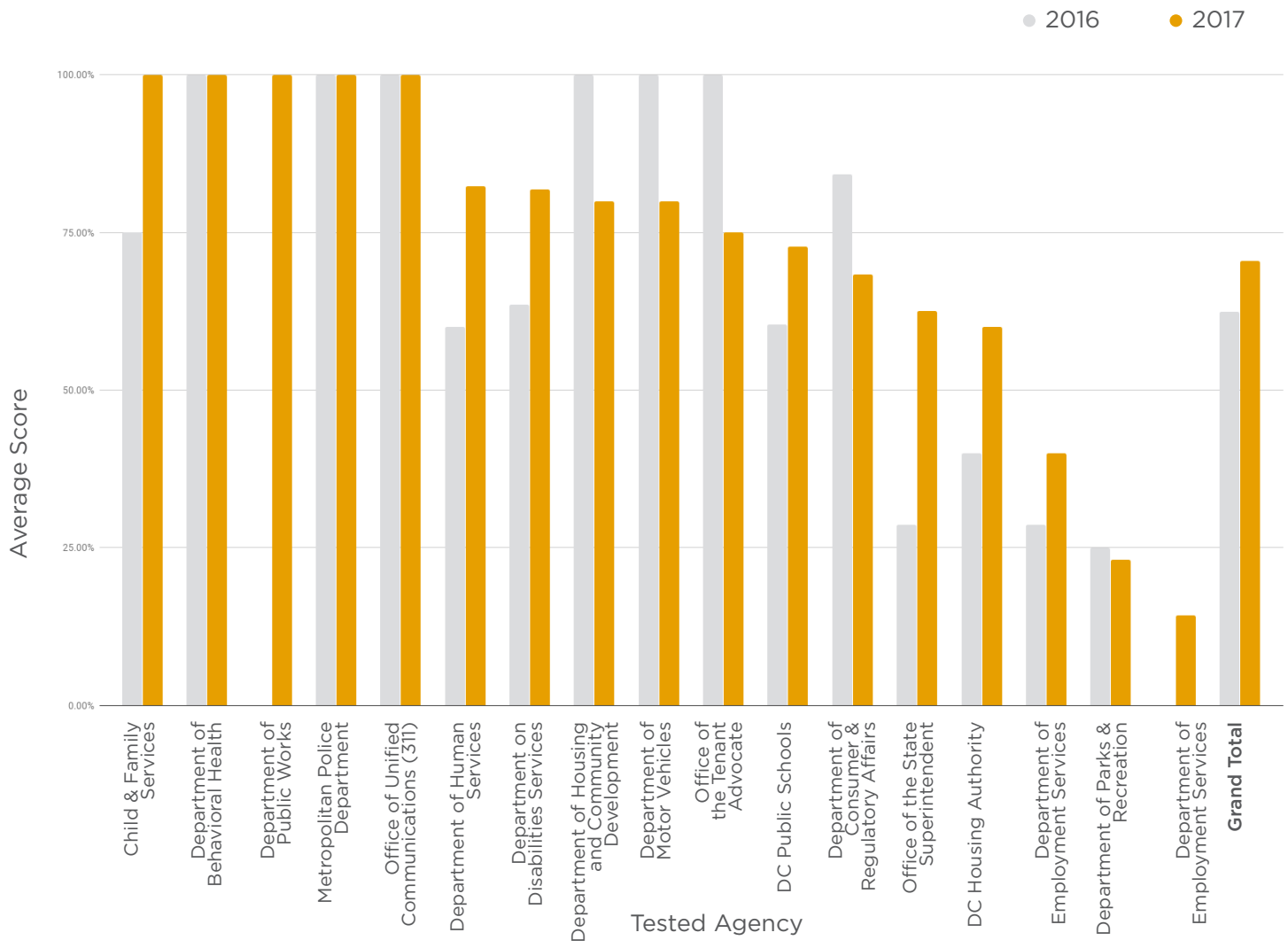
- 10 Agencies scored **higher** in 2017 than in 2016
- 3 Agencies received the **same score** in 2017 and 2016
- 4 Agencies scored **lower** in 2017 than in 2016

Agency Scores 2016 vs 2017

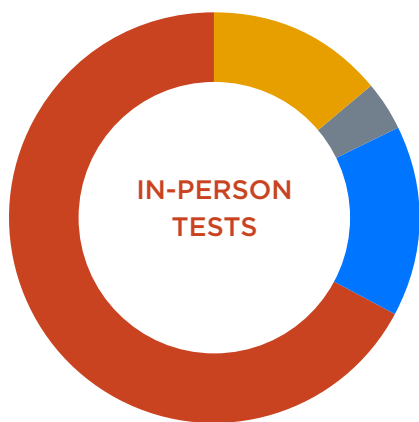


Agencies are ranked based on their overall scores and based on "interpretation rate"- the percentage of tests during which they provided interpretation services. Agency scores ranged from 1.7 to 6.0 on a scale of 0-6.

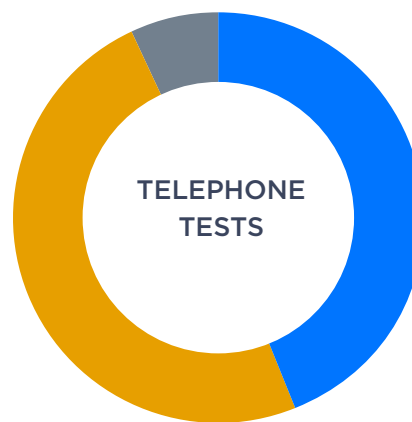
Agency Interpretation Rates



Type of Interpretation Provided



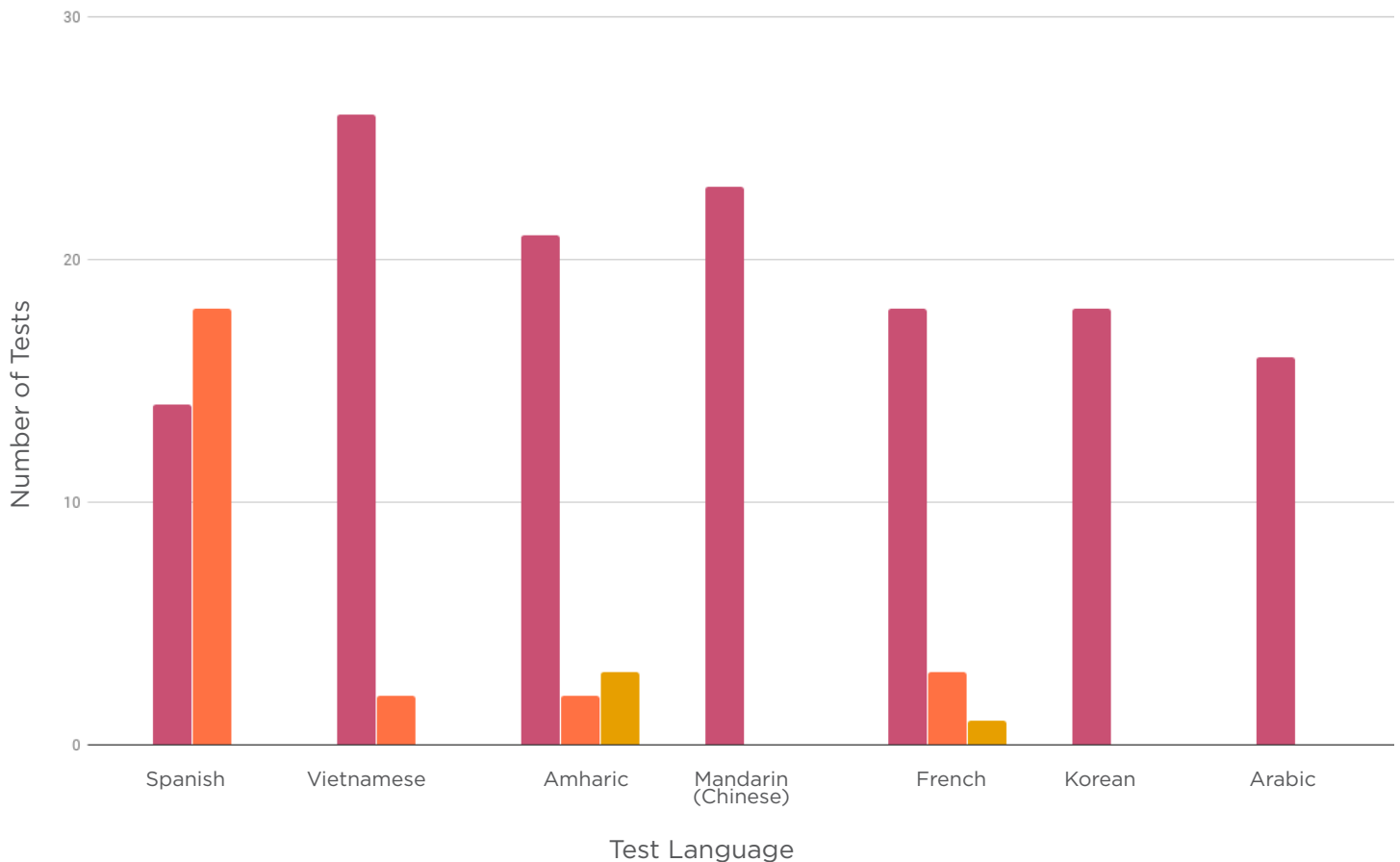
- 67% Language Line
- 14% Bilingual Employee
- 4% Alternative Form of Interpretation
- 15% No Interpretation Provided



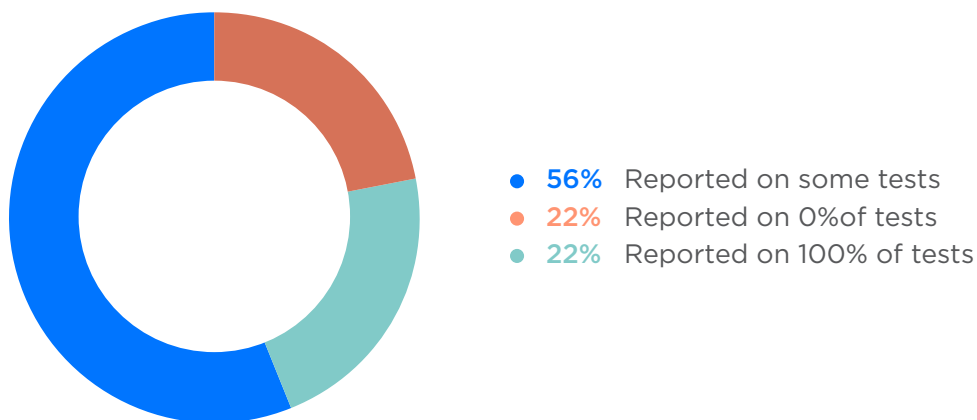
- 56% Language Line
- 43% Bilingual Employee
- 7% Alternative Form of Interpretation

Form of Interpretation by Test Language

- Language Line Solutions
- Bilingual Employee
- Alternative Form of Interpretation



Language Access Signage



At seven tested divisions (22%), all testers reported seeing language access signage during in-person tests. At seven divisions (22%), none of the testers reported seeing language access signage. At the seventeen other divisions (56%) some testers reported seeing signage while others did not.

Agency Highlights

Three covered entities with major public contact recently created new positions specifically dedicated to language access implementation. Meet fulltime Language Access Coordinators and change agents working to ensure full access and participation for LEP/NEP communities at the Metropolitan Police Department, the Office of the State Superintendent of Education, and the Department of Employment Services.





ELSA TEKLEHYMANOT

Office of the State Superintendent of Education

My work as a Language Access Coordinator started in July, 2016. What keeps me motivated as I work to implement the Language Access Act is a broader commitment “to serve DC students and families of all cultural and linguistic backgrounds”. My first task in this role was to do an agency-wide inventory of existing language access-related activities to understand where the agency is and what needed to be done to achieve full compliance. To do this, I met with every single division in the agency to understand their work, and assess division-specific language access needs. I then used input from divisions and OHR recommendations to develop a comprehensive action plan now incorporated into OSSE’s FY17/18 biennial language access plan.

PER THIS PLAN, OSSE ACCOMPLISHED THE FOLLOWING IN FY17:

- » Facilitated five (5) OHR-led training sessions and trained 148 members (front-line staff, mid-level managers and grantees).
- » Added a language drop-down menu frontline staff can select from to identify LEP/NEP individuals in the customer tracking systems used by OSSE’s Parent Resource Center and help desk.
- » Translated more than 45 vital documents into Amharic, Chinese, French, Korean, Spanish, and Vietnamese.
- » Reached out to more than 500 LEP/NEP community members through various community engagement activities.
- » Revised OSSE’s internal language access policy which was reviewed by OHR’s Language Access Program.
- » Enhanced the quick reference guide for telephonic interpretation services, and distributed it during training and through the internal agency newsletter.
- » Installed a double-handed phone on all frontline desks to ensure customers and employees have privacy when using a telephonic interpreter.
- » Ensured timely implementation of corrective actions by adding automated instructions in Spanish to the Parent resource Center call line, providing refresher training for all call agents, and translating relevant vital documents.
- » Created a language support section on OSSE’s webpage providing a description of the agency’s core services in Amharic, Chinese, French, Korean, Spanish, and Vietnamese.
- » Met reporting requirements and provided timely quarterly progress and annual reports.

FY18 PRIORITIES

- » Re-assess the internal language access data capturing and reporting method and implement a more accurate process – including data flow from grantees and contractors.
- » Reinitiate conversation with divisions to finalize a complete list of vital documents for each division (whether translated or not) and draft division specific language access services procedure/guide.
- » Work with OHR to be able to start facilitating the language access training in-house.



IMHOTEP NEWSOME

DC Metropolitan Police Department

I started working as the Language Access Coordinator for the District of Columbia Metropolitan Police Department on January 25, 2017. MPD's motto – "we are here to help" – is at the forefront of my mind while fulfilling the Language Access Coordinator role, as I try to ensure that all of the District's constituents receive the special attention they need, particularly underserved and vulnerable populations. MPD's Language Access Program helps ensure that we are helping every sector of the District's population and that no one is left marginalized, particularly our LEP/NEP population.

AS THE LANGUAGE ACCESS COORDINATOR, I HAVE IMPLEMENTED THE FOLLOWING

- » Expanded the bilingual certification testing of bilingual staff to include West African languages (current vendor could only certify in Amharic and Swahili); as a result we included Yoruba and Igbo.
- » Created a central tab on MPD's website for translated vital documents for the public
- » Updated all public-facing signage at MPD headquarters, and all District stations and sub-stations.
- » Secured new contract for language services for MPD.
- » Recertified members whose certification expired.
- » Created an online database with MPD's Police Academy to house certification skills of officers online.
- » Created and implemented video refresher training for 2,500 employees of MPD.
- » Trained all officers in-person during "Roll Call" of District 7.

FY18 PRIORITIES

- » Update MPD's current language access policy.
- » Expand our Language Stipend Program that certifies and pays bilingual officers.
- » Create an app that will allow officers in the field to collect signatures from LEP/NEP individuals who voluntarily waive their right to interpretation services.
- » Create a code of ethics for bilingual officers and provide basic interpreter training for certified bilingual officers.
- » Create a collaborative cultural-competency training video for MPD with DC's Consultative Agencies (MOLA, MOAPIA, MOAA).
- » Create an Administrative Assistant Position for MPD's Language Access Program.



HENRY JIMENEZ

DC Department of Employment Services

I started working as the Language Access Program Coordinator for the Department of Employment Services (DOES) on August 7th, 2017. I believe DOES' Language Access Program is very important to the agency because it is making a tremendous impact on advancing DOES' overall goal of improving customer service by providing language access training to all DOES employees and grantees. At the same time, it is helping to ensure that all LEP/NEP District residents receive equal access to DOES services.

THE IMPLEMENTATION OF THE LANGUAGE ACCESS ACT REQUIREMENTS HAS YIELDED THE FOLLOWING ACCOMPLISHMENTS:

- » During FY17, DOES served 5,394 LEP/NEP customers. This represents an 11% increase or 582 more LEP/NEP customers served in comparison to FY16.
- » Collected comprehensive data on LEP/NEP encounters on a quarterly basis pulling from all systems used by divisions, the American Job Centers (AJC), grantees, and partners.
- » Translated 73 vital documents into Spanish, including the Claimant Rights and Responsibility Handbook, and the Minimum Wage Amendment Revision Act Poster, which was translated into 5 other languages.
- » Reached 1,608 LEP/NEP individuals through 12 outreach events and programs conducted through MOUs with MOAPIA and MOLA.
- » Conducted an agency-wide assessment on language access compliance and held meetings with all DOES programs to identify areas of need and initiated technical support process.
- » Added the language access compliance requirements to all of DOES' MOUs and grant agreements and participated in all grantee and partner orientations.
- » Ensured that 301 DOES employees received language access compliance training.
- » Partnered with the Office of Public Affairs to launch an initiative to create bilingual (English/Spanish) messaging on social media.
- » Created a single language access policy for DOES combining 300.20-3 Language Access Program and 100.20-2 Language Access Request.

FY18 PRIORITIES

- » Continue collecting and reporting comprehensive data on LEP/NEP encounters on a quarterly basis.
- » Provide technical support to all divisions; designate a primary and secondary Language Access Liaison per program; and create standard operating procedures for language access activities.
- » Conduct regular site visits to all AJC locations in order to identify and address language needs.
- » Continue creating bilingual content for press releases, social media, and flyers.
- » Broaden the agency's outreach strategy to reach all communities in the District.
- » Ensure that DOES' Mobile Unit staff is trained, uses telephonic interpretation services to assist LEP/NEP customers, and has informational flyers in different languages.
- » Continue MOUs with MOLA and MOAPIA to coordinate outreach and education on DOES programs to the District's Asian and Pacific Islanders and Latino LEP/NEP populations.
- » Coordinate with the Office of Training and Professional Development to conduct language access training to all DOES public facing employees, managers and grantees.
- » Translate vital documents from all its divisions and programs, first into Spanish, and gradually into other languages such as Amharic, French, Chinese, Vietnamese and Korean.
- » Continue working with MOLA, MOAPIA, and MOAA on quality control for translated documents.

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. The Act's regulations also name the D.C. Language Access Coalition (LA Coalition) as an external non-governmental body to consult on the implementation of the Act (Section §1209).

These entities have provided the following recommendations for strengthening citywide language access implementation in FY18:

MAYOR'S OFFICE ON AFRICAN AFFAIRS

- » Provide language access and cultural competency training for DC government employees in order to equip them with tools to strengthen their constituent service as they serve LEP/NEP constituents.
- » Offer linguistically and culturally tailored programs and services and engage LEP/NEP communities by partnering with community-based and faith-based organizations.
- » Increase traffic and improve user experience by providing multilingual options on agency websites.
- » Hire qualified multilingual or bilingual staff in public-facing positions to ensure that agencies have culturally and linguistically competent staff serving LEP/NEP customers.
- » Improve signage by placing multilingual messages with culturally relevant images to increase visibility and to make the physical centers more welcoming for LEP/NEP.
- » Develop technologically innovative support such as the language access digital signage or mobile applications to strengthen agencies' communications efforts.

MAYOR'S OFFICE ON ASIAN AND PACIFIC ISLANDER AFFAIRS

- » Develop rigorous data collection on the language needs of AAPI clients and potential clients to ensure that language assistance is being provided.
- » Continue to raise public awareness of language access services by engaging with LEP/NEP constituents and making multilingual signage and easy-to-understand materials available.
- » Provide recurring cultural competency and language access compliance training to frontline staff especially at agencies with major public contact.
- » Develop and implement a quality control system to ensure accurate and culturally nuanced translations.
- » Respond to the language needs of clients and coordinate more effectively across agencies to better serve community members.

MAYOR'S OFFICE ON LATINO AFFAIRS

- » Identify, recruit and standardize the implementation of a bilingual emergency response team among major public contact agencies.
- » Implement a communication system among major public contact agencies to share best practices on outreach efforts for LEP/NEP residents.
- » Standardize Language Access digital signage and data collection strategies across major public contact agencies.
- » Designate a fulltime Language Access Coordinator in agencies with major public contact.
- » Recruit and train culturally and linguistically competent bilingual frontline staff in agencies with major public contact and disseminate language access resources within the agency.
- » Invest resources into consultative agencies for developing materials, tools, and additional resources to ensure that LEP/NEP residents are effectively being served.

DC LANGUAGE ACCESS COALITION

- » Send compliance updates to agency directors on a quarterly basis reminding them of the importance of language access compliance, especially as it relates to ensuring that all outreach efforts and campaigns reach LEP/NEP neighborhoods. For example, ensure that Board of Elections sends translated guides to voters, or at a minimum, inserts multilingual taglines in various languages.
- » Develop a special compliance program for covered entities providing public safety services to the public to ensure that these agencies are fully equipped to serve LEP/NEP communities.
- » Ensure that quarterly reports submitted by covered entities on the cost of providing language access services are accurate and include cost of hiring bilingual staff providing language assistance to customers.
- » Proactively hire bilingual staff and re-introduce the bilingual employee incentive program which compensates bilingual and culturally competent employees who offer valuable language skills.
- » Strengthen OHR's capacity to effectively investigate language access complaints by ensuring that OHR staff are trained and equipped to communicate effectively with complainants, apply the law, and provide competent service throughout the investigation process.
- » Improve OHR's enforcement practices by waiving the requirement for complainants to notarize sworn statements, allowing complainants to participate in the development and tracking of corrective actions, and by setting up fines for failure to comply with corrective actions.

Compliance Profile of Covered Entities with Newly Designated Language Access Points of Contact

While covered entities with major public contact are required to designate a Language Access Coordinator, develop a biennial language access plan, and report to OHR on a quarterly basis, Language Access Act regulations require the rest of the covered entities to appoint a Language Access Point of Contact tasked with coordinating the agency's compliance efforts. This Point of Contact is also required to a) submit an annual implementation report to OHR; b) attend an annual language access orientation; and c) report data on encounters with LEP/NEP customers. In FY17, a total of 23 covered entities designated a Language Access Point of Contact. The table below provides an overall profile of language access compliance for these agencies.

Baseline Compliance Areas						
Agency	LA POC Designation	Orientation Attendance	Annual Reporting	Telephonic Interpretation Account	FY17 Accomplishments/ Compliance Status	FY18 Priorities
Corrections Information Council	✓	✓	✓		<p>Reported 4 LEP/NEP encounters.</p> <p>Translated 2 vital documents into Spanish and Vietnamese.</p> <p>The agency has 1 bilingual Spanish-speaking employee.</p>	<p>Set up an account with the District's telephonic interpretation service provider.</p> <p>Provide language access training for public contact staff.</p> <p>Translate a summary of the agency's services and programs into 6 languages.</p> <p>Create language support pages on the agency's website.</p>
DC Board of Elections	✓	✓	✓	✓	<p>Reported 286 LEP/NEP encounters.</p> <p>Incorporated language access compliance into polling site worker training and provided 2 language access compliance trainings for public facing staff.</p> <p>Provided interpretation services and translated ballots at polling sites.</p> <p>3 bilingual employees on staff who speak Amharic, Spanish and Tigrinya.</p>	<p>Translate a summary of the agency's services and programs into 6 languages.</p> <p>Create language support pages on the agency's website.</p> <p>Translate prioritized vital documents into top languages spoken by LEP/NEP voters.</p> <p>Add taglines to all public facing vital documents.</p>

Baseline Compliance Areas						
Agency	LA POC Designation	Orientation Attendance	Annual Reporting	Telephonic Interpretation Account	FY17 Accomplishments/ Compliance Status	FY 18 Priorities
DC Commission on Arts and Humanities	✓	✓	✓	✓	<p>Reported 2 encounters with LEP/ NEP customers.</p> <p>Translated 2 vital documents into Spanish and French.</p> <p>Provided 2 language access compliance trainings for frontline staff.</p> <p>Prioritized vital documents for translation in FY18.</p> <p>5 bilingual employees who speak Spanish, Amharic, French, Tagalog, Polish and Gaelic</p>	<p>Translate a summary of the agency's services and programs into 6 languages</p> <p>Create language support pages on the agency's website.</p> <p>Translate a one page summary of all grants with descriptions and instructions into 2 languages.</p>
DC Health Benefit Exchange Authority	✓	✓	✓	✓	<p>Reported 5,896 LEP/NEP encounters.</p> <p>Trained 12 staff members on language access compliance requirements.</p> <p>Translated 47 vital documents (10 into Amharic, Chinese and French each, and 17 into Spanish)</p> <p>Translated vital documents are accessible in the forms & resources section of the agency's website.</p> <p>Multilingual taglines in 17 languages have been placed on the agency's website.</p> <p>Engaged LEP/NEP customers through a network of linguistically diverse brokers and assisters.</p> <p>Implemented a language preference survey in 50+ languages to collect customer language needs.</p> <p>5 certified bilingual employees who speak Spanish and Amharic.</p>	<p>Develop an internal language access policy.</p> <p>Ensure grantee and contractor compliance with language access requirements by providing training and requiring network of providers to certify compliance in writing.</p> <p>Ensure that LEP/NEP encounters with providers are collected and reported to the agency on a quarterly basis.</p>
Office of Police Complaint	✓	✓	✓	✓	<p>Reported encountering LEP/NEP customers who speak Spanish, Amharic, Mandarin and Korean.</p> <p>Translated 1 vital document into Chinese.</p> <p>Participated in 12 outreach events specifically targeting the District's Latino community.</p> <p>2 bilingual employees who speak Spanish.</p>	<p>Reported encountering LEP/NEP customers who speak Spanish, Amharic, Mandarin and Korean.</p> <p>Translated 1 vital document into Chinese.</p> <p>Participated in 12 outreach events specifically targeting the District's Latino community.</p> <p>2 bilingual employees who speak Spanish.</p>

Baseline Compliance Areas						
Agency	LA POC Designation	Orientation Attendance	Annual Reporting	Telephonic Interpretation Account	FY17 Accomplishments/ Compliance Status	FY 18 Priorities
Department of Forensic Sciences	✓	✓	✓	✓	<p>Reported no LEP/NEP encounters.</p> <p>Created a language support page in Spanish on the agency's website.</p> <p>4 bilingual employees who speak Hindi, Punjabi and Spanish.</p>	<p>Set up an account with the District's telephonic interpretation service provider.</p> <p>Provide language access compliance training for public facing employees.</p>
Office of Attorney General	✓	✓	✓	✓	<p>Reported 155 encounters with LEP/NEP customers.</p> <p>Translated 255 vital documents into the top 6 foreign languages spoken in the District of Columbia.</p> <p>Provided 5 language access compliance trainings for frontline staff.</p> <p>7 bilingual employees who speak Spanish.</p>	<p>Translate a summary of the agency's services and programs into 6 languages and create language support pages on the agency's website.</p> <p>Attach all translated documents to language support pages by language.</p>
Office of Victim Services and Justice Grants	✓	✓	✓	✓	<p>Reported 0 LEP/NEP encounters.</p> <p>Provided language access compliance training for 2 employees and 12 grantees.</p>	<p>Develop a language access policy outlining language access responsibilities for grantees.</p> <p>Ensure that all grantees providing services to the public report data on LEP/NEP encounters on a quarterly basis; and certify that they are meeting language access requirements.</p> <p>Translate a summary of the agency's services and programs into 6 languages and create language support pages on the agency's website.</p>

	Baseline Compliance Areas					
Agency	LA POC Designation	Orientation Attendance	Annual Reporting	Telephonic Interpretation Account	FY17 Accomplishments/ Compliance Status	FY 18 Priorities
Public Service Commission	✓	✓	✓	✓	Reported 42 LEP/NEP encounter. Participated in 18 outreach events and reached 710 constituents.	Provide language access compliance training to all public contact employees. Translate a summary of the agency's services and programs into 6 languages and create language support pages on the agency's website. Translate prioritized vital documents into top languages spoken by LEP/NEP residents.
Office of Chief Financial Officer	✓	✓	✓	✓	Reported 3426 encounters with LEP/NEP customers (based on telephonic interpretation usage data) 9 bilingual employees on staff.	Provide language access compliance training for all public contact staff. Translate a summary of the agency's services and programs into 6 languages and create language support pages on the agency's website. Translate prioritized vital documents into top languages spoken by LEP/NEP residents and business owners.
Real Property Tax Appeals Commission	✓	✓	✓	✓	Reported 0 LEP/NEP encounters.	Provide language access compliance training for all public contact staff. Translate a summary of the agency's services and programs into 6 languages and create language support pages on the agency's website.

The following covered entities successfully designated a Language Access Point of Contact, and participated in a language access compliance orientation offered by OHR, but did not meet FY17 reporting requirements: District of Columbia Department of For-Hire Vehicles; Office of Cable Television, Film, Music and Entertainment; Office of Chief Medical Examiner; Office of Chief Technology Officer; Office of Disability Rights; DC Developmental Disabilities Council; Department of Insurance, Securities and Banking; Office of Employee Appeals; Office of Inspector General; DC Retirement Board; and the DC Housing Finance Agency. In FY18, OHR will meet with each of these agencies to identify FY18 implementation priorities and ensure that they are equipped to meet reporting requirements.

Compliance Rating Methodology

Covered Entities with Major Public Contact

ABOUT THE SCORECARDS

This report features compliance scorecards for **38 District agencies with major public contact**. 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). Each scorecard includes a numeric evaluation, a narrative description of an agency's accomplishments, and recommendations for addressing gaps in compliance. The numeric evaluation provides an **agency's overall compliance score based on three performance categories: preparedness, accessibility, and quality**.

The category of preparedness captures whether an agency has laid the necessary 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. Field test results and formal complaints filed against the agency are considered in this category.

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 72](#).

RATING METHODOLOGY

PREPAREDNESS	Requirements	Evaluation questions
	P1. Agency provided comprehensive data on FY17 encounters.	<ul style="list-style-type: none"> Did the agency record its encounters with LEP/NEP constituents and report them to OHR? Is the agency using more than one method to collect data? Did agency implement OHR recommendations or FY17/18 BLAP action items related to data collection?
	P2. Agency has a current language access policy.	<ul style="list-style-type: none"> Did the agency develop or revise its language access policy over the last three years? Has the agency submitted a policy for OHR's approval within the last three years?
	P3. Agency staff were trained in FY17.	<ul style="list-style-type: none"> Did the agency train staff on language access requirements and resources? Did the agency implement OHR recommendations and/or FY17/18 BLAP action items related to staff training?
	P4. Agency communicated effectively.	<ul style="list-style-type: none"> Did the agency send a representative to 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	P5. Agency took steps to meet grantee and contractor compliance requirements.	<ul style="list-style-type: none"> Did the agency take reasonable steps to ensure that its grantees and contractors comply with the Language Access Act? Did the agency train grantees/contractors and their employees on language access compliance requirements? Did the agency modify MOUs or obtain signed agreements from grantees/contractors to certify compliance?

ACCESSIBILITY	Requirements	Evaluation questions
	A6. Agency displayed adequate signage in public facing locations.	<ul style="list-style-type: none"> Do agency's public facing locations display multilingual signs informing LEP/NEP customers of their right to language assistance? Does the agency visibly display language identification posters, "I Speak" cards, multilingual banners, or other tools allowing LEP/NEP customers to identify their language?
	A7. Vital documents were translated and/or updated in FY17.	<ul style="list-style-type: none"> Did the agency translate any vital documents in FY17? Has the agency translated documents into all languages that the agency regularly encounters? Did the agency implement OHR recommendations or FY17/18 BLAP action items related to document translation?
	A8. Translated vital documents are accessible on the agency's website.	<ul style="list-style-type: none"> Does the agency have any web pages in languages other than English? Are the agency's public facing vital documents available on the website in other languages? Did the agency implement OHR recommendations or FY17/18 BLAP action items related to online accessibility of translated documents?
ACCESSIBILITY	A9. Efforts were made to reach out to LEP/NEP communities in FY17.	<ul style="list-style-type: none"> Did the agency conduct outreach specifically targeting LEP/NEP communities? Did outreach initiatives bring the agency into meaningful contact with LEP/NEP constituents? Did the agency implement OHR recommendations or FY17/18 BLAP action items related to outreach to LEP/NEP communities?

QUALITY (Q)	Requirements	Evaluation questions
	Q10. No complaints were filed against the agency in FY17.	<ul style="list-style-type: none"> • Were any complaints filed against the agency?
	Q11. Agency was not found in non-compliance in FY17.	<ul style="list-style-type: none"> • Did any complaints result in a non-compliance finding? • Has the agency received multiple complaints regarding the same issue? • Does the agency have outstanding corrective actions?
	Q12. No tester was turned away during tests.	<ul style="list-style-type: none"> • 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 employee or interpretation received requested information or services.	<ul style="list-style-type: none"> • 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 FY17.	<ul style="list-style-type: none"> • Has the agency taken steps to provide access to LEP/NEP customers? • Has the agency addressed some, if not all, systemic issues to close gaps in compliance and improve agency's service to LEP/NEP customers? • Do FY17 testing outcomes (where applicable), self-reported updates, OHR observations, or stakeholder feedback indicate that the agency is on track with language access implementation?

Implementation by the numbers

Summary of findings based on implementation reports from 38 covered entities with major public contact assessed in FY17.

PREPAREDNESS

- » **204,783** LEP/NEP encounters were collectively reported by 38 major public contact agencies
- » **4,746** employees, contractors and grantees received language access compliance training; **1,397** were trained by OHR
- » **200** grantee and contractor employees were trained on language access compliance requirements
- » **33** agencies currently have a language access policy

ACCESSIBILITY

- » **71,859** calls were made by agency employees to reach a telephonic interpreter. Telephonic interpretation was provided in **73** different languages.
- » In-person interpretation services were provided in **43,494** instances.
- » **2000** translations of vital documents were reported in FY17.
- » **229** calls were made by agency employees to access video remote interpretation services
- » **35** agencies reported conducting outreach to LEP/NEP communities, attending or hosting a total of **699** outreach events in FY17
- » Translated documents are available on the websites of **31 agencies**

Based on language line¹ usage, the top 10 languages served were:

Spanish	Amharic	French	Mandarin	Vietnamese	Arabic	Tigrinya	Cantonese	Bengali	Haitian Creole
57,479	7,372	1,922	1,396	908	449	377	311	289	130

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

Spanish	Amharic	French	Mandarin	Chinese	Vietnamese	Korean	Tigrinya	Arabic	Cantonese
127,735	15,408	4,022	1,941	1,743	1,415	547	509	426	350

QUALITY

- » 59% of tested agencies scored higher in FY17 than in FY16.
- » 86% of the in-person field tests conducted at 9 agencies provided adequate language assistance.
- » 57% of the telephone field tests conducted at 15 agencies provided adequate language assistance.
- » In FY17, OHR received 20 **more Language Access complaints** than in FY16, a 111% increase.

² Telephonic Interpretation services provided by Language Line Solutions.

Major Public Contact Agency Scorecards





Alcoholic Beverage Regulation Administration

6/12

overall compliance score

7/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Korean, Chinese, Amharic

3/5

Preparedness

ABRA failed to meet preparedness requirements in FY17 and needs to take immediate steps to provide language access compliance training to public

1/4

Accessibility

ABRA conducted public meetings in LEP/NEP communities in FY17. However, the agency did not translate any vital documents, upload translated documents to its website, or meet signage requirements in order to improve accessibility.

2/3

Quality

ABRA was not tested in FY17. While no complaints were filed against ABRA in FY17 and the agency met baseline reporting requirements, the agency made insufficient efforts to address ongoing compliance gaps.

30

FY17 Total Encounters

58

FY16 Total Encounters

OHR notes that in FY17, the Alcoholic Beverage Regulation Administration (ABRA) met reporting requirements, collected data on LEP/NEP encounters, and reached diverse LEP/NEP constituents through community-based meetings.

However, ABRA has not addressed critical compliance gaps highlighted over the last three years. ABRA's FY17 reports indicate that the agency has not provided language access compliance training for its frontline staff, field inspectors, and employees despite the high level of interaction the agency is known to have with the District's LEP/NEP business community. ABRA also failed to translate vital documents, suggesting that the significant volume of vital information shared by the agency continues to be provided to the public in English only. In addition to failing to meet these preparedness and accessibility requirements, ABRA did not take steps to improve language access signage in public facing locations, or engage grantees and contractors as required by OHR in FY17.

OHR is hereby putting the agency on notice to take aggressive steps in FY18 to a) schedule agency-wide language access compliance training for all public contact and field staff; b) work 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; c) incorporate multilingual taglines in all vital documents not yet translated; and d) make translated documents and multilingual informational videos accessible on the ABRA website.



Child & Family Services Agency

14/14

overall compliance score

13/14

FY16 Score

FY17 Top Languages Encountered:

Spanish, French, Amharic, Haitian Creole, Vietnamese, Farsi, Somali, Tigrinya, Swahili, Arabic

5/5

Preparedness

CFSA's reported LEP/NEP encounters rose by 764 from FY16 to FY17. The agency revised its policy; trained staff, grantees, and contractors; and met reporting and planning requirements.

4/4

Accessibility

CFSA updated multilingual signage displayed at public-facing locations, translated a vital document into Spanish, Amharic and Chinese and engaged Spanish-speaking LEP/NEP constituents. In FY18, CFSA needs to improve accessibility of its website by centralizing translated documents under the "language support" section of the website.

5/5

Quality

No complaints were filed against CFSA in FY17. Field testing results indicated that all four telephone tests received language assistance. Agency continues to make steady efforts to fully meet the requirements of the Language Access Act.

2,226

FY17 Encounters

1,462

FY16 Encounters

4 out of 4

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

OHR applauds the Child and Family Services Agency (CFSA) for another year of proactive implementation of language access and of continued efforts to meet the requirements of the Language Access Act.

Notable CFSA achievements include a perfect score in FY17 language access testing results showing that all four telephone testers who called CFSA's Hotline received interpretation services, and a steady but significant increase over the last two years in the number of LEP/NEP encounters reported by the agency (626 in FY15, 1462 in FY16, and 2226 in FY17) which, in FY17, also reflects LEP/NEP encounters reported by CFSA grantees and contractors.

Additionally, CFSA met all reporting and planning requirements in FY17; revised its language access policy; trained 265 frontline staff, managers, grantees and contractors through weekly and quarterly language access trainings; and conducted outreach to Spanish-speaking LEP/NEP constituents by partnering with the Mayor's Office on Latino Affairs. CFSA also successfully met three key FY17/18 Biennial Language Access Plan (BLAP) goals: a) translating the 'Youth Bill of Rights' into Spanish, Amharic, and Chinese; b) providing language proficiency testing for bilingual staff; and c) updating multilingual signage displayed at public facing locations.

In FY18, OHR recommends that CFSA institute a data collection strategy for capturing bilingual staff encounters with LEP/NEP customers, and continue efforts to engage and train grantees and contractors on language access compliance requirements. As previously recommended, the agency needs to take immediate steps to centralize translated vital documents under the 'language support' section of its website, and follow through on its FY17/18 BLAP plans to expand outreach efforts to African, Asian and other LEP/NEP populations in FY18.



DC Housing Authority

7/14

overall compliance score

7/14

FY16 Score

FY17 Top Languages Encountered:

Spanish, Mandarin, Amharic, Arabic, Vietnamese, Cantonese, French, Tagalog, Japanese

4/5

Preparedness

DCHA reported encounters with LEP/NEP customers and trained 178 employees in FY17. Agency needs to provide additional training to frontline employees, and ensure grantee/contractor compliance in FY18.

1/4

Accessibility

DCHA enhanced language access signage in FY17. Agency needs to take steps to engage LEP/NEP residents and translate vital documents in FY18.

2/5

Quality

No language access public complaints were filed against DCHA in FY17. 5 out of 8 telephone testers were denied language assistance. Agency needs to address recurring issues with quality of services provided to LEP/NEP callers.

730

FY17 Encounters

192

FY16 Total Encounters

3 out of 8

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

OHR credits the DC Housing Authority (DCHA) for taking some steps in FY17 to bring the agency into greater compliance with requirements of the Language Access Act. In FY17, DCHA a) provided mandatory language access compliance training for 178 - mostly frontline - employees; b) improved language access signage in all public housing properties by placing large multilingual posters and desktop signs; and c) provided the agency's inspectors, foremen, and property managers with language access cards containing instructions on using telephonic interpretation services. DCHA also reported significantly higher FY17 encounters with LEP/NEP customers, as compared to FY16.

FY17 field testing conducted at DCHA indicated that only 3 out of 8 tests provided the requested services. While 3 out of 5 telephone testers who called DCHA's Customer Call Center received prompt interpretation services in Chinese, French, and Arabic, none of the 3 testers who contacted DCHA's Garfield Terrace property received interpretation services. All 5 testers who were denied interpretation services reported that DCHA staff either hung up the call, told them to call back with someone who spoke English, or gave them the 1-800 number to access Language Line Solutions directly before hanging up the call.

This is an ongoing challenge, particularly at DCHA public housing properties, where improvements must be made with regard to access for LEP/NEP customers and customer service. While OHR acknowledges that some progress has been made on this front, test results indicate that the problem persists. In FY18, OHR once again instructs DCHA to provide comprehensive in-person training for all employees in public contact positions at DCHA's Call Center and public housing properties, and revise the agency's language access policy by including disciplinary measures for employees who deny services to LEP/NEP customers or display unprofessional behavior.

In addition to addressing major quality concerns in FY18, DCHA needs to translate vital documents as outlined in the agency's FY17/18 BLAP, conduct meaningful outreach to LEP/NEP residents, and upload translated documents to the agency's website. Finally DCHA is required to take immediate steps to ensure that its grantees and contractors comply with the requirements of the Language Access Act.

12/12

overall compliance score

12/12

FY16 Score

FY17 Top Languages Encountered:

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

5/5

Preparedness

DCHR reported comprehensive data on FY17 LEP/NEP encounters, and trained staff on language access compliance.

4/4

Accessibility

In FY17, DCHR conducted targeted outreach and provided multilingual workshops to LEP/NEP job seekers, translated two vital documents into Spanish, and displayed multilingual signage.

3/3

Quality

DCHR was not tested in FY17 and no complaints were filed against the agency. DCHR continues to meet all compliance requirements.

268

FY17 Encounters

80

FY16 Encounters

The Department of Human Resources (DCHR) continues to demonstrate an exemplary level of commitment to meeting language access compliance requirements. In FY17, DCHR met all reporting requirements, tracked language assistance provided by bilingual staff, and provided comprehensive data on LEP/NEP encounters showing a significant increase in the number of customers who received language assistance. The agency also conducted targeted outreach to LEP/NEP job seekers by offering multilingual job search and readiness classes through partnerships with the Mayor's Office on Latino Affairs, the Mayor's Office on African Affairs, and various immigrant-serving community-based organizations. OHR applauds DCHR for proactively employing the full range of strategies required to engage and serve LEP/NEP residents.

Through the Center of Learning Development, DCHR continues to facilitate the provision of language access compliance training to District employees, and consistently ensure that its employees receive regular training. DCHR also translated two vital documents – an FMLA application form, and a resume building guide – into Spanish, and met signage requirements. OHR congratulates DCHR for these accomplishments and for the agency's proven commitment to achieving the goals of the Language Access Act.

In FY18, OHR looks forward to partnering with the DCHR to host a citywide bilingual hiring fair aimed at helping District agencies meet the rising demand for bilingual employees in public contact positions. This will give agencies an opportunity to recruit from a pool of certified bilingual candidates who can bring linguistic and cultural competence and assist agencies. Along with the Mayor's Offices on African, Asian and Pacific Islander, and Latino Affairs, OHR seeks to work with DCHR to jointly develop guidance for personnel authorities of covered entities on certification standards for bilingual staff in public contact positions.



DC Office of Lottery and Charitable Games

11/12

overall compliance score

6/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Korean, Amharic, Vietnamese

5/5

Preparedness

DCLB reported FY17 encounters with LEP/NEP customers, trained 103 employees on language access compliance, and adopted a revised language access policy.

3/4

Accessibility

DCLB reported translating 3 vital documents into Spanish, and conducted outreach to diverse LEP/NEP populations. In FY18, DCLB needs to add a 'language support' feature on its website and upload translated vital documents.

3/3

Quality

No language access public complaints were filed against DCLB in FY17. The agency was not tested in FY17. DCLB took significant steps to meet compliance requirements in FY17.

24

FY17 Encounters

31

FY16 Encounters

OHR applauds the DC Office of Lottery and Charitable Games (DCLB) for working diligently to address language access compliance gaps. In FY17, DCLB improved the agency's preparedness to serve LEP/NEP customers by a) training 103 employees, including senior staff and frontline managers; b) adopting a new language access policy which provides comprehensive guidance on language access implementation; and c) revising sign-in sheets to improve data collection on LEP/NEP encounters.

The agency also made significant progress in regards to accessibility by meeting language access signage requirements, and by conducted targeted outreach to LEP/NEP populations in the Latino, and Asian and Pacific Islander communities in partnership with community-based organizations and the Mayor's constituency offices. Additionally, DCLB reported translating three vital documents (including a checklist and instructions for charitable game license applicants) as well as the front page of the D.C. Scratchers ticket into Spanish.

In FY18, OHR once again urges DCLB to create a "language support" feature on the agency's website to provide a point of entry for LEP/NEP readers which groups all translated documents by language. OHR also looks forward to receiving an update on the agency's efforts to collect comprehensive data on LEP/NEP encounters and document language needs of the linguistically diverse retailers with whom DCLB interfaces in coordinating sales. Finally, as the agency continues to recruit bilingual staff into coordinator positions, OHR recommends that the agency provide language proficiency testing to formally assess their language proficiency.



DC Office on Aging

5/12

overall compliance score

8/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Mandarin, Haitian Creole, Amharic, Vietnamese, Farsi, Cantonese, Tagalog, Arabic

2/5

Preparedness

DCOA provided data on LEP/NEP encounters but did not provide language access compliance training to staff or grantees in FY17. Agency needs to meet reporting, training, and planning requirements in FY18.

1/4

Accessibility

DCOA's FY17 reports do not indicate that the agency translated vital documents or conducted outreach to LEP/NEP populations in FY17.

2/3

Quality

DCOA was not tested in FY17, and no complaints were filed against the agency. DCOA needs to make significant improvements in FY18.

2,620

FY17 Encounters

860

FY16 Encounters

OHR notes that DC Office on Aging (DCOA) has had a strong track record of compliance with the requirements of the Language Access Act. However, in FY17, the agency did not meet reporting requirements or provide sufficient information on efforts made to sustain compliance over the reporting period.

While DCOA provided data on encounters with LEP/NEP customers which shows a significantly higher volume of encounters in FY17 as compared to FY16, the agency did not report on efforts to engage LEP/NEP customers, translate vital documents, or provide language access compliance training to DCOA employees in FY17.

OHR urges DCOA to take immediate steps to address the gap in reporting and provide an update on any activities that the agency has engaged in over the FY17 period to meet language access compliance requirements. In FY18, DCOA needs to satisfy quarterly reporting requirements, maintain consistent communication with OHR, and develop a comprehensive plan for meeting accessibility and preparedness requirements.

In order to successfully address compliance gaps in FY18, DCOA needs to: a) provide agency-wide language access training; b) translate vital documents; c) improve accessibility of the agency's website; and d) convene and train grantees to ensure they comply with language access requirements.



11/12

overall compliance score

11/12

FY16 Score

FY17 Top Languages Encountered:

Spanish

5/5

Preparedness

DCOZ reported FY17 encounters with LEP/NEP customers, trained public contact staff, and met all reporting requirements.

3/4

Accessibility

DCOZ translated the Zoning Handbook into Spanish. Agency's translated documents are centralized under the website's "language support" section. In FY18, DCOZ needs to proactively engage LEP/NEP populations.

3/3

Quality

No language access public complaint was filed against DCOZ in FY17. The agency was not tested in FY17.

11

FY17 Encounters

14

FY16 Encounters

OHR commends the Office of Zoning (DCOZ) for consistent and effective implementation of Language Access Act compliance requirements. In FY17, DCOZ continued taking proactive steps to meet preparedness requirements by meeting reporting requirements, and by ensuring that public contact employees routinely receive language access training.

The agency also followed through on FY17/18 BLAP plans and translated the Zoning Handbook into Spanish. This vital document is accessible on the agency's website. In FY18, OHR looks forward to the implementation of DCOZ' plan to translate the Zoning Handbook into additional languages, and to see all links to translated documents centralized in the "language support" section of the DCOZ website.

While the agency continues to report minimal encounters with LEP/NEP customers, OHR once again urges DCOZ to take proactive steps to engage LEP/NEP communities who stand to benefit from learning about the agency through linguistically targeted engagement efforts. In FY18, OHR invites DCOZ to partner with the Mayor's constituency offices and immigrant-serving community-based organizations to comply with the Language Access Act's outreach requirement.

11/12

overall compliance score

12/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Mandarin, Amharic, Farsi, French,
Turkish, Cantonese, Russian, Tigrinya

4/5

Preparedness

DCPL reported data on FY17 LEP/NEP encounters and trained new hires on language access compliance. DCPL needs to provide in-person training for frontline staff in FY18.

4/4

Accessibility

DCPL translated vital documents, and centralized them by language on its website. DCPL engaged diverse LEP/NEP communities through language-specific programming and targeted events.

3/3

Quality

DCPL was not tested in FY17 and no complaints were filed against the agency.

233

FY17 Encounters

21,079

FY16 Encounters

OHR notes that the DC Public Library (DCPL) has made steady efforts over the years to meet the requirements of the Language Access Act and fulfill planning and reporting requirements. In FY17, DCPL a) provided language access compliance training to 40 new hires; b) engaged multilingual families through targeted language-specific programming provided in the community and throughout its branches; and c) translated 5 vital documents, including a brochure, and a summary of the agency's strategic plan which were translated into 6 languages, an "Enjoy your Library" brochure translated into 4 languages, and two informational flyers translated into Spanish and Amharic.

DCPL also reported encounters with LEP/NEP customers in FY17, and indicated that 1922 individuals in the agency's customer tracking system self-identified as limited or non-English proficient. To continue improving the quality of data collected, the agency has added a 'language preference' feature to the online registration form completed by customers and to the Interaction Tracking Software used by public-facing staff. Additionally, DCPL worked with the Mayor's constituency offices to promote programs to LEP/NEP populations, and distributed new desktop signage for interpretation services to all of its branches. OHR commends DCPL for continuing to take proactive steps to improve accessibility of its services.

In FY18, OHR urges DCPL to prioritize in-person language access training for public contact staff to ensure that all branch-level employees are equipped to serve and communicate with LEP/NEP customers. Given the low usage of telephonic interpretation services through Language Line Solutions, OHR recommends that the agency take immediate steps to create a training plan that will allow frontline staff at the branch level to participate in in-person training. If DCPL is currently relying on bilingual employees to communicate with LEP/NEP customers, then OHR strongly advises that DCPL provide language proficiency testing to certify its bilingual staff.

In addition to agency-wide in person-training, OHR once again advises DCPL take immediate steps to place links to translated documents directly on the homepage, and address the labeling of translated documents on its website to ensure that the titles appear in the language they have been translated into instead of in English.

8/14

overall compliance score

8335

FY17 Encounters

22394

FY16 Encounters

FY17 Top Languages Encountered:

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

3/5

Preparedness

DCPS provided data on FY17 encounters, but did not meet training requirements in FY17. In FY18, agency needs to provide language access compliance training for all public contact staff, adopt a language access policy, and ensure that grantees and contractors fulfill compliance

3/4

Accessibility

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

2/5

Quality

No language access public complaints were filed against DCPS in FY17. FY17 field testing results indicate that 2 out of 23 in-person testers and 10 out of 21 telephone testers did not receive language assistance. DCPS has to take proactive steps in FY18 to improve language access implementation.

21 out of 23

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

11 out of 21

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

OHR notes that field testing conducted at the District of Columbia Public Schools (DCPS) in FY17 shows a slight improvement in scores, as compared to FY16. While 21 out of 23 (91%) in-person testers eventually received interpretation services, only 11 out of 21 (52%) of telephone testers received language assistance. Most testers reported that employees recognized the need for interpretation; however, several testers reported that agency employees did not know the proper procedure for accessing a telephonic interpreter and ended up disconnecting their call, having to ask a colleague for help, or making the tester wait to access an interpreter. Overall, FY17 test results indicate that language access is being provided inconsistently over the phone and that frontline staff at school level are not trained or fully equipped to serve English Language Learners (ELLs) or LEP/NEP families. Additionally, tests reveal that at least half of the tested schools did not display any kind of multilingual signage indicating availability of language assistance.

Given these results, OHR once again urges DCPS to address the ongoing gap in compliance as it relates to meeting training requirements by immediately providing language access compliance training for all frontline staff across the school system. While DCPS reported training 234 employees in FY17, the agency has still not taken any action to fulfill the required system-wide training of key frontline staff such as teachers, counselors, and administrators, most of whom have never before received language access training.

OHR also strongly recommends that DCPS take immediate steps to certify bilingual staff that the school system relies on for provision of language assistance. FY17 field testing conducted at 6 schools indicated that 18% of testers received language assistance directly from a bilingual employee. Providing language proficiency testing to bilingual staff will help ensure that bilingual employees are fully qualified to communicate effectively with ELL students and LEP/NEP families.

DCPS' FY17 reports indicate that the agency translated a total of 428 vital documents including forms, program brochures, event flyers and letter to parents which were translated into up to five languages (Spanish, Amharic, Chinese, French, and Vietnamese), as well as student-specific information and reports translated into a student or parent's spoken language. DCPS also engaged ELL students and LEP/NEP families through 41 school events, parent teacher meetings, and community meetings. DCPS reports that the agency is in the planning phase as it relates to a) training the agency's senior team; b) creating a full time Language Access Coordinator position; c) adopting a language access policy; d) putting systems in place to monitor compliance of grantees or contractors; e) implementing a new data collection mechanisms to track LEP/NEP encounters; and f) developing language access signage for schools.

OHR looks forward to receiving implementation updates on these plans and once again advises DCPS to take proactive steps in FY18 to address significant and long-standing compliance gaps.

14/14

overall compliance score

14/14

FY16 Score

FY17 Top Languages Encountered:

Spanish, Amharic, French, Chinese, Vietnamese, Albanian, Tigrinya, Mandarin, Russian, Korean

5/5

Preparedness

DBH fully met preparedness requirements in FY17 by meeting reporting deadlines, updating its language access policy, training staff and grantees, and by collecting comprehensive data on encounters with LEP/NEP customers.

4/4

Accessibility

In FY17, DBH produced 30 translated vital documents, and participated in over 55 community outreach events through which LEP/NEP residents were engaged.

5/5

Quality

All in-person and telephone testers received language assistance. No complaints were filed against DBH in FY17.

9,023

FY17 Encounters

8,312

FY16 Encounters

4 out of 4

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

4 out of 4

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

OHR applauds the Department of Behavioral Health (DBH) for methodically meeting the full range of language access implementation requirements, and for receiving a perfect score on language access field tests for a second year in a row. All testers who visited DBH offices in person or called the DBH Helpline in FY17 were provided with language assistance via a bilingual employee or a telephonic interpreter. OHR congratulates DBH for demonstrating, year after year, that its employees are well trained and fully equipped to meet the needs of LEP/NEP customers.

OHR particularly credits DBH for providing comprehensive data on the agency's FY17 LEP/NEP encounters showing an increase of 711 as compared to FY16. DBH's report on LEP/NEP individuals served in FY17 relied on multiple data points including a) reports from the agency's use of video remote, telephonic, and in-person interpretation services, b) records from its ICAMS customer tracking system, c) reports from grantees and contractors, and d) bilingual staff logs tallying encounters in which bilingual staff directly assisted LEP/NEP customers in their native language. With such a comprehensive data collection mechanism in place, DBH is exceptionally well-positioned to track language service needs of the LEP/NEP populations it serves.

In FY17, DBH provided a total of 21 training events expanding language access compliance training to 260 frontline staff, 46 of whom are employed by DBH's provider network. DBH also translated 15 vital documents producing 30 new in-language documents -14 in Spanish, 6 in Amharic, 3 in Vietnamese, 3 in French, 2 in Korean, 1 in Chinese, and 1 in Tigrinya. While most of these documents were used in case-specific or direct correspondence with LEP/NEP customers, other documents such as the agency's Consumer Rights Statement have been made available on DBH's website.

In FY18, OHR encourages DBH to institutionalize the technical assistance that it has been providing to its provider network to ensure that all grantees and partners fulfill their legal obligations under the Language Access Act. While DBH has taken steps to improve accessibility of translated vital documents on the agency website, centralizing all translated documents under the language support section of the website will make it even easier for LEP/NEP readers to locate resources in their language.



8/14

overall compliance score

9/14

FY16 Score

FY17 Top Languages Encountered:

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

4/5

Preparedness

DCRA trained 55 new employees on language access compliance, provided data on FY17 encounters with LEP/NEP customers, and has an updated language access policy in place. In FY18, DCRA needs to provide agency-wide training and ensure grantees and contractors comply with language access requirements.

2/4

Accessibility

DCRA engaged diverse LEP/NEP constituents by partnering with the Mayor's constituency offices and community-based organizations. The agency has yet to translate key vital documents and make multilingual resources available on its website.

2/5

Quality

FY17 field test results indicate that only 14 out of 19 testers received language assistance. One complaint was filed against DCRA in FY17 and was withdrawn by the complainant.

899

FY17 Encounters

1194

FY16 Encounters

7 out of 8

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

7 out of 11

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

OHR credits the Department of Consumer and Regulatory Affairs (DCRA) for ongoing efforts to bring the agency into greater compliance with the Language Access Act. However, field testing scores indicate that the agency has yet to make improvements and take significant steps to address compliance goals.

In FY17, DCRA a) reported LEP/NEP encounters; b) put in place an updated language access policy, c) provided language access training to 55 employees during new employee orientation sessions; and d) participated in 11 outreach events, most of which specifically targeted Latino, African and Asian & Pacific Islander LEP/NEP communities.

While the agency has made tangible improvements in meeting preparedness requirements, key language access implementation milestones remain unachieved. OHR reiterates corrective actions recommended since FY15 as it relates to translation of vital documents, improvement of data collection strategies, and accessibility of the agency's website to LEP/NEP readers – none of which have been sufficiently addressed in DCRA's FY17 reports. OHR also notes that DCRA has not taken steps to train its grantees and contractors or provide them with technical assistance to ensure that they are fulfilling their legal obligation to provide language access to LEP/NEP customers.

OHR encourages DCRA to continue efforts to provide language proficiency testing for its bilingual staff and to recruit additional bilingual staff in FY18 as a cost-effective strategy for providing culturally and linguistically accessible services to the large population of LEP/NEP customers DCRA serves.



11/12

overall compliance score

10/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Korean, Mandarin, Chinese, Amharic

4/5

Preparedness

DDOT met FY17 reporting requirements, and provided language access training for 340 employees. Agency needs to work with grantees and contractors to ensure that they meet language access compliance requirements.

4/4

Accessibility

DDOT translated vital documents in FY17 and participated in community events to reach LEP/NEP residents. In FY18, DDOT needs to ensure access to translated documents online, and expand outreach efforts.

3/3

Quality

No language access public complaints were filed against DDOT in FY17. The agency was not tested.

271

FY17 Encounters

317

FY16 Encounters

The District Department of Transportation (DDOT) continues to demonstrate firm commitment to language access implementation. OHR credits DDOT for timely submissions of quarterly reports, and for proactive implementation and follow through on FY17/18 BLAP goals. In FY17, DDOT a) executed an aggressive training plan as a result of which a total of 340 frontline staff and managers received language access compliance training; b) translated numerous vital documents, including 4 informational flyers, FAQs, and notices which were translated into Amharic, Chinese, French, Korean, Spanish and Vietnamese; and c) participated in community events to reach LEP/NEP residents.

While DDOT submitted data on LEP/NEP encounters, OHR notes that the FY17 numbers are significantly lower than those reported in FY16. This is surprising given DDOT's recent efforts to implement new data collection mechanism intended to track encounters on a monthly basis. If this strategy was not utilized in FY17, DDOT should take steps to implement this, along with other strategies outlined in the agency's FY17/18 BLAP intended to track encounters during public outreach events and from Safety Technicians and Traffic Control Officers in the field.

In FY18, recommends that DDOT centralize translated vital documents under the "language support" section of its website, expand outreach activities to reach more diverse LEP/NEP audiences, and ensure that DDOT grantees and contractors meet language access compliance requirements. OHR also looks forward to supporting DDOT's FY18 plans to offer Spanish classes to Safety Technicians and Traffic Control Officers, and to develop an online language access training module to be used as a refresher for previously trained staff.



Department on Disability Services

11/14

overall compliance score

11/14

FY16 Score

FY17 Top Languages Encountered:

Spanish, Mandarin, Amharic, French, Arabic, Swahili, Korean, Vietnamese, Bengali

4/5

Preparedness

DDS reported data on LEP/NEP encounters, provided language access compliance training for 94 employees and met all reporting requirements. In FY18, DDS needs to train DDA staff as well as its grantees and contractors.

4/4

Accessibility

DDS translated vital documents into multiple languages, and engaged LEP/NEP customers and families. DDS can improve accessibility by revamping language access signage, and by centralizing translated documents in the language support section of its website.

3/5

Quality

No language access public complaints were filed against DDS in FY17. Two telephone testers who called the Developmental Disabilities Administration did not receive language assistance.

864

FY17 Encounters

505

FY16 Encounters

5 out of 5

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

4 out of 6

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

OHR credits the Department on Disability Services (DDS) for continuing efforts to meet the full range of language access compliance requirements. In FY17, DDS a) reported significantly more encounters with LEP/NEP customers than in FY16 using newly streamlined data collection mechanisms; b) provided language access compliance training to 94 employees and new hires; and c) hosted events and workshops targeting LEP/NEP individuals with disabilities and their families. DDS also translated 3 vital documents, including the “DDA Intake Application” which was translated into the 8 languages most encountered by DDS (Amharic, Arabic, Chinese, French, Korean, Spanish, Swahili and Vietnamese).

FY17 field testing conducted at DDS indicated that, while all 6 testers who contacted the Rehabilitation Services Administration (RSA) over the phone and in person received interpretation services, only three out of five testers who contacted the Developmental Disabilities Administration (DDA) received language assistance. DDS appears to have an efficient system for connecting customers to a telephonic interpreter. However, poor customer service on the part of DDA staff was reported during two tests – one in-person and one over the phone.

OHR requests that DDS focus FY18 training efforts on ensuring that DDA employees understand their legal obligation to provide language assistance and how to use of telephonic interpretation services to communicate with LEP/NEP customers. DDS should also take immediate steps to bring grantees and contractors into compliance in FY18, and make intentional efforts to recruit bilingual employees into public-facing positions as planned for the FY18/19 BLAP implementation period.



Department of General Services

3/12

overall compliance score

4/12

FY16 Score

1/5

Preparedness

DGS needs to take immediate steps to improve preparedness by developing a language access policy; by training staff, grantees, and contractors; and by creating a comprehensive mechanism to collect data on LEP/NEP encounters.

0/4

Accessibility

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

2/3

Quality

No complaints were filed against DGS in FY17, and the agency was not tested. Agency needs to take immediate steps to address compliance gaps.

N/A

FY17 Encounters

N/A

FY16 Encounters

The Department of General Services (DGS) has not met reporting requirements for FY17. Without reports on the agency's language access implementation efforts, OHR is unable to assess the level of service currently being provided to LEP/NEP customers encountered by the agency or by its grantees and contractors.

While DGS was only recently designated as a covered entity with major public contact in September 2014, OHR believes that the agency has had sufficient lead time to institute a reliable mechanism for meeting language access requirements. As indicated in OHR's feedback on DGS' FY17/18 BLAP, as well as in OHR's FY16 annual compliance report, DGS needs to take immediate steps to address this lag in order to bring the agency into compliance. Training of frontline staff, development of a language access policy, and recording of encounters with LEP/NEP customers are some of the critical preparedness measures that the agency needs to prioritize and tackle immediately.

OHR once again urges DGS to seek assistance and accelerate efforts to meet these goals and develop a plan for ensuring that grantees and contractors receive language access compliance training.

8/14

overall compliance score

5/14

FY16 Score

FY17 Top Languages Encountered:

Spanish, Chinese, Amharic, French,
Vietnamese, Somali

4/5

Preparedness

DHCD reported FY17 encounters with LEP/NEP customers, and trained staff on language access compliance. DHCD must take immediate steps to ensure grantee/contractors comply with language access requirements in FY18.

1/4

Accessibility

DHCD has yet to translate the agency's vital documents, upload them on the agency's website, and improve multilingual signage. The agency conducted outreach in FY17 targeting specific LEP/NEP communities.

3/5

Quality

4 out of 12 in-person tests conducted at DHCD in FY17 did not receive language assistance. No complaints were filed against the agency. DHCD has taken steps to improve language access compliance in FY7.

3,530

FY17 Encounters

N/A

FY17 Encounters

8 out of 12

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

OHR notes that the Department of Housing and Community Development (DHCD) has taken promising steps in FY17 to address the agency's ongoing challenges with language access compliance. DHCD reported encounters with LEP/NEP encounters for the first time in two years and, in the last of quarter of FY17, implemented an agency-wide data reporting tool allowing divisions to directly input data on quarterly basis. The agency also provided language access training for 65 staff, partnered with the Mayor's Offices on African and Latino Affairs to conduct outreach to LEP/NEP communities, and convened division managers and the agency's communications team to develop strategies for improving compliance in data collection, frontline staff training, and broader outreach.

OHR encourages DHCD to follow-through on these efforts and to ensure by the end of the FY17/18 BLAP period that all pending compliance requirements are met. In addition to improving the agency's data collection mechanism, DHCD needs to take immediate steps to place multilingual signage at all agency and provider locations, and translate all of the agency's vital documents. Despite repeated requests from OHR, DHCD has not translated vital documents that were prioritized as far back as FY13. Without trained frontline staff and translated documents, the agency continues to restrict the ability of LEP/NEP customers to access critical services.

FY17 field testing conducted at DHCD shows a decline in the agency's score, with only 8 out of 12 testers receiving service, as compared to FY17 results in which five out of five testers received service. Test scores also show that this decline was likely due to the additional tests conducted at DHCD provider sites that were not tested in FY16. Though staff at both of these sites assisted testers by connecting them to bilingual staff members or personal acquaintances, there is no evidence from these tests that there is a policy in place instructing staff to use telephonic or in person interpretation services.

In light of this finding, OHR urges DHCD to take immediate steps to train all providers and ensure that they are equipped to adequately serve LEP/NEP customers and to meet language access compliance requirements. As DHCD indicated in its FY17 annual report, the agency's new data collection tool should immediately be extended to providers to ensure that they can fulfill quarterly reporting requirements.



Department of Health Care Finance

9/12

overall compliance score

11/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Amharic, Mandarin, Cantonese,
French, Oromo, Arabic, Vietnamese

3/5

Preparedness

DHCF reported encounters with LEP/NEP customers, and provided 10 language access compliance trainings for staff. Agency needs to meet reporting requirements, and continue efforts to institutionalize mechanism for collecting data from providers.

3/4

Accessibility

DHCF produced over 300 translated documents, and participated in two outreach events. Agency needs to take immediate steps to centralize translated documents on its website.

3/3

Quality

No complaints were filed against DHCF in FY16, and the agency was not tested. Agency has shown improvements and needs to continue efforts to address outstanding compliance gaps in FY18.

516

FY17 Encounters

1,994

FY16 Encounters

OHR credits the Department of Health Care Finance (DHCF) for making a significant investment in FY17 to translate a wide range of vital documents - from notices, and application forms, to flyers and programmatic fact sheets - producing a total of over 300 translated documents. OHR particularly applauds DHCF for translating 5 documents pertaining to a new program into the top 19 languages spoken by its customers, greatly improving accessibility of its services and programs to an even wider LEP/NEP audience. Other FY17 accomplishments include 10 language access compliance trainings provided to 107 employees, and the agency's participation in two community events to engage LEP/NEP residents.

While DHCF successfully met translation and training requirements in FY17, a number of preparedness and accessibility requirements highlighted in DHCF's FY16 compliance report and its FY17/18 BLAP remain unaddressed. DHCF has yet to create a "language support" section on the DHCF website to organize translated documents by language. Considering the large number of newly translated vital documents, it is imperative that the agency create an identifiable location with in-language links to translated documents, without which LEP/NEP readers will not be able to navigate the agency's website.

Other compliance requirements DHCF needs to meet in FY18 include: a) developing a comprehensive language access policy to be submitted to OHR for review, b) accelerating grantee/provider compliance efforts and implementing a data collection mechanism allowing providers to report their encounters with LEP/NEP customers, and c) more consistently meeting reporting requirements.

8/14

overall compliance score

8/14

FY16 Score

FY17 Top Languages Encountered:

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

3/5

Preparedness

DHS reported LEP/NEP encounters at the agency and with grantees, and provided language access training to staff in FY17.

3/4

Accessibility

DHS conducted targeted outreach to engage LEP/NEP communities and produced 74 vital documents in 6 different languages. Translated documents are still not centralized on the DHS website, and a language support page is not available.

2/5

Quality

Six public complaints were filed against DHS in FY17. 4 out of 15 telephone tests and 2 out of 19 in person tests did not receive language assistance.

43,507

FY17 Encounters

63,250

FY16 Encounters

17 out of 19

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

11 out of 15

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

OHR credits the Department of Human Services (DHS) for ongoing efforts to strengthen the agency's language access program. In FY17, DHS reported taking steps to improve compliance by a) enhancing multilingual signage in service centers displaying information and directions to LEP/NEP customers in Spanish, Amharic, French and Chinese; b) certifying language proficiency of 55 bilingual staff and adopting a new policy formalizing the role of bilingual staff in the agency; c) producing 74 translated vital documents (28 in Spanish, 18 in Amharic, 15 in Chinese, 8 in French, 3 in Korean, and 2 in Vietnamese), and d) putting in place a Language Access Advisory Group and center-specific Ombudsman to help prevent and address barriers LEP/NEP may face in accessing DHS services.

OHR also notes that DHS received improved scores on FY17 telephone test results, provided interpretation services for all in-person and telephone testers conducted at the H Street Service Center, and implemented a multilingual automated menu system for LEP/NEP callers.

While DHS' FY17 test scores show an improvement compared to FY16 results, they also reveal that training efforts need to continue to ensure that all DHS staff – across centers, programs, and provider sites – are fully equipped and aware of their legal obligation to provide language assistance to customers. In 4 out of 15 telephone tests that did not receive language assistance, DHS employees acknowledged testers' request for interpretation services but did not know how to access an interpreter over the phone. Whereas in the 2 out of 19 in person tests during which language assistance was not provided, employees did not take any steps to respond to testers' request for interpretation. Test results also indicate that while the automated menu in multiple languages enhances accessibility, LEP/NEP callers have to wait to speak to an English-speaking employee before accessing an interpreter.

A total of 6 language access public complaints were filed against DHS in FY17. Given trends observed over the years, this is a significantly high number of complaints to be filed against a single agency in a year. OHR therefore urges DHS to increase efforts to close compliance gaps, ensure that the systems being put in place to eliminate barriers are fully operationalized, and closely examine root causes of barriers experienced by LEP/NEP customers.

Finally in FY18, OHR requests that DHS upload translated documents to its website, create a language support section, and develop a more robust data collection system which includes a system for tracking bilingual staff encounters with LEP/NEP customers. Given the large number of bilingual staff now officially serving in public facing roles the language assistance they provide is not being recorded. While the agency indicated that a new data collection strategy has been implemented, OHR notes that the agency reported roughly 20,000 less encounters in FY17 than were reported in



District of Columbia Department of Motor Vehicles

8/14

overall compliance score

8/14

FY16 Score

FY17 Top Languages Encountered:

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

4/5

Preparedness

DMV reported encounters with LEP/NEP customers, and trained new hires on language access compliance. Agency needs to meet reporting requirements more consistently.

3/4

Accessibility

DMV translated 24 vital documents and provides access to translated materials on its website. Agency needs to improve signage and conduct outreach to LEP/NEP populations.

1/5

Quality

4 out of 20 in-person testers did not receive language assistance. 9 public complaints were filed against DMV in FY17. Agency needs to take proactive steps in FY18 to address ongoing compliance gaps.

6,993

FY17 Encounters

5,697

FY16 Encounters

16 out of 20

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

OHR credits the Department of Motor Vehicles (DMV) for reporting comprehensive data on encounters with LEP/NEP customers, for providing language access compliance training to 55 new hires, and for translating 24 vital documents (9 into Spanish, and 3 into Amharic, Chinese, French, Korean and Vietnamese each).

FY17 in-person field testing results conducted at DMV locations indicated that interpretation services were provided during 16 out of 20 tests (80%). While scores declined as compared to FY16 results in which 19 out of 20 testers received services, FY17 testers who received interpretation services reported that DMV employees promptly accessed Language Line Solutions through dual handset phones dedicated to interpretation services.

These results suggest that the DMV has established an efficient system to provide interpretation services. However, two testers were refused service, and one tester reported poor customer service on the part of a DMV employee. Additionally, a total of 9 language access public complaints were filed against the DMV in FY17, the largest number of complaints filed against a single agency in one year. OHR urges DMV to take drastic steps to eliminate the barriers preventing LEP/NEP customers from accessing services, and intensify training and monitoring efforts in FY18 to ensure that all employees consistently comply with their obligation to provide language assistance.

In addition to addressing ongoing concerns with the quality of services provided to LEP/NEP customers, OHR requests that the agency work to immediately comply with outreach requirements, and follow through on plans to improve signage, recruit bilingual staff, revise agency's language access training curriculum, and update its policy. Finally, OHR once again urges the DMV to comply with reporting requirements, and ensure that FY18 quarterly reports are submitted in a comprehensive and timely



District of Columbia Department of Corrections

9/12

overall compliance score

9/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Pashto, Tigrinya, Turkish, Hungarian, Amharic, French, Farsi, Hindi, Russian

3/5

Preparedness

DOC provided data on LEP/NEP encounters and met reporting requirements. However, DOC did not provide language access training to staff or to its providers in FY17. The agency needs to update its language access policy in FY18.

4/4

Accessibility

DOC translated 7 vital documents into Spanish, uploaded documents on its website, displayed appropriate language access signage, and engaged the public using multilingual outreach

2/3

Quality

DOC was not tested in FY17, and no complaints were filed against the agency. Agency needs to make improvements to address chronic compliance gaps.

398

FY17 Encounters

532

FY16 Encounters

OHR credits the Department of Corrections (DOC) for making promising efforts to meet accessibility requirements and improve language access services for LEP/NEP residents of facilities and members of the public. One noteworthy achievement is the placement of a prominent tab on DOC's website, labeled "en Español", which provides links to all vital documents available in Spanish. The agency also reported hiring bilingual staff in FY17 to alleviate communication challenges faced inside the jails.

DOC improved accessibility of its services by a) displaying appropriate multilingual signage at public facing locations; b) translating 7 vital documents - forms, informational posters and event flyers - into Spanish; and c) making efforts to reach LEP/NEP stakeholders through various community events. However OHR notes that DOC has yet to address a number of vital compliance gaps in regards to data collection, language access training, and translation of vital documents into additional languages beyond Spanish.

While DOC reported 398 LEP/NEP encounters and 118 LEP/NEP inmates tracked through its customer tracking software, the agency has failed to take action on OHR's repeated recommendations to develop a robust data collection mechanism. Training of frontline staff remains a major area of concern as no steps were taken in FY17 or FY16 to train frontline staff on language access requirements and resources. Despite repeated instructions from OHR and the agency's FY17/18 BLAP commitment to implement agency-wide training by the end of FY17, DOC reports indicate that language access training has not been provided to date.

OHR urges DOC to take immediate steps to address these gaps. Considering that DOC now has oversight of the Correctional treatment Facility and manages the Central Detention Facility, the agency needs to allocate significant time, attention, and resources to fulfill its language access obligations.

12/12

overall compliance score

12/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Amharic, Korean, Vietnamese, Mandarin, Chinese Tigrinya, Cantonese, Farsi, Japanese

5/5

Preparedness

DOEE has met all preparedness requirements and is fully equipped to provide meaningful access to LEP/NEP customers. DOEE grantees and contractors have also been trained on their legal obligation to provide language access.

4/4

Accessibility

DOEE conducted targeted outreach, translated vital documents into multiple languages, and placed new multilingual signs in public-facing locations. DOEE needs to improve accessibility of translated vital documents on its website.

3/3

Quality

No field tests were conducted at DDOE in FY17, and no complaints were filed against the agency. Agency continues to make exceptional efforts to meet all language access compliance requirements.

487

FY17 Encounters

2512

FY16 Encounters

The Department of Energy and Environment (DOEE) continues to meet the full range of language access implementation requirements and model best practices for providing equitable services to LEP/NEP constituents.

In FY17, DOEE once again fulfilled all reporting requirements in a timely manner, and provided comprehensive data on LEP/NEP encounters by combining encounters manually tracked by bilingual staff, grantees, and contractors with the number of LEP/NEP individuals identified in agency's customer tracking system and on sign-in sheets. Furthermore, DOEE successfully implemented a rigorous language access training plan by providing orientation for new hires; refreshers for previously trained employees; and language access compliance and reporting training for 13 grantees and contractors. To assist grantees and contractors beyond the training, DOEE also provided further technical assistance and support to ensure that they have the tools and resources they need to comply with language access requirements.

Following through on FY17/18 BLAP plans to translate vital documents into top languages encountered by the agency, DOEE translated 35 documents into Amharic (6), Chinese (5), French (4), Korean (6), Mandarin (1), Spanish (9), and Vietnamese (3). Many of these documents were used by DOEE units like the Air Quality Division which engaged Korean-owned dry cleaners and construction workers about local laws and safe practices. Another FY17 accomplishment is that DOEE placed large multilingual banners at all DOEE locations to inform LEP/NEP customers of their right to interpretation and translation services.

As the agency continues to tackle outstanding FY17/18 BLAP action items in FY18, OHR encourages DOEE to a) collaborate with the Mayor's Ethnic Constituency Offices to extend its reach into linguistically diverse LEP/NEP residents and businesses; b) make its website more accessible to LEP/NEP readers and organize public-facing translated documents by language under the 'language support' section of the website; c) expand its current pool of 3 certified Spanish-speaking staff by recruiting additional bilingual staff into public-facing positions that stand to benefit from added linguistic skills and cultural competence, and d) update its language access policy to reflect grantee and contractor language access responsibilities.



Department of Employment Services

9/14

overall compliance score

8/14

FY16

FY17 Top Languages Encountered:

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

5/5

Preparedness

DOES reported LEP/NEP encounters, met reporting and planning requirements, trained senior staff and grantees. Agency needs to take immediate steps to train frontline staff and update its language access policy.

2/4

Accessibility

DOES translated 73 vital documents; displayed appropriate signage in public facing locations; and made efforts to reach LEP/NEP populations. In FY18, the agency needs to upload translated documents in the "language support" section of the agency's website.

2/5

Quality

One public complaint was filed against DOES in FY17, and 10 out of 13 telephone field testers did not receive language assistance. DOES has taken steps to improve compliance in FY17.

5,394

FY17 Encounters

4,812

FY16 Encounters

3 out of 13

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

OHR applauds the Department of Employment Services (DOES) for hiring a full time Language Access Coordinator dedicated to overseeing the agency's language access implementation efforts. Since the agency took this step, OHR has observed promising strides toward bringing the agency into greater compliance with the Language Access Act.

In FY17, DOES a) instituted a new data collection mechanism for tracking data on LEP/NEP encounters; b) produced 73 translated vital documents in Spanish (55), Chinese (5), Korean (5), Vietnamese (5), Amharic (1), French (1) and Arabic (1); c) trained the agency's senior staff and training team on language access compliance requirements; d) revised the agency's existing memorandums of understanding with partners and grantees to reflect language access obligations; e) trained 3 of its grantees on language access compliance and reporting requirements; and f) participated in community events specifically targeting LEP/NEP populations by partnering with the Mayor's Ethnic Constituency Offices.

While OHR applauds these efforts, FY17 field testing results raise serious concerns and indicate that LEP/NEP customers are currently being denied language assistance and equitable access to DOES services. Only 3 out of 13 – or 23% of telephone testers who called DOES American Job Centers and the Offices of Wage and Hour and of Worker's Compensation received interpretation services. Multiple testers rude and poor customer service from DOES employees.

In light of these results, which are similar to FY16 results, OHR urges DOES to immediately provide rigorous language access training for all DOES frontline staff. The agency should also update its language access policy to clarify guidelines for providing language assistance over the phone and disciplinary action for employees who fail to comply.

As the agency continues efforts to address compliance gaps, OHR also recommends that DOES a) include data from grantees and contractors as part of the agency's reports on LEP/NEP encounters; b) expand outreach and translation of vital documents to better target the District's Asian and African LEP/NEP populations; and c) ensure that translated documents are accessible and organized by language in the 'language support' section of the agency's website.

11/14

overall compliance score

2/14

FY16 Score

FY17 Top Languages Encountered:

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

5/5

Preparedness

DOH met reporting requirements, provided comprehensive data on LEP/NEP encounters, and trained 528 employees and grantees. The agency has an updated language access policy in place.

3/4

Accessibility

DOH translated 45 vital documents, conducted outreach to diverse LEP/NEP communities in FY17, and displayed appropriate multilingual signage. DOH needs to improve accessibility of translated documents on its website.

3/5

Quality

FY17 testing results indicate that 9 out of 12 telephone testers and 2 out of 8 in-person testers were turned away. No public complaints were filed against DOH in FY17. The agency made significant efforts to close compliance gaps in FY17.

30,793

FY17 Encounters

26,150

FY16 Encounters

6 out of 8

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

3 out of 12

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

OHR credits the Department of Health (DOH) for making significant strides in FY17 toward meeting language access implementation requirements, and for proactively addressing longstanding compliance gaps. DOH met all reporting requirements in FY17 and provided robust updates detailing efforts made by the agency's divisions and provider organizations to meet the requirements of the Language Access Act.

In FY17, DOH met key preparedness compliance areas by a) reporting comprehensive data on LEP/NEP encounters based on usage of telephonic and in-person interpretation services as well as bilingual staff and grantee reports; b) training 528 employees on language access compliance obligations and resources through 15 training events held throughout the fiscal year; and c) certifying, training, and supporting its network of service providers to ensure that they are equipped to provide language assistance to LEP/NEP customers.

DOH also improved accessibility of its services and programs by translating 45 informational vital documents into Spanish (23), Amharic (11), French (4), Chinese (4), Vietnamese (2), and Portuguese (1); by participating in over 19 community-based events to engage diverse LEP/NEP residents; and by displaying multilingual signage in DOH's public-facing locations including the Vital Records Division, the Professional Licensing Division, and the Wellness Center.

While FY17 field testing results do show a slight improvement as compared to FY16 results, they signal a need for even more vigilant efforts to ensure that LEP/NEP customers are not denied access. Though interpretation was provided in 6 out of 8 in-person tests (75%), interpretation was only provided in only 3 out of 12 telephone tests (25%). These results indicate that the agency - along with its network of grantees and contractors - need to provide further training to ensure that all frontline staff are trained and equipped to provide interpretation services, particularly over the phone.

In addition to developing an aggressive language access compliance training plan for FY18, OHR recommends that DOH improve accessibility of its website to LEP/NEP readers by uploading translated documents onto the language-specific "language support" section of the website (and not by embedding them inside the English content). OHR also urges DOH to recruit and certify bilingual staff in key public-facing positions to build the agency's cultural and linguistic competency and its capacity to equitably serve diverse LEP/NEP customers.

10/14

overall compliance score

10/14

FY16 Score

FY17 Top Languages Encountered:

Spanish, Arabic, Portuguese, Russian

4/5

Preparedness

DPR met reporting requirements and trained 28 employees. However agency needs to provide agency-wide training to ensure that frontline employees are prepared to serve LEP/NEP customers. The agency needs to also update its language access policy.

4/4

Accessibility

DPR enhanced language access signage, translated vital documents into multiple languages, and conducted proactive outreach to engage diverse LEP/NEP populations.

2/5

Quality

No complaints were filed against DPR in FY17.
5 out of 7 telephone testers were denied language assistance during FY17 field tests.

1,781

FY17 Encounters

1,150

FY16 Encounters

2 out of 7

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

OHR credits the Department of Parks and Recreation (DPR) for ongoing language access implementation efforts in FY17. The agency met important accessibility requirements by placing prominent multilingual banners at five public facing locations to welcome LEP/NEP customers in their language and inform them of their right to receive language assistance. OHR also commends DPR for proactive efforts over the last three years to recruit bilingual staff into public facing positions, and for partnering with community-based organizations and the Mayor's Offices on African, Asian and Pacific Islander and Latino Affairs to develop culturally and linguistically targeted programming and increase participation of LEP/NEP residents in DPR programs. DPR's 2nd Annual Taste of the World Festival is one great example of such multilingual community engagement efforts. In FY17, DPR also translated 7 vital documents - such as camp enrollment forms and promotional materials - into Spanish, and provided the application for reduced rates on its website in Spanish, Amharic, Chinese, French, and Vietnamese.

FY17 field testing results indicate only 2 of the 7 telephone testers who called DPR's customer service office and recreation centers were able to receive language assistance. In three out of seven tests, an agency employee refused to provide interpretation services and hung up on the tester. Though DPR's testing score improved from FY16 —when it provided interpretation to 0 out of 8 testers—the agency still received one of the two lowest scores of all tested agencies in FY17.

While DPR reports that 28 employees were trained in FY17, the agency has not provided agency-wide training for frontline staff since FY14. OHR once again urges DPR to take immediate steps to address this gap by training all frontline staff in language access compliance requirements to ensure that they are equipped to serve LEP/NEP customers. Agency-wide training needs to be delivered by the end of the 3rd quarter of FY17.



Department of Public Works

12/14

overall compliance score

9/14

FY16 Score

FY17 Top Languages Encountered:

Spanish, French, Chinese, Italian, Bengali, Vietnamese

4/5

Preparedness

DPW reported data on LEP/NEP encounters, and trained frontline staff on language access compliance requirements. Agency needs to ensure grantees and contractors are in compliance with language access requirements.

3/4

Accessibility

DPW translated vital documents into Spanish, uploaded translated documents to the DPW website, and conducted outreach. Agency needs to improve signage and translate documents into additional languages.

5/5

Quality

No complaints were filed against the agency in FY17. All five telephone testers who called DPW units received language access. Agency has shown significant improvement in language access implementation due largely to agency-wide training.

328

FY17 Encounters

202

FY16 Encounters

5 out of 5

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

OHR congratulates the Department of Public Works (DPW) on FY17 excellent field testing results indicating that all five testers who contacted the agency received prompt interpretation services through Language Line Solutions. OHR notes that DPW went from receiving the lowest possible score for language access in FY16 to the highest possible score in FY17. Given the aggressive agency-wide training conducted at DPW in FY16, this outcome suggests that DPW has effectively eliminated barriers for LEP/NEP customers by training and equipping frontline employees with the tools they need to serve LEP/NEP customers.

In FY17, DPW a) reported data on LEP/NEP encounters which included a tally of the interactions in which bilingual staff directly assisted LEP/NEP customers; b) translated 7 vital documents into Spanish and uploaded many of them on the DPW website; c) conducted outreach to the Latino community to reach LEP/NEP residents, and d) trained 44 employees on language access compliance.

In FY18, DPW needs to expand outreach to engage diverse LEP/NEP communities in the District, and follow through on FY17/18 BLAP goals to provide linguistically targeted workshops for LEP/NEP business owners in Wards 5 and 7. The agency also needs to translate vital documents into additional languages and ensure that language access signage is prominently displayed at all public facing locations, and train grantees and contractors to ensure they fulfill their language access compliance obligations. Finally, OHR once again requests that DPW take steps to certify bilingual staff in frontline positions to assess language proficiency and ensure they are fully qualified to communicate with LEP/NEP customers in their language.

3/14

overall compliance score

6/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Vietnamese

0/5

Preparedness

DSLBD failed to comply with FY17 reporting and training requirements. Agency needs to take immediate steps to ensure that it is prepared to serve LEP/NEP customers.

1/4

Accessibility

DSLBD headquarters displayed appropriate language access signage. However, the agency failed to report on FY17 efforts to translate vital documents, conduct outreach to LEP/NEP communities, and provide translated documents on

2/5

Quality

No language access public complaints were filed against DSLBD in FY17. However none of the 5 telephone testers who contacted the agency received language assistance.

N/A

FY17 Encounters

114

FY16 Encounters

0 out of 5

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

OHR has not received FY17 implementation reports from the Department of Small and Local Business Development (DSLBD) and is unable to assess steps taken by the agency to address longstanding gaps in language access compliance. While DSLBD submitted a Biennial Language Access Plan (BLAP) for the FY17/18 implementation period, the agency has since not provided the required quarterly reports or followed up on meeting requests made by OHR.

FY17 field testing conducted at DSLBD indicates that none of the five testers who contacted the agency over the phone received interpretation services. Multiple testers reported that agency employees acknowledged the need for interpretation services but were unsuccessful in using the Language Line Solutions to reach a telephonic interpreter. Given these results and the lack of follow through on OHR recommendations over the last two years, OHR demands that the agency take immediate steps to meet with OHR's Language Access Program and develop an action plan for tackling requirements set forth by the Language Access Act for covered entities with major public contact.

As it stands, DSLBD is out of compliance as it relates to all preparedness, accessibility and quality requirements and needs to address the full range of requirements to ensure that the agency is capable of serving LEP/NEP customers.



Department of Youth Rehabilitation Services

11/12

overall compliance score

10/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Tigrinya

5/5

Preparedness

DYRS reported LEP/NEP encounters in FY17, provided language access compliance training for frontline staff, and engaged contractors to ensure that they comply with the Language Access Act.

3/4

Accessibility

DYRS met language access signage requirements and engaged LEP/NEP youth. Agency's vital documents were translated in FY16. In FY18, DYRS needs to finalize development of a language support section on its website.

3/3

Quality

No language access public complaint was filed against DYRS in FY17. The agency was not tested in FY17. DYRS continues to show improvements in language access implementation.

128

FY17 Encounters

150

FY16 Encounters

OHR applauds the Department of Youth Rehabilitation Services for taking consistent steps since its 2014 designation as an entity with major public contact to meet language access compliance requirements. In FY17, DYRS a) met reporting requirements; b) provided data on encounters with LEP/NEP customers; c) trained a total of 254 employees, including contractors, on language access compliance requirements; d) met language access signage requirements; and d) informed youth under its custody and their families on their right to language assistance.

With a comprehensive language access policy in place, and proactive efforts to ensure that the agency's contractors meet their obligation under the Language Access Act, DYRS is fully prepared to serve LEP/NEP customers.

In FY18, OHR looks forward to the complete implementation of agency's plans to develop supplemental online training module for language access compliance, and to centralize translated documents under a "language support" section on the agency's website. OHR also encourages DYRS to certify its bilingual staff by providing language proficiency testing to verify that they have sufficient language skills to provide assistance to LEP/NEP customers in their language.



DC Fire and Emergency Medical Services

11/12

overall compliance score

6/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Arabic, Amharic, French, Mandarin, Russian, Cantonese, Korean, Vietnamese, German

5/5

Preparedness

FEMS met all reporting requirements in FY17; provided data on LEP/NEP encounters; trained all public contact staff; and adopted a comprehensive language access policy.

4/4

Accessibility

FEMS translated 14 vital documents in FY17 and engaged LEP/NEP communities through targeted outreach activities and recruitment efforts.

2/3

Quality

Two language access public complaints were filed against FEMS in FY17. The agency was not tested in FY17. FEMS showed significant improvements in language access implementation in FY17.

1,692

FY17 Encounters

47

FY16 Encounters

OHR applauds the DC Fire and Emergency Medical Services (FEMS) for taking significant measures in FY17 to improve language access implementation and meet the requirements of the Language Access Act.

In FY17, FEMS reported significantly higher encounters with LEP/NEP customers reached through walk-ins, emergency response, and outreach and education efforts. This increase in LEP/NEP encounters indicates wider usage of telephonic interpretation services and suggests that newly developed data collection mechanisms are effectively capturing the agency's encounters.

FEMS also utilized multiple strategies to provide agency-wide language access compliance training in FY17. The agency a) distributed language identification posters, telephonic interpretation usage instructions, and language access booklets to all department sites, apparatus, and cell phones used by first responders; b) provided language access compliance training to all public contact employees through an online module; c) conducted in person training to 129 new recruits; d) trained 25 Deputy Fire Chief Shift Supervisors on language access compliance; and e) provided additional in-person training for the frontline staff in the Fire Prevention Unit.

Additionally, FEMS translated 14 vital documents into different languages, including an informational flyer that was translated into Spanish, Amharic Chinese and French; and participated in numerous outreach events specifically targeting LEP/NEP residents.

OHR congratulates FEMS on these achievements and encourages the agency to sustain this level of compliance moving forward. In FY18, OHR recommends that FEMS centralize all translated vital documents under the "language support" section of the agency's website.



Homeland Security and Emergency Management Agency

11/12

overall compliance score

8/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, French, Arabic, German, Korean, Amharic, Mandarin, Portuguese, Vietnamese, Ancient Greek

5/5

Preparedness

HSEMA reported LEP/NEP encounters in FY17; trained all staff on language access compliance; and has a language access policy in place.

3/4

Accessibility

HSEMA conducted extensive outreach to LEP/NEP communities in FY17 and translated 14 vital documents into multiple languages. HSEMA needs to improve accessibility of its website and create a "language support" feature.

3/3

Quality

No public complaints were filed against HSEMA in FY17. The agency was not tested in FY17. HSEMA made significant efforts to meet language access compliance requirements in FY17.

153

FY17 Encounters

194

FY16 Encounters

OHR credits the Homeland Security and Emergency Management Agency (HSEMA) for ongoing efforts to meet the requirements of the Language Access Act. In FY17, HSEMA a)

translated numerous vital documents, including its new "Ready DC" emergency preparedness brochure, and website into 6 languages; b) conducted outreach to provide multilingual emergency preparedness information to LEP/NEP residents by partnering with the Mayor's Office on Latino Affairs; c) and delivered language access compliance training during the agency's mandatory all staff meeting. Additionally, HSEMA took steps in FY17 to improve the agency's data collection efforts by creating a new tool bilingual employees can use to track encounters with LEP/NEP customers.

OHR applauds HSEMA for these achievements and for the steady efforts the agency is making to address compliance gaps. In FY18, OHR once again requests that HSEMA follow through on past recommendations to create a "language support" section on its website to ensure that LEP/NEP readers can access critical information in their language. As of yet, HSEMA's website does not contain a description of the agency's programs and services in different languages.

In addition to creating a new tool for tracking bilingual staff interactions with LEP/NEP customers, HSEMA needs to further improve data collection mechanisms and identify additional strategies for documenting LEP/NEP encounters. Considering the agency's citywide presence, and the number of targeted outreach efforts reported, LEP/NEP encounters reported in FY17 appear low. In FY18, OHR looks forward to seeing the outcome of the new tracking tool used by bilingual staff and additional methods implemented to better capture the agency's interactions with LEP/NEP customers.



DC Metropolitan Police Department

12/14

overall compliance score

9/14

FY16 Score

FY17 Top Languages Encountered:

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

4/5

Preparedness

MPD reported comprehensive data on FY17 LEP/NEP encounters; trained 4th District Station employees; and adopted a language access policy. In FY18, MPD needs to provide comprehensive agency-wide language access compliance

4/4

Accessibility

MPD conducted extensive outreach in FY17; translated 8 vital documents; and placed translated documents on the agency's website. MPD can improve accessibility by organizing translated documents by language in the "language support" section of the website.

4/5

Quality

One language access complaint was filed against MPD in FY17. The agency received a perfect score in FY17 testing and provided language assistance to all 8 testers. MPD has made improvements in language access implementation in FY17.

4,996

FY17 Encounters

5,195

FY16 Encounters

8 out of 8

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

OHR congratulates the DC Metropolitan Police Department (MPD) on once again receiving a perfect score on field testing conducted at three District stations. All in person testers who visited the Fourth, Fifth and Sixth District Stations received interpretation services and appropriate information.

MPD's FY17 reports indicate that the agency a) reported comprehensive data on encounters with LEP/NEP individuals; b) translated 8 vital documents including notices and informational flyers into up to 6 languages; b) participated in 92 community events throughout the District targeting various immigrant communities; and c) provided language access compliance training to 4th District Substation during roll call and refresher training to select staff; d) updated MPD's website to include a dedicated tab centralizing translated vital documents in 6 languages; and e) updated the agency's internal language access policy and special order to provide additional guidance on language access implementation.

OHR commends the achievements of MPD's Language Access Program over the course of FY17. As the agency continues efforts to meet the full range of Language Access Act requirements, OHR urges MPD to prioritize comprehensive agency-wide training, and improve its accessibility by placing translated documents in the "language support" section of the agency's website, and by enhancing language access signage displayed in public facing locations.

While MPD has taken steps in FY17 to train select staff and develop a training video, the agency has not fully implemented repeated requests from OHR to provide agency-wide language access training. As it stands, MPD officers and public contact staff as a whole have not yet received in depth language access training. OHR urges MPD to take immediate action in FY18 to address this gap in compliance to ensure that the agency is fully equipped to meet the needs of LEP/NEP members of the public.

In addition, MPD needs to take steps to enhance language access signage displayed at public-facing locations to better inform LEP/NEP individuals about their right to obtain assistance in their language. While MPD has met this compliance requirement in the past, test results indicated that signage was not always visibly displayed in tested locations. Finally, OHR recommends that MPD place translated documents under the language-specific tabs in the "language support" feature already available on the agency's website. LEP/NEP readers will not be able to navigate content in English and to identify the "translated documents" tab.



12/12

overall compliance score

12/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Amharic, Tigrinya, Korean, Mandarin, Cantonese, French, Bengali, Indonesian

5/5

Preparedness

CSSD provided comprehensive data on LEP/NEP encounters in FY17; trained employees; updated its language access policy; and worked with contractors to ensure they meet language access compliance requirements.

4/4

Accessibility

CSSD translated vital documents; monitored availability of language access signage; and disseminated information on its services through the Mayor's Offices on Latino, Asian and Pacific Islander, and African Affairs. Agency provides translated documents on its website but needs to centralize them in a "language support" section in FY18.

3/3

Quality

No language access public complaints were filed against CSSD in FY17. Agency was not tested in FY17. CSSD made remarkable efforts to strengthen language access implementation in FY17.

1,688

FY17 Encounters

1,451

FY16 Encounters

OHR congratulates the Office of Attorney General's Child Support Services Division (CSSD) on outstanding implementation of language access compliance requirements throughout FY17, and on sustaining a strong commitment to serving LEP/NEP customers.

In FY17, CSSD a) translated vital and case-specific documents; b) provided language access compliance training to 38 employees who did not previously receive training; c) adopted a revised language access policy updated to reflect grantee and contractor compliance responsibilities; and d) engaged contractors who provide services to the public to ensure that they meet training and quarterly data reporting requirements.

CSSD also promoted its programs and services as well as job openings through the Mayor's Office on Latino, Asian and Pacific Islander, and African Affairs, and took steps to ensure proper display of language identification posters and signage across public facing locations including in customer waiting rooms, interview rooms, and the agency's mobile van. The agency also monitored wait times for the Customer Call Center for Spanish speakers and noted that the average wait time to receive language assistance decreased from an average of 3 minutes in the first quarter of FY16 to 1 second in the first quarter of FY17.

Finally, CSSD published an article on the agency's language access implementation efforts in the agency's newsletter, successfully submitted an article about CSSD's language access practices to the Federal Child Support newsletter by the US Department of Health and Human Services which was published and distributed nationally in September, 2017.

OHR applauds CSSD for going above to meet the requirements of the Language Access Act, and for sustaining achievements through ongoing monitoring and improvements. In FY18, OHR recommends that CSSD continue efforts to ensure that contractors fully meeting language access requirements, and create a 'language support' section on the division's website to centralize all public-facing translated documents.



Office of Administrative Hearings

12/12

overall compliance score

11/12

FY16 Score

FY17 Top Languages Encountered:

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

5/5

Preparedness

OAH reported comprehensive data on FY17 encounters with LEP/NEP customers and fully met training and reporting requirements.

4/4

Accessibility

OAH translated inserts into Spanish, Amharic, and Chinese; included multilingual taglines in all orders sent to litigants; and uploaded translated documents on the agency's website.

3/3

Quality

No language access public complaints were filed against OAH in FY17. The agency was not tested. OAH continues to demonstrate exceptional commitment to meet language access compliance requirements

1,352

FY17 Encounters

302

FY16 Encounters

OHR congratulates the Office of Administrative Hearings (OAH) on another successful year during which the agency went above and beyond to meet all language access compliance requirements and effectively serve LEP/NEP litigants.

In FY17, OAH reported comprehensive data on LEP/NEP encounters which relied on reports from bilingual staff, use of in-person interpreters and telephonic interpretation services. The agency also reported utilizing a new data collection mechanism which has been vetted and institutionalized. OAH's FY17 reports also indicate that the agency a) provided language access compliance training for new hires and employees who did not participate in agency-wide training in FY16; b) translated multilingual inserts for cases and included tailored multilingual taglines in court order documents; and c) included multiple links on OAH's website for accessing translated documents in Spanish, Amharic, and Mandarin.

Additional steps the agency has taken to institutionalize a strong language access program include, designating two bilingual frontline employees (Spanish-speaking and Amharic-speaking) in the Resource Center to assist litigants; creating a quality control mechanism by which translated documents are periodically audited; and cross-training of Language Access Coordinators to ensure language access knowledge and responsibilities are shared within the agency. OHR applauds OAH's exceptional commitment to language access and notes that the agency's best practices can inform language access implementation across District government agencies.

In FY18, OHR recommends that OAH enhance accessibility of the agency's website by centralizing translated documents under the "language support" section, and by ensuring that document titles are written in the language that the document has been translated into, instead of in English.

4/12

overall compliance score

5/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Amharic and Russian

1/5

Preparedness

OCP failed to meet reporting and training requirements in FY17 and did not provide data on LEP/NEP encounters in FY17. Agency needs to take immediate action to train all public contact staff and establish a data collection mechanism in FY18.

1/4

Accessibility

OCP displayed appropriate language access signage and has a 'language support' section on its website but reported no vital document translations or outreach efforts in FY17.

2/3

Quality

No language access public complaints were filed against the OCP in FY17. The agency was not tested in FY17. OCP is currently not in compliance with the requirements of the Language Access Act.

11

FY17 Encounters

9

FY16 Encounters

OHR has not received FY17 implementation reports from the Office of Contracting and Procurement (OCP) and is unable to assess steps taken by the agency to address long standing gaps in language access compliance.

OCP has a comprehensive Biennial Language Access Plan (BLAP) in place which outlines the agency's plan to address compliance gaps within the FY17/18 implementation period. However, the agency has not provided quarterly reports or responded to follow up emails sent by OHR to remind the agency about its reporting obligations. OCP is therefore currently not in compliance with the Language Access Act and has not demonstrated that it has sufficiently met preparedness, accessibility and quality requirements.

Language Line usage reports obtained by OHR indicate that OCP staff used telephonic interpretation services to communicate with LEP/NEP customers in Spanish, Russian, and Amharic. While OCP states that the agency does not interface with LEP/NEP customers, OHR once again notes that without trained public contact staff the agency remains unequipped to appropriately respond to any level of interaction with LEP/NEP customers. The agency should translate vital documents and reach out to LEP/NEP populations in order to ensure that the agency's services, workshops, and programs are accessible to LEP/NEP individuals seeking to participate in business opportunities with District government.

As noted in the agency's FY15 and FY16 compliance assessment, OHR urges OCP to take immediate action to bring the agency into compliance by: a) training all public contact staff on language access compliance requirements; b) establishing a reliable data collection mechanism to track encounters with LEP/NEP customers; and c) translating vital documents prioritized in the agency's FY17/18 BLAP; and d) developing and disseminating an internal language access policy.



10/12

overall compliance score

5/12

FY16 Score

FY17 Top Languages Encountered:

Chinese, Korean, Spanish, Amharic

4/5

Preparedness

OP reported data on LEP/NEP encounters in FY17; trained 19 employees on language access compliance; and adopted a new language access policy. In FY18, OP needs to ensure that all frontline employees receive language access compliance training.

3/4

Accessibility

OP conducted targeted outreach in FY17 to increase participation of Spanish-speaking LEP/NEP communities in 'Plan DC' and translated vital documents. In FY18, OP needs to expand outreach efforts and upload translated documents on the agency's website.

3/3

Quality

No public complaint was filed against OP in FY17. The agency was not tested in FY17. OP has made significant improvements in language access compliance in FY17.

12

FY17 Encounters

1

FY16 Encounters

OHR credits the Office of Planning (OP) for taking steps in FY17 to improve implementation of language access requirements and for conducting linguistically targeted outreach to solicit input from LEP/NEP individuals to inform updates to the District's Comprehensive Plan.

In FY17, OP a) provided refresher language access compliance training for 19 public contact staff; b) translated 7 vital documents into Spanish; c) adopted a new language access policy; d) ensured that language access signage is displayed at the agency's reception desk; and e) participated in community events targeting the District's Asian and Latino populations.

In an effort to engage LEP/NEP residents in 'Plan DC' - a project amending the District's Comprehensive Plan - OP translated the project brochure and community meeting flyer into Spanish. OP also placed ads in Spanish on 15 buses, in a bus shelter, and in the weekly 'El Tiempo' newspaper to advertise the project and invite participation in seven community meetings held in Fall of 2016. OP also provided interpretation services for Spanish-speaking residents who participated in community meetings held in Columbia Heights.

OHR applauds OP for these efforts and encourages the agency to use this public engagement model to expand outreach efforts to other LEP/NEP language communities. While OP reports that the agency does not currently interface with LEP/NEP customers, culturally and linguistically targeted outreach can ensure that LEP/NEP communities who will be impacted by OP's projects have an opportunity to participate in planning efforts. Equipping OP's planners with multilingual outreach materials and access to interpretation services, partnerships with the Mayor's constituency offices and community-based organizations, and dissemination of translated information through various ethnic media outlets can help OP reach and solicit community input from a broader and linguistically diverse audience.

In FY18, OHR recommends that OP continue to meet outreach requirements; centralize translated documents on the agency's website; provide language access compliance training for all public facing employees; and ensure that grantees and contractors OP anticipates having in FY18 comply with their language access responsibilities.



Office of the People's Counsel

12/12

overall compliance score

12/12

FY16 Score

FY17 Top Languages Encountered:

Spanish, Amharic, Chinese, French, Vietnamese, Italian, Korean, Tigrinya, and Punjabi

5/5

Preparedness

OPC met all preparedness requirements in FY17. OPC reported comprehensive data on LEP/NEP encounters, provided agency-wide language access compliance training, and adopted a revised language access policy

4/4

Accessibility

OPC produced 50 translated documents in FY17 and participated in 69 community events. OPC followed through on FY16 recommendations and provided links to translated vital documents under language-specific tabs.

3/3

Quality

No language access complaints were filed against OPC in FY17. The agency was not tested in FY17. OPC continues to demonstrate exceptional commitment to meet language access compliance requirements.

3,844

FY17 Encounters

4,704

FY16 Encounters

OHR congratulates the Office of the People's Counsel (OPC) on another successful year during which the agency went above and beyond to meet the full range of language access compliance requirements and model effective language access implementation practices.

In FY17, OPC proactively met preparedness requirements by a) reporting comprehensive data on encounters with LEP/NEP customers; b) providing refresher language access compliance training for all OPC staff; and c) updating the agency's language access policy. OPC also conducted targeted outreach to LEP/NEP residents by participating in and/or sponsoring over 69 culturally and linguistically diverse community events throughout the year, and translated 11 vital documents (10 into Chinese, 9 into Spanish and French each, 8 into Vietnamese, and 7 into Amharic and Korean each) including fact sheets, press releases, meeting flyers, and forms, most of which are available on the agency's website.

OPC also followed through on OHR recommendations and adopted a new sign-in sheet containing instructions in six languages, and centralized all translated documents under language-specific tabs on the agency's website. Finally, OPC continued including language preference on relevant vacancy announcements in FY17 to attract Spanish, Chinese and Amharic-speaking bilingual candidates, and worked with the Mayor's constituency offices to get the agency's translated documents reviewed for quality assurance purposes.

OHR once again applauds OPC for its unwavering commitment to language access and inclusion and looks forward to supporting the agency's continued compliance efforts in FY18.



Office of the State Superintendent of Education

12/14

overall compliance score

8/14

FY16 Score

FY17 Top Languages Encountered:

Spanish, Amharic, French, Mandarin, Tigrinya, Arabic, Bengalis, Bambara, Cantonese, Vietnamese

5/5

Preparedness

OSSE reported comprehensive data on LEP/NEP encounters in FY17; trained frontline staff; adopted a language access policy; trained and collected data from some grantees and contractors; introduced a new data collection mechanism. In FY18, OSSE needs to train all public contact staff, and all grantees and contractors.

4/4

Accessibility

OSSE translated over 45 vital documents; created a "language support" feature on its website; and participated in 17 community meetings to engage LEP/NEP families.

3/5

Quality

One language access public complaint was filed against OSSE in FY17. 1 out of 8 telephone testers who called OSSE was denied language assistance. In FY17, OSSE made significant improvements in language access implementation.

4,570

FY17 Encounters

13,576

FY16 Encounters

7 out of 8

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

OHR congratulates the Office of the State Superintendent of Education (OSSE) on improved field testing results which show that seven of the eight testers who called the agency received prompt interpretation services. This is a significant improvement compared to FY16 test results indicating that the agency took intentional steps to ensure that the agency's frontline employees consistently provide language assistance.

OSSE's reports indicate that the agency has made substantial progress in FY17, and taken aggressive measures to bring the agency into compliance with the Language Access Act. In FY17, OSSE a) revised the agency's language access policy; b) added language drop-down menu to customer tracking systems to identify language assistance needs of customers; c) installed new double-handset phones in frontline locations; d) reissued an updated quick reference guide for telephonic interpretation services which was distributed to staff during training and via the agency newsletter; e) provided language access compliance training for 148 employees and grantees; f) delivered targeted training for all Transportation Division Parent Resource Center call agents who were, again, retrained through DCHR's Center for Learning and Development; and g) issued an internal memo reminding call agents of language access compliance requirements.

In addition to strengthening the agency's overall preparedness to serve LEP/NEP customers, OSSE tackled important accessibility requirements. The agency a) added Spanish prompts to the Parent Resource Center's automated telephone message; b) translated over 45 vital documents into up to six languages producing a total of 181 in-language documents including an updated Transportation Handbook for Parents and Guardians which is now available in Spanish, Amharic, Chinese, and French; and c) added a new "language support" to the agency's website which provides an entry point for LEP/NEP readers and a description of the agency's services in 6 languages.

OHR commends OSSE for these achievements in FY17 and for steady efforts to implement corrective actions and BLAP recommendations. In FY18, OHR looks forward to supporting OSSE in a) providing agency-wide training which reaches all units and departments; b) developing a comprehensive strategy for ensuring that grantees and contractors comply with language access requirements; c) adding additional multilingual prompts to the Parent Resource Center's automated messages; and d) uploading all translated documents to the agency's website under language-specific pages in the "language support" section.

10/14

overall compliance score

8/14

FY16 Score

FY17 Top Languages Encountered:

Spanish, Mandarin, Amharic,
Taishanese, Vietnamese, Korean

3/5

Preparedness

OTA met reporting requirements in FY17 and has a language access policy in place. In FY18, the agency needs to improve data collection strategies and take immediate steps to ensure all frontline staff receive language access compliance training.

4/4

Accessibility

OTA translated 6 vital documents in FY17 and participated in 8 community outreach events. In FY18, OTA needs to target outreach efforts, upload translated documents on the agency's website, and include multilingual taglines on vital documents.

3/5

Quality

No language access complaints were filed against the OTA in FY17. One out of four telephone testers was denied language assistance. The agency made some improvements in FY17 but needs to take further action in FY18 to address long standing gaps in compliance.

391

FY17 Encounters

214

FY16 Encounters

3 out of 4

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

OHR credits the Office of Tenant Advocate (OTA) for FY17 field testing results indicating that three out of the four testers who called the agency received interpretation services. While the Amharic, Vietnamese, and Korean testers all received prompt interpretation services through a telephonic interpreter, the Arabic tester reported that her first call was unintentionally dropped, and her second call was directed to voicemail without receiving interpretation services. OTA's field testing results over the last three years show that frontline staff successfully provide language assistance to callers.

In FY17, OTA translated 5 vital documents into Spanish and 1 into Amharic. Translated documents include legal agreements and authorization forms, an intake form, and the program for OTA's annual summit. OTA also reported having participated or hosted 8 community events, and noted that the agency currently has five bilingual employees who speak Spanish, Urdu, Persian, Farsi, and French.

While OTA met planning and reporting requirements in FY17, OHR requests the agency take steps to ensure that comprehensive data is being collected and reported on a quarterly basis. OHR notes that a number of LEP/NEP interactions in which OTA employees used a telephonic interpreter in FY17 were not reflected in the agency's reports.

In FY18, OHR once again urges OTA to take immediate action to address long standing gaps in compliance. The agency has yet to provide agency-wide in person training to ensure that all public-contact staff understand the full range of language access compliance requirements. OHR also reiterates that the agency must make intentional efforts to engage LEP/NEP residents to ensure that they can access the critical services OTA offers. While OTA reported that the agency participated in 8 community events, these events do not appear to specifically target or reach LEP/NEP communities.

Finally, OHR advises the agency to certify existing bilingual staff in FY18; translate vital documents into additional languages; upload newly translated documents to the "language support" section of its website; and include multilingual taglines on public-facing vital documents to ensure that the agency remains accessible to LEP/NEP residents in whose language vital documents have not yet been translated.

8/12

overall compliance score

9/12

FY16 Score

FY17 Top Languages Encountered:

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

4/5

Preparedness

OTR reported data on LEP/NEP encounters in FY17, and provided language access compliance training to 98 employees. In FY18, OTR needs to adopt a language access policy and provide agency-wide language access trainings.

2/4

Accessibility

OTR translated one vital document into Spanish in FY17, and participated in one community event. In FY17, OTR needs to translate additional vital documents and create a "language support" section on its website.

2/3

Quality

No language access public complaints were filed against OTR in FY17. The agency was not tested in FY17. OTR has made improvements but needs to address significant compliance gaps in FY18.

4,697

FY17 Encounters

5,151

FY16 Encounters

OHR notes that the Office of Tax and Revenue (OTR) has shown some improvement in language access implementation and continued efforts to address compliance gaps in FY17.

OTR's implementation reports indicate that in FY17, the agency a) provided language access compliance training for 98 employees, a majority of which were frontline staff; b) translated a pin verification notice into Spanish; c) participated in a community outreach event; d) instituted a new system allowing security guards to track LEP/NEP encounters; and e) assigned a Spanish-speaking bilingual employee to assist taxpayers with accessing their tax information on a public computer in the walk-in center.

In FY18, OTR plans to implement electronic multilingual signage to be displayed in the agency's public-facing locations to more effectively communicate information and instructions to LEP/NEP taxpayers. While OTR currently has signage in English and Spanish displayed in the walk-in-center, electronic signage will allow the agency to share more detailed information in a greater number of languages. OTR also plans to provide mandatory online language access compliance training for OTR staff in FY18 which will also be tracked through the agency's Human Resources Department.

OHR looks forward to supporting OTR's implementation of these plans. In addition to improving the agency's signage, OHR strongly recommends that OTR take immediate action to address long standing gaps in compliance as it relates to a) adopting a language access policy; b) translating tax-related vital documents; c) providing access to translated vital documents on OTR's website; and d) conducting meaningful outreach to LEP/NEP communities. As stated in OHR's feedback on the agency's FY17/18 BLAP, as well as in FY15 and FY16 scorecards, OTR must translate prioritized vital documents and create a "language support" feature on OTR's website containing a translated description of the agency's services and links to translated vital documents. OTR must also immediately develop and adopt a language access policy.



Office of Unified Communications

14/14

overall compliance score

14/14

FY16 Score

FY17 Top Languages Encountered:

Spanish, Mandarin, Amharic, Arabic, French, Korean, Vietnamese, Russian, Haitian Creole, Portuguese

5/5

Preparedness

OUC reported comprehensive data on LEP/NEP encounters in FY17, and provided language access compliance training to frontline staff.

4/4

Accessibility

OUC translated 1 vital document into Spanish in FY17, and conducted outreach at 73 community events.

5/5

Quality

No language access complaints were filed against OUC in FY17. The agency provided language assistance to all 7 field testers who called the agency in FY17. OUC continues to take proactive steps to meet language access compliance requirements.

10,364

FY17 Encounters

7,352

FY16 Encounters

7 out of 7

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

OHR congratulates the Office of Unified Communications (OUC) on FY17 field testing results indicating that, once again, the agency received a perfect score: all seven telephone testers who called OUC received prompt interpretation services. OHR also notes that the agency continues to demonstrate a firm commitment to language access implementation.

In FY17, OUC reported significantly higher encounters with LEP/NEP customers, and relied primarily on telephonic interpretation services to provide language assistance in 29 different languages. OUC's encounters climbed from 7,352 in FY16 to 10,364 in FY17. OUC also reported that in FY17, a) 60 employees received language access compliance training; b) the agency's bilingual employees and community engagement team attended 73 outreach events to promote the agency's services; and c) the Smart911 brochure was translated into Spanish.

OUC currently employs 18 bilingual call takers and dispatchers who speak Spanish (14), Amharic (2), Farsi (1), and Yoruba (1). As OUC implements plans to attract and recruit bilingual frontline employees who speak additional languages, OHR recommends that the agency certify all bilingual staff by providing language proficiency testing.

OHR commends OUC for taking proactive steps to provide access and quality customer service to LEP/NEP callers. In FY18, OHR looks forward to supporting OUC in meeting the agency's strategic goals outlined in the FY17/18 Biennial Language Access Plan.

Compliance Details

Agencies' scores are based on questions related to compliance with the Language Access Act. A checkmark indicates successful completion of the requirement. 'N/A' is where a particular question does not apply to the specific agency for FY17.



AGENCY NAME	ABRA	CFSA	DBH	DCRA	DOC	DOES	DOEE	DGS	DOH	DHCF	DHCD	DCHR	DHS	DMV	DPR	DPW	DDS	DDOT	DCHA
PREPAREDNESS																			
P1. Agency provided comprehensive data on FY17 encounters.	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
P2. Agency has a language access policy.	✓	✓	✓	✓	✓	✓	✓		✓		✓	✓	✓	✓	✓	✓	✓	✓	✓
P3. Agency staff were trained in FY17.		✓	✓	✓		✓	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓	✓
P4. Agency communicated effectively.	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓			✓	✓	✓	✓	✓
P5. Agency took steps to ensure grantee/contractor compliance.		✓	✓			✓	✓		✓	✓		✓		✓	✓				
PREPAREDNESS SCORE	3	5	5	4	3	5	5	1	5	3	4	5	3	4	4	4	4	4	4
ACCESSIBILITY																			
A6. Agency displayed adequate signage in public facing locations		✓	✓	✓	✓		✓		✓	✓		✓	✓	✓	✓		✓	✓	✓
A7. Vital documents were translated and/or updated in FY17.		✓	✓		✓	✓	✓		✓	✓		✓	✓	✓	✓	✓	✓	✓	
A8. Translated vital documents are accessible on agency website.		✓	✓		✓		✓					✓		✓	✓	✓	✓	✓	
A9. Efforts were made to reach out to LEP/NEP communities in FY17.	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓		✓	✓	✓	✓	
ACCESSIBILITY SCORE	1	4	4	2	4	2	4	0	3	3	1	4	3	3	4	3	4	4	1
QUALITY																			
Q10. No complaints were filed against the agency in FY17.	✓	✓	✓		✓		✓	✓	✓	✓	✓	✓			✓	✓	✓	✓	✓
Q11. Agency was not found in non-compliance in FY17.	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓
Q12. No tester was turned away during tests.	N/A	✓	✓		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.	N/A	✓	✓	✓	N/A		N/A	N/A		N/A		N/A	✓	✓		✓		N/A	
Q14. OHR has observed improvements in LA implementation in FY17.		✓	✓			✓	✓		✓	✓	✓	✓				✓	✓	✓	
QUALITY SCORE	2	5	5	2	2	2	3	2	3	3	3	3	2	1	2	5	3	3	2
TOTAL AGENCY SCORE	6	14	14	8	9	9	12	3	11	9	8	12	8	8	10	12	11	11	7
TOTAL POSSIBLE SCORE	12	14	14	14	12	14	12	12	14	12	14	12	14	14	14	14	14	12	14

AGENCY NAME	DYRS	DCLB	DCOZ	DCOA	DCPL	DCPS	FEMS	HSEMA	MPD	OAH	OAG	OCP	OP	OTR	OPC	OSSE	OTA	OUC
PREPAREDNESS																		
P1. Agency provided comprehensive data on FY17 encounters.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓		✓
P2. Agency has a current language access policy.	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓		✓		✓	✓	✓	✓
P3. Agency staff were trained in FY17.	✓	✓	✓				✓	✓		✓	✓			✓	✓	✓		✓
P4. Agency communicated effectively.	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
P5. Agency took steps to ensure grantee/contractor compliance.	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
PREPAREDNESS SCORE	5	5	5	2	4	3	5	5	4	5	5	1	4	4	5	5	3	5
ACCESSIBILITY																		
A6. Agency displayed adequate signage in public facing locations	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
A7. Vital documents were translated and/or updated in FY17.	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓		✓		✓	✓	✓	✓
A8. Translated vital documents are accessible on agency website.			✓		✓	✓	✓		✓	✓	✓				✓	✓	✓	✓
A9. Efforts were made to reach out to LEP/NEP communities in FY17.	✓	✓			✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
ACCESSIBILITY SCORE	3	3	3	1	4	3	4	3	4	4	4	1	3	2	4	4	4	4
QUALITY																		
Q10. No complaints were filed against the agency in FY17.	✓	✓	✓	✓	✓	✓		✓		✓	✓	✓	✓	✓	✓		✓	✓
Q11. Agency was not found in non-compliance in FY17.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Q12. No tester was turned away during tests.	N/A	N/A	N/A	N/A	N/A		N/A	N/A	✓	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.	N/A	N/A	N/A	N/A	N/A		N/A	N/A	✓	N/A	N/A	N/A	N/A	N/A	N/A	✓	✓	✓
Q14. OHR has observed improvement in LA implementation in FY17.	✓	✓	✓		✓		✓	✓	✓	✓	✓		✓		✓	✓		✓
QUALITY SCORE	3	3	3	2	3	2	2	3	4	3	3	2	3	2	3	3	3	5
TOTAL AGENCY SCORE	11	11	11	5	11	8	11	11	12	12	12	4	10	8	12	12	10	14
TOTAL POSSIBLE SCORE	12	12	12	12	12	14	12	12	14	12	12	12	12	12	12	14	14	14

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