



# FY18

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

**Office of Human Rights**  
DISTRICT OF COLUMBIA

\*\*\* WE ARE WASHINGTON \*\*\*  
GOVERNMENT OF THE  
DISTRICT OF COLUMBIA  
DC MURIEL BOWSER, MAYOR

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# note from OHR director

Dear Partners and Allies,

The DC Office of Human Rights (OHR) is thrilled to commemorate the 15th anniversary of the passage of the D.C. Language Access Act in 2019. This report provides important updates and accomplishments for fiscal year 2018, but the work of transforming access for LEP/NEP residents began long ago. Limited and non-English proficient (LEP/NEP) workers, business owners and residents now represent 33% of the foreign-born population and 6.1% of all residents ages 5 and older in the District. With over 100,000 foreign-born residents calling the District their home today, our local agencies continue to reshape the way they communicate with their customers by offering interpretation services, translating vital documents, weaving multilingual content into their website, and displaying inclusive signage and service delivery environments.

Highlights in this report include the work of the Language Access Program, such as **6475 employees and grantees trained** on language access compliance; tracking over **180,000 encounters with LEP/NEP** customers who required language access and spoke 69 different languages; and more. Throughout the District government, over **75,000 calls were logged using telephonic** interpretation services and more than **1,200 documents were translated** in to the top 12 major languages represented in the District, including Spanish, Amharic, French and Chinese.

Additionally, detailed accomplishments and goals for **38 covered entities with major public contact** and **23 covered entities** are also included in the form of compliance scorecards in this publication. The scorecards produced for the 38 agencies designated as entities with major public provide a snapshot of each agency's level of compliance, an overview of how accessible an agency is to LEP/NEP residents and customers, and any corrective actions recommended by OHR to address gaps in compliance.



“A safer stronger DC requires us to work harder, now more than ever to eliminate language barriers so that access is available to all residents regardless of their English language proficiency.”

We want to share our sincere thanks with our partners in this work: the DC Language Access Coalition and the Mayor's Offices of African, Asian & Pacific Islander, and Latino Affairs. Their hard work and investment in the success of the Act's implementation everyday has made it possible to take the promise of the Act and turn it into a reality.

As we prepare to celebrate the 15th anniversary of the Language Access Act in April 2019, we look ahead to the next chapter of the District's journey toward greater access and inclusion. OHR is excited to continue working with committed agency leaders, Language Access Coordinators, Points of Contact and community partners to fully actualize the vision and mandate of the Language Access Act of 2004. We are evermore committed and ready to facilitate the transformation and innovation needed to expand access to services and justice for the District's growing LEP/NEP populations.

A handwritten signature in black ink, appearing to read 'Monica Palacio'.

Monica Palacio  
Director, DC Office of Human Rights

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



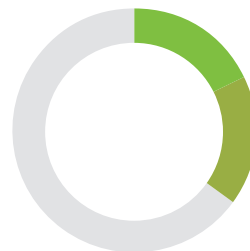
**FOREIGN-BORN POPULATION**  
**2017** | 14.7% (101,860)  
**2016** | 13.3% (90,631)



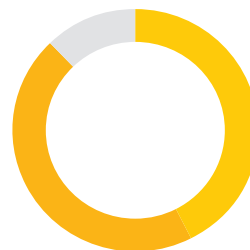
**BORN IN AFRICA**  
**2017** | 15.1% (15,380)  
**2016** | 15.4% (13,937)



**BORN IN ASIA**  
**2017** | 21.7% (22,067)  
**2016** | 19.3% (17,508)



**BORN IN EUROPE**  
**2017** | 17.9% (18,622)  
**2016** | 17.1% (15,479)



**BORN IN LATIN AMERICA**  
**2017** | 42.7% (43,573)  
**2016** | 45.1% (40,868)



**NORTH AMERICA (OUTSIDE U.S.) AND OCEANIA**  
**2017** | 2.5% (2,571)  
**2016** | 3.1% (2,816)

Source: Migration Policy Institute tabulations of 2017 and 2016 one-year estimate data from the U.S. Census Bureau's American Community Survey (ACS).

**6.1%** of District residents age 5 or older are limited English proficient

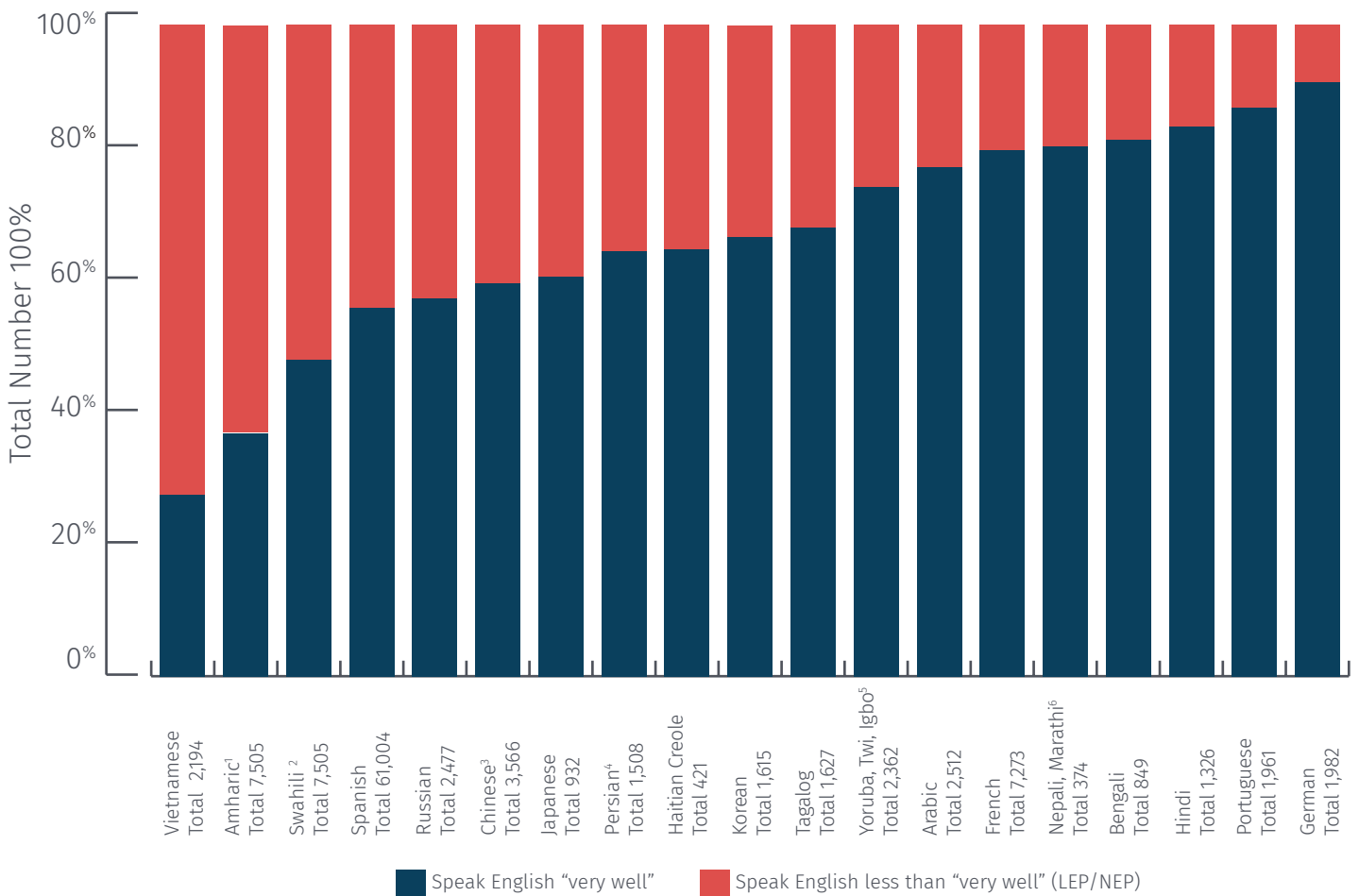


**33.8%**

of the District's **99,896** foreign-born residents age 5 or older (33,765) are limited English proficient

- ▶ **42.3%** of the District's foreign-born residents (age 5 or older) who are noncitizens are limited English proficient
- ▶ **20.4%** of the District's naturalized foreign-born residents age 5 or older are limited English proficient
- ▶ **1.3%** of the District's US-born population age 5 or older is limited English proficient
- ▶ **17.6%** of District residents age 5 or older speak a language other than English at home

## Language Spoken at Home by English Proficiency (population age 5 or older)



<sup>1</sup> Includes Other Afro-Asiatic languages

<sup>2</sup> Includes other Central, Eastern, and Southern African languages

<sup>3</sup> Includes Mandarin and Cantonese

<sup>4</sup> Includes Farsi and Dari

<sup>5</sup> Includes Other Languages of Western Africa

<sup>6</sup> Includes Other Indic Languages

# 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. It is the task of the Language Access Program to annually monitor and evaluate all covered entities. OHR's FY18 Annual Compliance Review provides individual scorecards for 38<sup>1</sup> covered entities with major public contact assessing their level of compliance with the Language Access Act and a compliance profile for 23 covered entities.

<sup>1</sup>This report features only 38 compliance scorecards. In efforts to avoid bias, though OHR is covered entity it does not score itself.

Covered Entities with Major Public Contact	Covered Entities
<p>Designate a <b>Language Access Coordinator</b>;</p> <p>Collect data on the agency’s interactions with LEP/NEP customers;</p> <p>Provide interpretation services;</p> <p>Provide written translation of vital documents;</p> <p>Train staff on language access compliance;</p> <p>Develop a <b>Biennial Language Access Plan</b>, and report implementation progress to OHR on a quarterly basis; and</p> <p><b>Conduct outreach</b> to LEP/NEP</p>	<p>Designate a <b>Language Access Point of Contact</b>;</p> <p>Collect data on the agency’s interactions with LEP/NEP customers;</p> <p>Provide interpretation services;</p> <p>Provide written translation of vital documents;</p> <p>Train staff on language access compliance; and</p> <p>Submit a yearly implementation report to OHR.</p>
Covered Entities with Major Public Contact	Covered Entities (with designated Language Access Point of Contact)
<p>Alcoholic Beverage Regulation Administration</p> <p>Child and Family Services Agency</p> <p>Department of Aging and Community Living</p> <p>Department of Behavioral Health</p> <p>Department of Consumer and Regulatory Affairs</p> <p>Department of Corrections</p> <p>Department of Employment Services</p> <p>Department of Energy &amp; Environment</p> <p>Department of General Services</p> <p>Department of Health Care Finance</p> <p>Department of Housing and Community Development</p> <p>Department of Human Resources</p> <p>Department of Human Services</p> <p>Department of Motor Vehicles</p> <p>Department of Parks and Recreation</p> <p>Department of Public Works</p> <p>Department of Small and Local Business Development</p> <p>Department of Youth Rehabilitation Services</p> <p>Department on Disability Services</p> <p>District Department of Transportation</p> <p>District of Columbia Health</p> <p>District of Columbia Housing Authority</p> <p>District of Columbia Lottery and Charitable Games Control Board</p> <p>District of Columbia Office of Zoning</p> <p>District of Columbia Public Library</p> <p>District of Columbia Public Schools</p> <p>Fire and Emergency Medical Services Department</p> <p>Homeland Security and Emergency Management Agency</p> <p>Metropolitan Police Department</p> <p>Office of Administrative Hearings</p> <p>Office of the Attorney General – Child Support Services Division</p> <p>Office of Contracting and Procurement</p> <p>Office of Human Rights</p> <p>Office of Planning</p> <p>Office of Tax and Revenue</p> <p>Office of the People’s Counsel</p> <p>Office of the State Superintendent of Education</p> <p>Office of the Tenant Advocate</p> <p>Office of Unified Communications</p>	<p>Commission on the Arts and Humanities</p> <p>Department of Forensic Sciences</p> <p>Department of For-Hire Vehicles</p> <p>Department of Insurance, Securities and Banking</p> <p>District of Columbia Board of Elections</p> <p>District of Columbia Corrections Information Council</p> <p>District of Columbia Developmental Disabilities Council</p> <p>District of Columbia Housing Finance Agency</p> <p>District of Columbia Retirement Board</p> <p>District of Columbia Water and Sewer Authority</p> <p>Health Benefit Exchange Authority</p> <p>Office of Cable Television, Film, Music and Entertainment</p> <p>Office of Disability Rights</p> <p>Office of Employee Appeals</p> <p>Office of the Attorney General</p> <p>Office of the Chief Medical Examiner</p> <p>Office of the Chief Technology Officer</p> <p>Office of the Inspector General</p> <p>Office of Police Complaints</p> <p>Office of Victim Services and Justice Grants</p> <p>Public Services Commission</p> <p>Real Property Tax Appeals Commission</p> <p>State Board of Education</p>

# 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 that 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 Contact.

## **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 to assess covered entities' compliance with the Act's requirements.

## **COMMUNITY ENGAGEMENT**

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

## our mission

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.



# FY18 LA Program Highlights

In FY18, the Language Access Program provided extensive training, individual consultation, and technical assistance to Language Access Coordinators (LACs) and Language Access Points of Contact (LAPOCs) to support agencies' implementation of language access requirements and improve overall compliance with the Language Access Act. The program also conducted outreach and education to ensure that the District's linguistically diverse limited English proficient populations are aware of their right to language access.

## TRAINING & TECHNICAL ASSISTANCE

**33** | one-on-one meetings

were held with covered entities with major public contact to develop agencies' FY19/20 Biennial Language Access Plans.

**30** | language access compliance trainings

were delivered directly to **860 District employees**, grantees, and contractors.

**5** | language access and cultural competency trainings

were delivered through DCHR's Center for Learning and Development.

**5** | bimonthly technical assistance sessions

were hosted for LACs covering best practices for enhancing data collection and reporting, developing biennial language access plans, and ensuring grantee and contractor compliance.

**2** | language access compliance orientation sessions

were held for LAPOCs to provide guidance on language access implementation activities and annual reporting requirements.

**4** | meetings were held

with the Mayor's Offices on Latino, Asian and Pacific Islander, and African Affairs to coordinate technical assistance efforts.

## | DIGITAL LANGUAGE ACCESS SIGNAGE |

In an effort to improve language access signage across District agencies, OHR's LA Program worked with the Office of Cable Television, Film, Music & Entertainment and the Mayor's Offices on African, Asian & Pacific Islander, and Latino Affairs to produce an educational video promoting the District's interpretation services to LEP/NEP customers. These agencies worked collaboratively with OHR to develop a culturally appropriate message, translate the content of the video into the 10 languages most widely spoken in the District, and launch production in FY18. Once it is completed, this video will be displayed on screens in various public facing locations throughout District agencies to provide a visual reminder for LEP/NEP customers to exercise their right to language access and encourage wider use of interpretation services.

## COMMUNITY ENGAGEMENT

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.

1106

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

48

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

2800

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

20

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

# Language Access Enforcement

The Office of Human Rights investigates language access public complaints filed by individuals who are denied their right to language assistance or allege that a covered entity has violated the Language Access Act. Once OHR conducts a pre-investigation resolution intervention to ensure that complainants receive immediate services, public complaints are docketed and investigated before the OHR Director issues written findings. Agencies found in violation of the Language Access Act are required to implement corrective actions mandated by OHR.

**In FY18, OHR received a total of 18 language access inquiries alleging violation of the Language Access Act:**

- ▶ 4 were docketed and are under investigation following a pre-investigation resolution process, and
- ▶ 14 were administratively dismissed based on lack of jurisdiction or failure to state a claim.

**OHR issued a total of 7 determinations in FY18:**

- ▶ 3 were against the Metropolitan Police Department, and the agency was found in non-compliance with the Language Access Act in 2 of the 3 cases for failure to provide interpretation services;
- ▶ 2 were against the Department of Motor Vehicles, and the agency was found in non-compliance with the Language Access Act in both cases for failure to provide interpretation services;
- ▶ 1 was against the Fire and Emergency Management Services and found the agency in non-compliance with the Language Access Act for failure to provide interpretation services; and
- ▶ 1 was against the Department of Human Services and found the agency in compliance with the Language Access Act.

**COMPLAINT OUTCOMES FY14-FY18<sup>1</sup>**

	FY18	FY17	FY16	FY15	FY14
Inquiries	18	38	18	23	17
Resolved in pre-investigation with agency acknowledging violation	0	2	4		
Under investigation	4	12	6	13	9
Administrative Dismissals	14	24	8	10	8
Lack of jurisdiction	9	12	3	5	4
OHR unable to contact Complainant	0	2	1	1	2
Failure to state a claim	5	2	2	1	2
Withdrawn by complainant	0	8	2	3	

## FY18 COMPLAINTS UNDER INVESTIGATION BY AGENCY

Covered Entity	Number of Complaints
Metropolitan Police Department	3
Mayor's Office on Community Relations and Services	1

## INQUIRIES RECEIVED FY13 -FY18<sup>1</sup>

Covered Entity	FY18	FY17	FY16	FY15	FY14	F13
Non-Covered Entities	9	14	2	6	5	1
Department of Motor Vehicles		10	4	6	3	1
Department of Human Services	1	7	2	2	3	6
Metropolitan Police Department	4	2	4	1	3	
Department of Consumer Regulatory Affairs		1		3		
District of Columbia Public Schools			1	1		1
Department of Employment Services		1	1	1		
Fire and Emergency Management Services		2		1		
District of Columbia Housing Authority			1		1	
Department of Disability Services				1		1
Office of State Superintendent of Education		1		1		
Office of Zoning and Office of Planning			1			
Department of Health (DC Health)			1			
Department of Youth Rehabilitation Services			1			
DC Taxicab Commission (Dept. of For-Hire Vehicles)					1	
District of Columbia Board of Elections					1	
Department of Behavioral Health						1
OAG Child Support Services Division						1
Department of Transportation	1					
Mayor's Office on Community Relations and Services	1					
Department of Public Works	1					
Child and Family Services Agency	1					
<b>Total</b>	<b>18</b>	<b>38</b>	<b>18</b>	<b>23</b>	<b>17</b>	<b>11</b>

<sup>1</sup> Blank boxes in table indicates the zero inquires where received against the agency listed in both the "Complaint Outcomes FY14-18" and Inquires Recieved FY 13-18" charts.

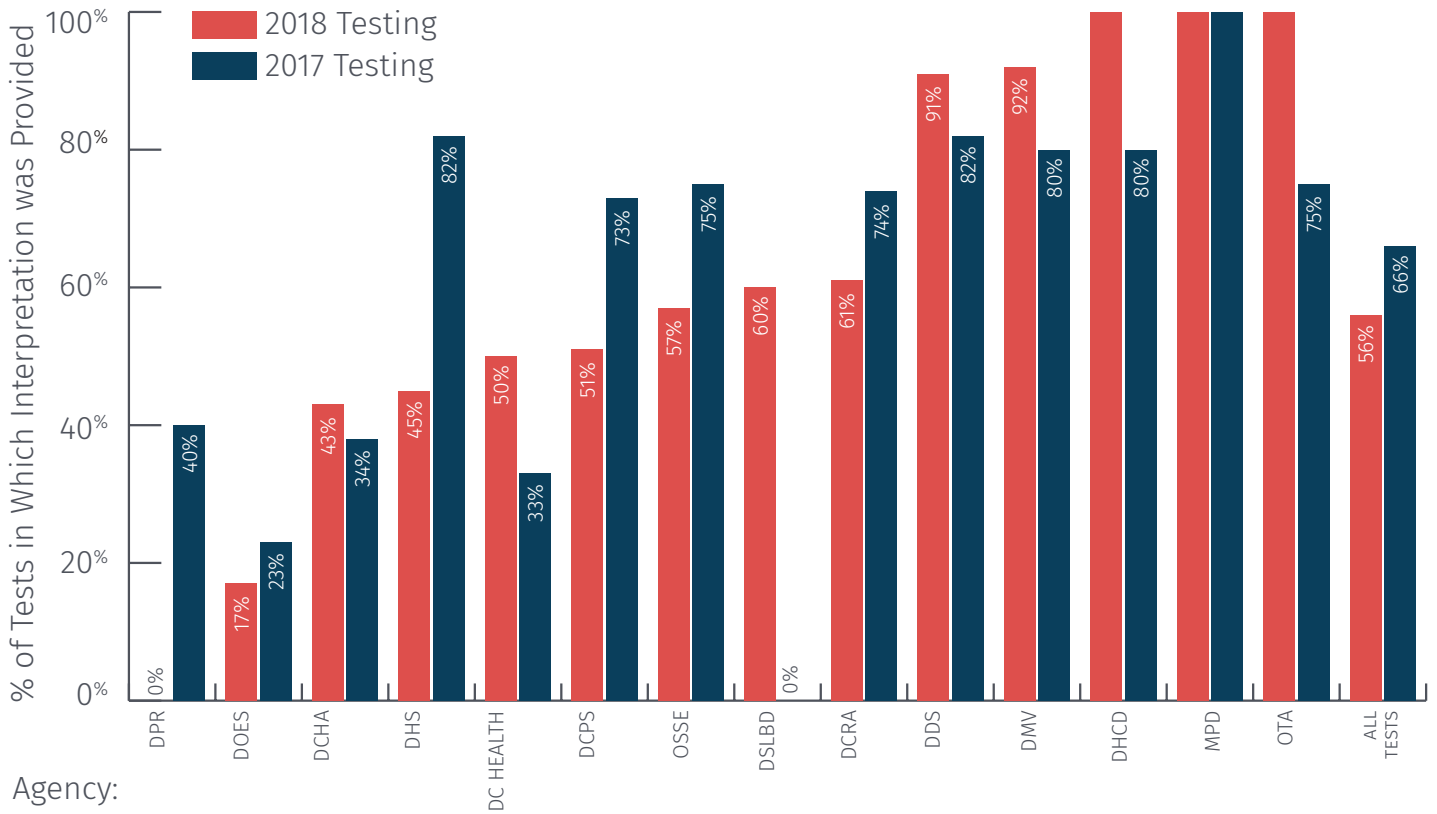
# Language Access Testing

Through its partnership with the Equal Rights Center (ERC), OHR conducted 130 telephone and 106 in-person tests in FY18 to assess the accessibility of 17 covered entities with major public contact. ERC testers either visited or called these agencies and attempted to obtain information from frontline employees while speaking exclusively in one of seven non-English languages: Amharic, Arabic, Chinese, French, Korean, Spanish, and Vietnamese. The ERC 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 FY18 and FY17 tests to offer a comparative picture on observed trends and overall performance.

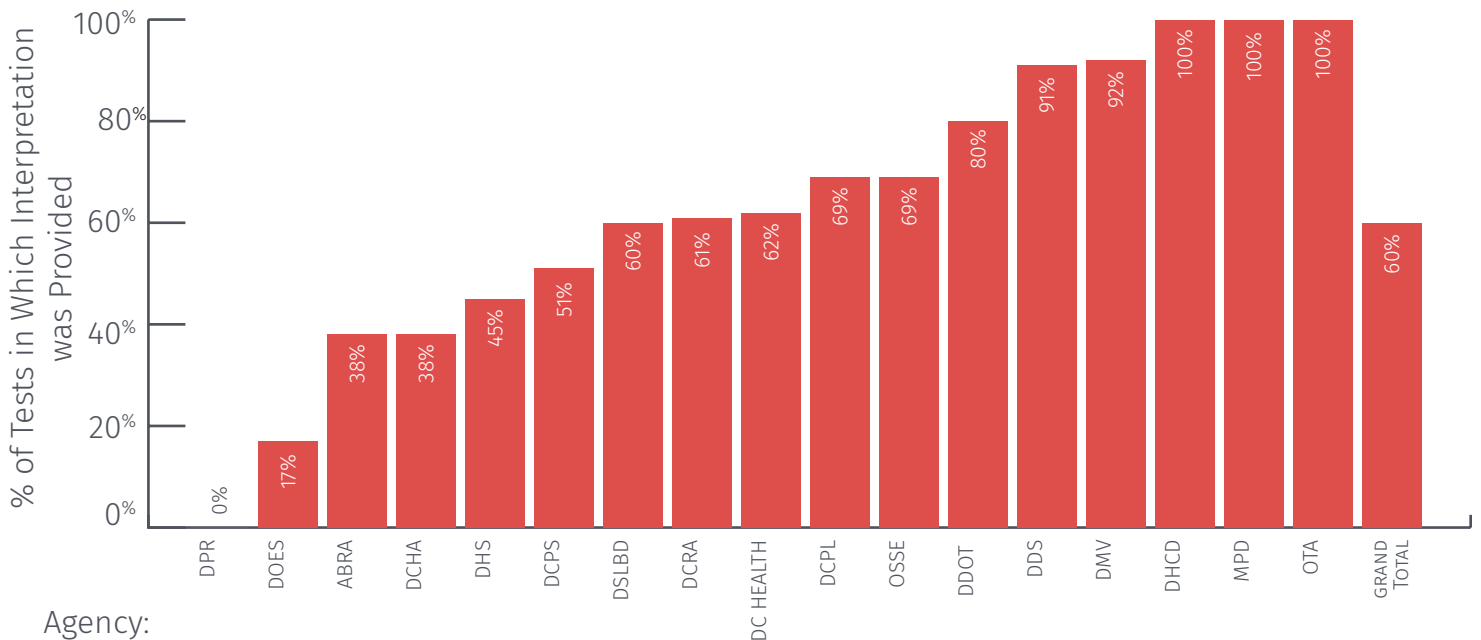
## SUMMARY OF FINDINGS:

- ▶ **50%** of agencies tested in both years improved their interpretation rates from FY17 to FY18.
- ▶ At sites tested in both years, **overall interpretation rates were 10% lower** in FY18 than they were in FY17.
- ▶ Tested agencies performed slightly better on in-person tests. However, interpretation rates for phone tests were significantly lower in FY18, producing the overall net decline in interpretation rates.
- ▶ Testers received language assistance in **88%** of in person tests, as compared to **86%** in FY17, **92%** in FY16, and **88%** in FY15.
- ▶ Testers received language assistance in **37%** of the telephone tests as compared to **57%** in FY17, **43%** in FY16 and **45%** in FY15.
- ▶ Testers received interpretation services through a telephonic interpreter in **50%** of the tests, through a bilingual employee in **9%** of the tests, and through an in-person interpreter in **1%** of the tests.
- ▶ **33%** or **43 of the 130** phone tests reached an automated voice menu. **10 of the 43** calls reached instructions in the tester's language, and **2 out of the 10** calls were connected to a live employee.
- ▶ Testers reported seeing language access signage more frequently at test sites in FY18 than in FY17.
- ▶ **52%** of tested locations displayed language access signage that was visible to all testers, **24%** were visible to some testers, and **24%** were visible to none of the testers.
- ▶ Testers received translated vital documents in their language in **13%** of in-person tests conducted in FY18.

## Comparative Interpretation Rates by Agency



## 2018 Interpretation Rate by Agency Only



# Telephone vs. In Person Tests<sup>1</sup>

## STAFF ATTEMPTED TO PROVIDE INTERPRETATION



## INTERPRETATION WAS PROVIDED

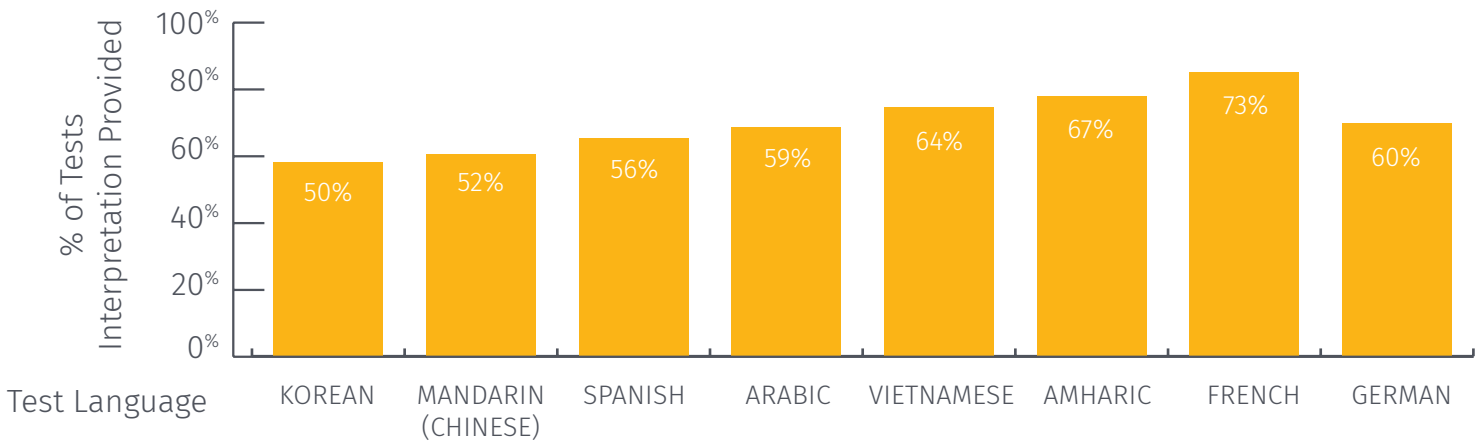


## WAIT TIME FOR INTERPRETATION WAS APPROPRAITE

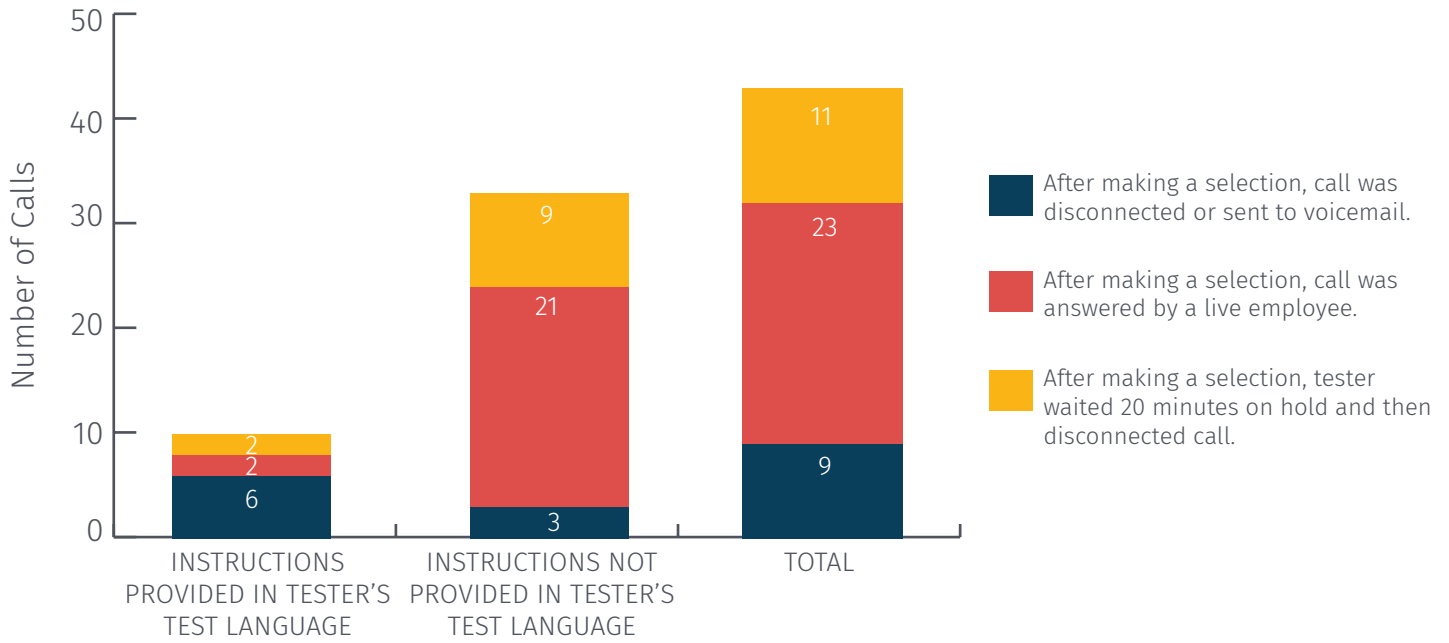


<sup>1</sup> Criteria used to measure appropriate wait times in FY 18 was 10 minutes or less for in-person interpretation was and 7 minutes or less for phone interpretation.

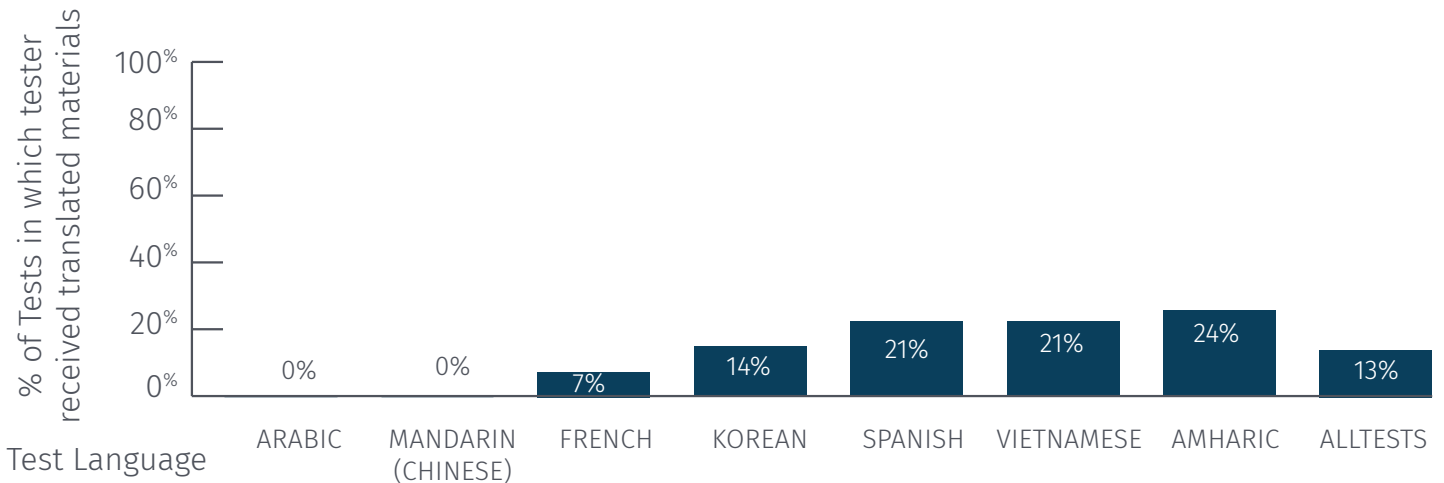
## Interpretation Rate by Language



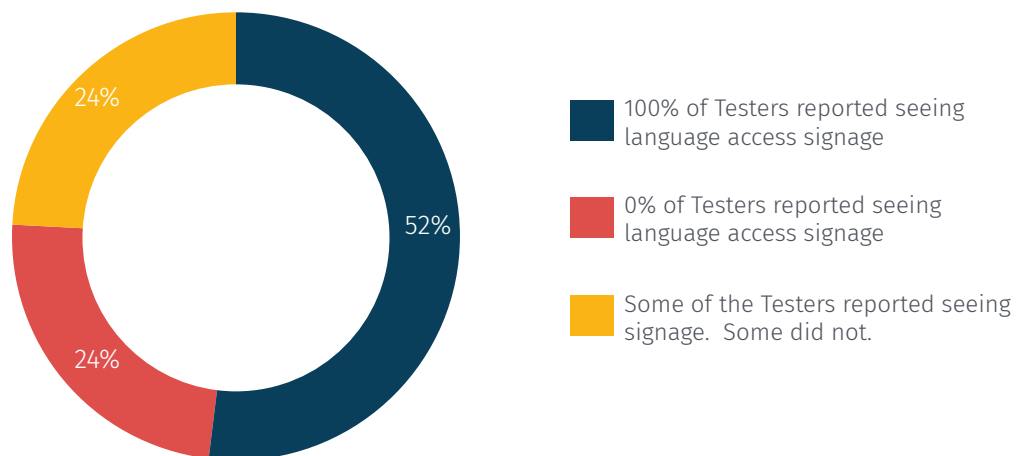
## Calls Answered by Automated Menu



## Translated Documents Made Available by Language



## Language Access Signage<sup>1</sup>



<sup>1</sup> Language signage can include but is not limited to a Language Line Services desk card, "I Speak" cards and other public facing materials and resources available to help customers identify their language need.



## Stakeholder Accomplishments

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 assist OHR and District agencies 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 achieved the following outcomes in FY18 as part of their work to strengthen the District’s compliance with the Language Access Act:

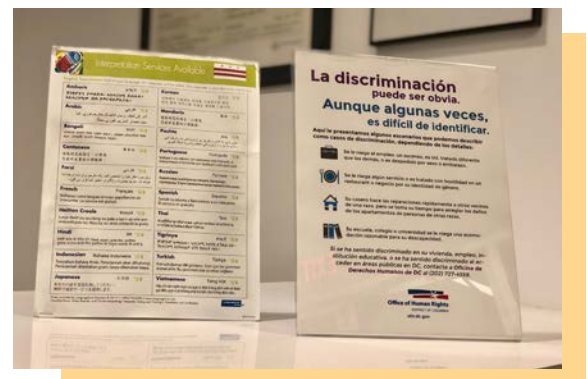
### MAYOR’S OFFICE ON AFRICAN AFFAIRS

#### FY19/20 Biennial Language Access Plan (BLAPs) Review

MOAA reviewed Biennial Language Access Plan (BLAPs) developed by DC government agencies and provided recommendations on how agencies can better serve the District’s African LEP/NEP customers and comply with the Language Access Act.

#### Language Access Signage

MOAA worked on developing culturally relevant messaging and branding for the creation of multilingual language access signage intended to make public-facing physical centers more accessible and welcoming for LEP/NEP customers.



#### Quality Assurance

MOAA provided technical assistance to District government agencies throughout FY18 by reviewing documents translated into African languages and by providing guidance as agencies worked to centralize translated vital documents on their website. MOAA provided quality assurance reviews and technical assistance to the Department of Employment Services (DOES), the Department of Parks and Recreation (DPR), Fire and Emergency Medical Services Department (FEMS), the Office of Human Right (OHR), the Department of Human Services (DHS), and the District of Columbia Public Library (DCPL).

## Language Access Coordinators' Mixer

MOAA hosted a mixer and convened Language Access Coordinators in FY18 to share best practices, facilitate inter-agency collaboration, and exchange information on outreach and community engagement opportunities. Language Access Coordinators from the Child and Family Services Agency (CFSA), Metropolitan Police Department (MPD), Department of Behavioral Health (DBH), Department of Parks and Recreation (DPR), Homeland Security and Emergency Management Agency (HSEMA), Department of Corrections (DOC), District Department of Transportation (DDOT), Department of Public Works (DPW), and Department of Consumer and Regulatory Affairs (DCRA) attended the mixer.

## Outreach to LEP/NEP Residents

In partnership with grantees, as well as community-based and faith based organizations, MOAA conducted outreach to engage linguistically diverse LEP/NEP residents in the African community to better connect them to government services and inform them of their language access rights.

## Bilingual Hiring

In an effort to encourage DC government agencies to hire qualified multilingual or bilingual staff in public-facing positions, MOAA hosted a job fair connecting agencies to qualified multilingual candidates. Job seekers who participated in the fair participated in four consecutive job readiness workshops held before the fair which were designed to address barriers to employment skilled immigrants face related to language, culture, and credential-recognition.

## **MAYOR'S OFFICE ON ASIAN AND PACIFIC ISLANDER AFFAIRS**

### MPD Cultural Competency Training Video

Recognizing that language access and cultural competency ensure that DC government services are accessible and welcoming to all regardless of English proficiency, MOAPIA launched a cultural competency training video for the Metropolitan Police Department (MPD). The video contains in-depth information about Asian American and Pacific Islander (AAPI) communities in DC, and includes MOAPIA's recommendations for improved community policing within the District's AAPI community. Approximately 3,500 police officers and 500 civilian MPD staff have watched the video. MOAPIA will build on the training video to expand cultural sensitivity training with MPD in FY2019.

### DCPS Cultural Competency Training Module

MOAPIA worked with DC Public School (DCPS) Language Acquisition Division to develop a cultural competency training webinar tailored to educators and offered a module to be included in DCPS' online language access training module. The module covers cultural and linguistic barriers AAPI students and their families face, as well as MOAPIA's recommendations for adopting a culturally nuanced approach to serving AAPI students.



### DC Health Language Access Compliance Testing

In 2018, MOAPIA worked with DC Health to address findings from language access compliance tests conducted in Korean, Chinese, and Vietnamese at six DC regulated hospitals and four clinics that were frequently visited by the District’s AAPIs.

### DMV Cultural Competency Training

MOAPIA worked with the Office of Human Rights (OHR) to provide a joint Language Access and Cultural Competency training to the Department of Motor Vehicle (DMV).

### Bilingual Outreach Specialists at DHS

MOAPIA detailed bilingual outreach specialists to the Department of Human Services’s (DHS) H Street and Taylor Street Service Centers. Outreach specialists provide language assistance to Chinese and Vietnamese constituents who wish to access Medicare, Medicaid, DC Alliance, SNAP, Child Care Assistance, and housing benefits.

### Bilingual Outreach

MOAPIA has conducted door-to-door bilingual outreach to AAPI business owners and residents. In FY18, MOAPIA reached out to more than 460 Asian small businesses in the District and shared information in Korean, Chinese, and Vietnamese about government programs including 911 and 311 services.

### Technical Assistance

MOAPIA provided technical assistance and recommendations for DC agencies on their translation and outreach plans to ensure that they are culturally appropriate and effective in reaching AAPI communities.

## MAYOR'S OFFICE ON LATINO AFFAIRS

### Language Access Monitoring

MOLA monitored, assisted, and provided feedback to 38 District government agencies to ensure that they implement language access requirements and adopt best practices. MOLA reviewed agencies' individual Biennial Language Access Plans (BLAPs) and provided recommendations on how agencies can better serve LEP/NEP constituents in the Latino community.

### Bilingual Hiring

MOLA produced and disseminated bi-weekly bilingual job announcements to 10,000+ subscribers in the Latino community. Announcements included job openings in District government and aimed to increase the linguistic capacity of District agencies by better connecting them with qualified bilingual candidates. MOLA also worked with OHR, MOAA, MOAPIA and DC Human Resources to plan a city-wide bilingual hiring fair through which agencies can hire bilingual staff into public-facing positions.

### Language Access Lunch and Learn

Over the course of FY18, MOLA hosted 6 "Lunch & Learn" meetings for Language Access Coordinators and District government employees to share best practices on language access implementation and address challenges they face in serving LEP/NEP customers.

### Language Access Signage

MOLA worked in partnership with OHR, MOAPIA, MOAA and the Office of Cable Television, Film Music and Entertainment to develop a video providing instructions for LEP/NEP customers to request interpretation services when visiting District government agencies. MOLA provided messages in Spanish to be included in the video and assisted during the production process.

### Cultural Competency Training for MPD

MOLA produced a cultural competency training video for the Metropolitan Police Department (MPD) to increase the cultural awareness of MPD officers in serving the District's Latino population. MOLA also delivered a cultural awareness and language access training as part of a panel discussion hosted for MPD staff.

### Capacity Building

MOLA provided interpretation equipment and support to grantees, DC government agencies, and other community-based organizations to facilitate provision of interpretation services for LEP/NEP individuals.

## DC LANGUAGE ACCESS COALITION

The D.C. Language Access Coalition (Coalition) is an alliance of diverse community based organizations and individuals advocating for language access rights within the District of Columbia. Currently hosted by Many Languages One Voice, the Coalition provides monitoring, evaluation, technical assistance, and community education on language access in the District, and initiates campaigns to ensure District government agencies are accountable to the Language Access Act.

As a result of the Coalition's work over the past five years to strengthen the Language Access Act, the Language Access for Education Amendment Act was unanimously passed by DC Council in December 2018. In addition to introducing a fine structure of \$2,500 to be imposed on agencies found in violation of the Act, the amendment brings forth the following changes:

- ▶ Adds three additional pieces of essential information that the District of Columbia Public Schools (DCPS) and public charter schools will be required to translate and provide to parents or guardians who are limited or non-English proficient;
- ▶ Clarifies that the Office of the State Superintendent of Education (OSSE) will assess the threshold for document translation at each school by determining the number of limited or non-English proficient served by the school;
- ▶ Requires the Council of the District of Columbia to translate hearing notices and content on its website.

In FY19, the Coalition will continue advocating for the District's underrepresented limited and non-English proficient individuals to ensure they have equal access and can participate fully in DC's public programs and benefits. The Coalition continues to strengthen its membership base and widen the scope of its outreach efforts to better engage partners and LEP/NEP communities in ongoing advocacy efforts.

# Compliance Profile of Covered Entities

The DC Language Access Act requires all covered entities to provide interpretation and translation services, adopt a comprehensive language access policy, train public contact staff, and meet signage and website accessibility requirements. Covered entities not designated as agencies with major public contact are required, by regulation, to a) appoint a Language Access Point of Contact (LAPOC) tasked with coordinating the agency’s compliance efforts; b) attend a language access orientation every year; and c) submit an annual report detailing language access implementation efforts and encounters with LEP/NEP customers. The table below provides an assessment of 23 covered entities and their level of compliance with these requirements in FY18.

Baseline Compliance Areas					FY18 Compliance Summary and FY19 Priorities
LA POC Designation	Orientation Attendance	Annual Reporting	Telephonic Interpretation Account	Website Accessibility	
<b>DC Board of Elections (DCBOE)</b>					
✓	✓		✓		<p>FY18 LEP/NEP Encounters: 68</p> <p>Top Languages Encountered: Spanish and Amharic</p> <p>DCBOE took proactive steps in FY18 to adopt a comprehensive language access policy and provide language assistance to voters. The agency assigned Spanish, Amharic, Mandarin, and Vietnamese in-person interpreters to key polling sites on Election Day, and translated ballots and directional signs into Spanish, Amharic and Chinese. DCBOE also provided election materials in a language kit at each polling site to ensure polling site workers were equipped to serve LEP/NEP voters in their language. In FY19, OHR urges DCBOE to fulfill language access compliance training and reporting requirements, and ensure that the agency’s website contains vital information in top languages spoken by LEP/NEP voters.</p>
<b>DC Commission on Arts and Humanities (DCCA)</b>					
✓	✓		✓		<p>While DCCA reported training frontline staff on language access compliance requirements and translating two vital documents in FY17, the agency did not provide an implementation report in FY18. OHR urges DCCA to take immediate steps to comply with language access requirements in FY19 by translating vital documents, creating a language support page on its website, and by training both staff and grantees to ensure they are equipped to serve LEP/NEP individuals.</p>

**DC Corrections Information Council (CIC)**

✓	✓				<p>CIC fulfilled reporting requirements in FY17, but failed to provide an update on language access implementation activities or encounters with LEP/NEP individuals in FY18. OHR urges CIC to take immediate steps in FY19 to set up a telephonic interpretation service account, provide language access training to public contact staff, adopt a language access policy, and add a language support section to the agency’s website.</p>
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**DC Health Benefit Exchange Authority (HBX)**

✓	✓	✓	✓	✓	<p>FY18 LEP/NEP Encounters: 5158</p> <p>Top Languages Encountered: Spanish, Amharic, Mandarin, French, Vietnamese, Portuguese, Cantonese, Korean, Arabic</p> <p>HBX fulfilled the full range of language access compliance requirements in FY18. The agency’s FY18 implementation report indicates that the agency a) provided language access compliance training to case managers and providers, b) hired a bilingual employee to join the agency’s five certified bilingual staff in public contact positions, c) partnered with bilingual brokers, certified assisters, and navigators to provide in-person enrollment assistance to customers in various languages; and d) provided a language-specific listing of certified DC Health Link Brokers, Assisters or Navigators LEP/NEP individuals can select to use on its website. HBX also uses multilingual taglines in up to 23 languages on notices the agency generates; translated 10 high priority forms such as applications and appeal rights documents into Spanish, Amharic, Chinese, and French; and provided a summary of pertinent information on health insurance options in six languages on its website.</p> <p>In FY19, OHR recommends that HBX develop and adopt a comprehensive language access policy, and ensure that its network of grantees and providers, and report encounters with LEP/NEP individuals and certify compliance with language access requirements in writing.</p>
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**Department of Forensic Sciences (DFS)**

✓	✓				<p>DFS failed to meet annual reporting requirements in FY18 and does not yet have an account with the District’s telephonic interpretation services. Even with the agency’s limited interface with the public or with LEP/NEP individuals, OHR encourages the agency to ensure that it is adequately equipped to provide language access and that its public facing employees are trained on language access compliance requirements.</p> <p>In FY19, OHR urges DFS to train all public contact staff, set up a telephonic interpretation service account, translate vital documents, and provide a summary of the agency’s services on its website in the District’s top languages.</p>
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Department of For-Hire Vehicles (DFHV)					
✓	✓		✓		<p>FY18 LEP/NEP Encounters: 20</p> <p>Top Languages Encountered: Spanish, Mandarin</p> <p>In FY19, OHR urges DFHV to provide comprehensive language access compliance training for all public contact employees and create a language access policy. Additionally, the agency needs to translate vital documents and improve the accessibility of its website by creating language support pages with links to translated vital documents.</p>
Office of Cable Television, Film, Music, and Entertainment (OCTFME)					
✓	✓	✓	✓		<p>FY18 LEP/NEP Encounters: 22</p> <p>Top Languages Encountered: Spanish, Mandarin, Arabic</p> <p>In FY18, OCTFME launched its first series in Spanish, Cambios De Vida (Life Changes), to better engage the District's Spanish-speaking community. OHR applauds this effort as well as the steps the agency has taken to train public contact staff and provide interpretation services.</p> <p>In FY19, OCTFME needs to adopt a language access policy, translate vital documents, and create a language support section on its website to provide a summary of its programs in the District's top languages.</p>
Office of Employee Appeals (OEA)					
✓	✓	✓	✓		<p>FY18 LEP/NEP Encounters: 6</p> <p>Top Language Encountered: Spanish</p> <p>OHR credits OEA for taking steps in FY18 to fulfill language access compliance requirements despite the agency's minimal interactions with LEP/NEP individuals, and for setting up an account with the District's provider for telephonic interpretation services.</p> <p>In FY19, OEA needs to provide language access compliance training for all public contact staff, translate vital documents, and create a language support section on the agency's website to provide a summary of its services in the District's top languages.</p>



Office of Disability Rights (ODR)					
✓	✓	✓	✓	<p>FY18 Encounters: 3</p> <p>Top Language Encountered: Spanish</p> <p>ODR met reporting requirements in FY18 and provided language access compliance training for public contact staff. ODR also translated the agency's brochure into Spanish, Amharic, Chinese, French, Korean and Vietnamese.</p> <p>OHR encourages the agency to continue efforts to provide meaningful access to LEP/NEP individuals and implement plans to translate disability sensitivity training materials and provide multilingual information on its website. In FY19, ODR needs to adopt a language access policy.</p>	
Office of Police Complaints (OPC)					
✓	✓		✓	✓	<p>FY18 LEP/NEP Encounters: 12</p> <p>Top Languages Encountered: Mandarin, Amharic, Spanish, Vietnamese</p> <p>OPC failed to provide an update on language access implementation activities carried out in FY18. The agency's FY18 annual report indicates that OPC worked with community-based organizations such as Briya Public Charter School and the Latin American Youth Center to engage LEP/NEP residents and assess police-community relations in immigrant communities. OHR applauds OPC for these efforts and encourages the agency to conduct similar activities with the District's Asian and Pacific Islander and African communities. OHR credits OPC for including a description of its services on its website in Spanish.</p> <p>In FY19, OHR urges the agency to fulfill reporting requirements, provide language access compliance training for public contact staff, and translate vital documents into languages the agency encounters. While OPC provides a description of its programs and services in Spanish on its website, the agency can improve accessibility by adding similar pages in additional languages.</p>

**Office of the Attorney General for the District of Columbia (OAG)**

✓	✓		✓	✓	<p>FY18 LEP/NEP Encounters: 517</p> <p>Top Languages Encountered: Spanish, Amharic, French, Vietnamese, Mandarin, Cantonese, Russian, Tigrigna, Haitian Creole, Bengali</p> <p>Although OAG made steady efforts to comply with the Language Access Act and took proactive steps in FY17 to meet training, translation, and website accessibility requirements, the agency failed to fulfill reporting requirements in FY18. In addition to dedicating a link for vital information on worker rights in Spanish, OAG’s website offers automatically generated translation of all content on the website in six languages. OHR urges OAG to immediately transition away from using automated translation as the process does not have a quality assurance mechanism. Instead, OAG can offer a language support page that provides translated summaries of the agency’s services and programs into six languages.</p> <p>In FY19, OHR also encourages OAG to fulfill reporting requirements, provide language access compliance training for all public contact staff, and adopt a comprehensive language access policy.</p>
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**Office of the Chief Financial Officer (OCFO)**

✓	✓		✓	✓	<p>FY18 LEP/NEP Encounters: 3295</p> <p>Top Languages Encountered: Spanish, Amharic, Korean, Mandarin, French, Arabic, Vietnamese, Swahili, Cantonese, Tigrigna</p> <p>OCFO failed to provide an update on language access implementation activities conducted in FY18. While the agency’s website provides links to forms and vital documents translated into various languages, the links appear inactive.</p> <p>OHR urges OCFO to ensure that the agency satisfies reporting requirements in FY19. Additionally, the agency needs to provide language access compliance training for all public contact staff, adopt a language access policy, translate vital documents, and create a language support section on its website to provide a description of its services and programs in a minimum of six languages.</p>
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**Office of Victim Services and Justice Grants (OVSJG)**

✓	✓		✓	✓	<p>OVSJG proactively offers training and resources to ensure that its public facing grantees fulfill language access compliance requirements and offer language assistance to the victims they serve. However, in FY18, OVSJG failed to fulfill reporting requirements.</p> <p>In FY19, OVSJG needs to provide an update on steps taken to satisfy language access compliance requirements, train public contact staff and grantees, collect data on LEP/NEP encounters from its grantees, adopt a language access policy, and provide a language support section on its website containing a summary of its programs and services in the top languages spoken by the District’s LEP/NEP residents.</p>
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**Public Services Commission (PSC)**

✓	✓		✓	✓	<p>FY18 LEP/NEP Encounters: 43</p> <p>Top Languages Encountered: Spanish, Cantonese, Vietnamese, Haitian Creole, Amharic</p> <p>PSC made significant efforts in FY17 to satisfy language access compliance requirements but failed to fulfill FY18 reporting requirements. PSC currently provides a description of the agency’s services and programs in Spanish. OHR encourages PCS to enhance the accessibility of its website by creating a language support section that provides a summary of its programs and links to translated vital documents in additional languages including Amharic, Chinese, French, Vietnamese and Korean.</p> <p>In FY19, PCS needs to ensure that reporting requirements are adhered to, and take proactive steps to adopt a language access policy, train public contact employees on language access compliance requirements, and translate prioritized vital documents into top languages spoken by LEP/NEP residents.</p>
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**Real Property Tax Appeals Commission (RPTAC)**

✓	✓				<p>RPTAC did not meet FY18 reporting requirements or provide updates on language access implementation activities. While the agency may have limited encounters with LEP/NEP individuals, OHR urges RPTAC to take basic measures to ensure that public contact staff are equipped to provide language assistance when needed. As such, RPTAC needs to set up an account with the District’s provider for telephonic interpretation services, train public contact staff on language access compliance requirements and resources, and provide a language support page on its website containing a summary of the agency’s services in the top six languages spoken by the District’s LEP/NEP residents.</p>
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**State Board of Education (SBOE)**

✓	✓	✓	✓	<p>FY18 LEP/NEP Encounters: 48</p> <p>Top Language Encountered: Spanish</p> <p>SBOE, along with the Office of the Ombudsman and the Office of the Student Advocate have made significant efforts over the years to ensure that families can access to vital information in their language, and translated vital documents including the Office of the Student Advocate’s brochures into Spanish, Amharic, French, Vietnamese, Chinese and Korean. SBOE also provides interpretation services during public meetings and intake interviews conducted with families.</p> <p>In FY19, SBOE needs to provide comprehensive language access compliance training for all employees in public contact positions, adopt a language access policy, and create language support pages on its website containing key vital documents and a description of its services in top languages spoken by the District’s LEP/NEP families.</p>
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The following covered entities successfully designated a Language Access Point of Contact but have failed to failed to comply with the other four baseline compliance areas requirements in FY 18: Office of the Chief Medical Examiner | Office of the Chief Technology Officer | Developmental Disabilities Council | Department of Insurance, Securities and Banking | Office of the Inspector General | DC Retirement Board | DC Housing Finance Agency.

## 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 evaluates the extent to which 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 76.

The agency's overall compliance score is based on three performance categories: preparedness, accessibility, and quality.

## RATING METHODOLOGY:

	Requirements	Evaluation questions
<b>PREPAREDNESS (P)</b>	P1. Agency provided comprehensive data on FY18 encounters.	<p>Did the agency record its encounters with LEP/NEP constituents and report them to OHR?</p> <p>Is the agency using more than one method to collect data?</p> <p>Did the agency implement OHR recommendations or FY17/18 BLAP action items related to data collection?</p>
	P2. Agency has a current language access policy.	<p>Did the agency develop or revise its language access policy over the last three years?</p> <p>Has agency submitted a policy for OHR's approval within the last three years?</p>
	P3. Agency staff were trained in FY18.	<p>Did the agency train staff on language access requirements and resources?</p> <p>Did the agency implement OHR recommendations and/or FY17/18 BLAP action items related to staff training?</p>
	P4. Agency communicated effectively.	<p>Did the agency send a representative to bimonthly LA Coordinators meetings hosted by OHR?</p> <p>Was the agency responsive to OHR inquiries?</p> <p>Did the agency proactively reach out to OHR?</p>
	P5 Agency took steps to meet grantee and contractor compliance requirements.	<p>Did the agency take reasonable steps to ensure that its grantees and contractors complied with the Language Access Act?</p> <p>Did the agency train grantees/contractors and their employees on language access compliance requirements?</p> <p>Did the agency modify contracts or MOUs, or obtain signed agreements from grantees/contractors to certify compliance?</p>

<b>ACCESSIBILITY (A)</b>	<p>A6. Agency displayed adequate language access signage in public facing locations.</p>	<p>Do agency's public facing locations display multilingual signs informing LEP/NEP customers about their right to language assistance?</p> <p>Does the agency visibly display language identification posters, "I Speak" cards, multilingual banners, or other tools allowing LEP/NEP customers to identify their language?</p>
	<p>A7. Vital documents were translated and/or updated in FY18.</p>	<p>Did the agency translate any vital documents in FY18?</p> <p>Has the agency translated documents into all languages that the agency regularly encounters?</p> <p>Did the agency implement OHR recommendations or FY17/18 BLAP action items related to document translation?</p>
	<p>A8. Translated vital documents are accessible on agency website.</p>	<p>Does the agency have any web pages in languages other than English?</p> <p>Are the agency's public facing vital documents available on the website in other languages?</p> <p>Did the agency implement OHR recommendations or FY17/18 BLAP action items related to online accessibility of translated documents?</p>
	<p>A9. Efforts were made to reach out to LEP/NEP communities in FY18.</p>	<p>Did the agency conduct outreach specifically targeting LEP/NEP communities?</p> <p>Did outreach initiatives bring the agency into meaningful contact with LEP/NEP constituents?</p> <p>Did agency implement OHR recommendations or FY17/18 BLAP action items related to outreach to LEP/NEP communities?</p>

<b>QUALITY (Q)</b>	Q10. No complaints were filed against the agency in FY18.	Were any complaints filed against the agency?
	Q11. Agency was not found in non-compliance in FY18.	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.	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 services received requested information or services.	ONLY FOR AGENCIES THAT UNDERWENT FIELD TESTING When testers did receive language assistance, were they able to obtain the information or resources that they requested? Were they able to communicate effectively through the services offered?
	Q14. OHR has observed improvement in LA implementation in FY18.	Has the agency taken steps to provide or sustain full access to LEP/NEP customers? Has the agency addressed some, if not all, systemic issues to close gaps in compliance and improve agency's service to LEP/NEP customers? Do FY18 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 and 23 covered entities assessed in FY18.

### PREPAREDNESS

180,405

encounters with LEP/NEP customers were reported in FY18 across all District government agencies.

6475

District government employees, including contractor and grantee staff, received language access compliance or refresher training in FY18

33 out of 38

covered entities with major public contact fulfilled reporting requirements and submitted comprehensive data on encounters with LEP/NEP customers.

29 out of 38

covered entities with major public contact adopted revised language access policies in FY18.

### ACCESSIBILITY

75,844

calls were made by frontline employees in FY18 to reach a telephonic interpreter and communicate with customers speaking **69** different languages.

694

translated vital documents were made available by covered entities with major public contact. Vital documents were translated into Spanish (349), Amharic (99), French (67), Chinese (67), Vietnamese (63), Korean (46), Tigrigna (3), Tagalog (1), Polish (1), and Pitjantjatjara (1)

33 out of 38

covered entities with major public contact displayed visible language access signage in public facing locations.

25 out of 38

agencies reported conducting outreach activities specifically designed to engage LEP/NEP communities.

25 out of 38

agencies updated their websites by providing links to translated vital documents.

Based on language line<sup>1</sup> usage, the top 10 languages served were:

Spanish	Amharic	French	Mandarin	Vietnamese	Arabic	Tigringa	Bengali	Cantonese	Haitian Creole
61128	7580	1691	1369	986	477	315	297	231	234

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

Spanish	Amharic	French	Mandarin	Chinese	Vietnamese	Cantonese	Tigrigna	Korean	Arabic
153392	14450	3720	2637	1264	1396	644	577	561	509

**QUALITY**

50%

of tested agencies scored higher in FY18 than they did in FY17. However, overall interpretation rates were **10% lower** in 2018 than they were in 2017.

88%

of the in-person field tests showed agencies provided adequate interpretation services.

37%

of the telephone field tests showed agencies provided adequate interpretation services.

18

language access public complaints were filed with OHR in FY18, showing a **52% decrease** from the 38 complaints received in FY17

of 18

complaints received in FY17, 4 **were docketed**, and **14 were dismissed** based on lack of jurisdiction or failure to state a claim.

<sup>1</sup> Telephonic Interpretation services provided by Language Line Solutions.

# Compliance Scorecards: 33 Major Public Contact Agencies

Data underlying the agency scores can be found beginning on page 74.



# | Alcoholic Beverage Regulation Administration |

**6/14**  
overall  
compliance  
score



## Telephone Tests

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



## In-Person Tests

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

## preparedness

**3/5**

ABRA failed to meet preparedness requirements in FY18 and needs to take steps to provide language access compliance training to public contact employees.

## accessibility

**0/4**

ABRA did not translate vital documents or upload translated documents on its website in FY18. The agency did not make efforts to engage LEP/NEP communities.

## quality

**3/5**

5 out of 8 testers did not receive interpretation services in FY18. While no complaints were filed against ABRA in FY18 and the agency met reporting requirements, the agency made insufficient efforts to address ongoing compliance gaps.

**FY17 Score: 6/12 FY18 Encounters: 37**

## FY18 Top Languages Encountered:

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

Language access field tests conducted at the Alcoholic Beverage Regulation Administration (ABRA) for the first time in FY18 indicated that interpretation services were provided in 3 out of 8 tests. Interpretation services were provided in none of the phone tests. All four telephone testers reported that their calls were answered by live employees who intentionally disconnected them. While the Spanish-speaking in-person tester received interpretation services through a bilingual employee, the Amharic tester was taken to the Department of African Affairs, where a bilingual employee provided interpretation. Agency employees refused to provide interpretation services to the Korean tester. Only two testers reported seeing language access signage and none of the testers received written materials in their test language.

Although ABRA fulfilled planning and reporting requirements in FY18, the agency failed to take any steps during the course of the fiscal year to address longstanding gaps in language access compliance or train public contact employees on language access compliance requirements. As repeatedly indicated, and as FY18 test results illustrate, ABRA's field inspectors and frontline employees who interface daily with the District's linguistically diverse business community remain ill-equipped to serve LEP/NEP individuals. In addition to failing to meet basic preparedness requirements, ABRA has also failed to translate vital documents, conduct meaningful outreach to LEP/NEP stakeholders, or make its website linguistically accessible.

# | Child and Family Services Agency |



## preparedness

5/5

CFSA fulfilled planning and reporting requirements in FY18, and trained frontline employees, managers, and grantees on language access compliance requirements.

## accessibility

4/4

CFSA translated a vital document into Spanish in FY18, and participated in community outreach events. In FY19, CFSA should conduct direct and targeted outreach to LEP/NEP stakeholders, and improve accessibility of the “language support” section of its website.

## quality

3/3

No complaints were filed against CFSA in FY18. The agency was not tested in FY18. CFSA continues to make steady efforts to meet Language Access Act requirements.



FY17 Score  
14/14



FY18 Encounters  
1,787

## FY18 Top Languages Encountered:

Spanish, Amharic, Mandarin, French, Russian, Tigrigna, Portuguese, Vietnamese, Farsi, Thai

The Child and Family Services Agency (CFSA) continues to make steady efforts to satisfy the requirements of the Language Access Act. Because the agency received perfect scores in both FY17 and FY16 language access field tests, the agency was not tested in FY18.

CFSA’s FY18 language access implementation report indicates that the agency a) delivered six language access compliance training sessions throughout the year, including an OHR-led training for 88 managers and one for grantees and contractors; b) attended foster care community recruitment events throughout the city, c) translated a case-specific vital document into Spanish, and d) placed multilingual information on its website. CFSA also states that ongoing mandatory trainings allow public contact employees to serve LEP/NEP customers with a better understanding of their needs whether they’re encountered during visits to the agency, family team meetings, or home visits.

In FY19, OHR encourages CFSA to take proactive steps to expand community engagement efforts and enhance the agency’s website accessibility. As outlined in its FY19/20 Biennial Language Access Plan, CFSA needs to a) develop multilingual outreach and communication strategies by convening the agency’s outreach team and representatives from the Mayor’s Offices on African, Asian & Pacific Islander, and Latino Affairs and the DC Language Access Coalition; b) use new language-specific media outlets and social media platforms to disseminate vital information; and c) translate key vital documents including the “Foster Parent Resource Guide”, “Grandparent Caregivers Program Information Guide” as well as program forms into the agency’s top six languages.



FY17 Score  
14/14



FY18 Encounters  
5,174

## preparedness

5/5

DBH met planning and reporting requirements in FY18, and trained employees and grantees on language access compliance requirements.

## accessibility

4/4

In FY18, DBH translated vital documents into 10 different languages and participated in 58 community outreach events. In FY19, DBH needs to specifically target outreach to diverse LEP/NEP populations.

## quality

3/3

No language access public complaints were filed against DBH in FY18. DBH was not tested in FY18. The agency maintains a steady commitment to meeting language access compliance requirements.

## FY18 Top Languages Encountered:

Spanish, Amharic, French, Vietnamese, Polish, Chinese, Tigrinya, Mandarin, Greek, Thai

The Department of Behavioral Health (DBH) continues to make exceptional efforts to meet language access compliance requirements and offer culturally and linguistically appropriate services to LEP/NEP District residents. Because DBH consistently received perfect scores on language access field tests for two years in a row, the agency was not tested in FY18.

In FY18, DBH a) met planning and reporting requirements; b) delivered 28 language access compliance training sessions for staff, grantees, and new hires; c) translated vital documents into a wide range of languages including Spanish (6), Amharic (5), French (4), Tigrigna (3), Vietnamese (3), Chinese (3), Korean (2), Tagalog (1), Pitjantjatjara (1), and Polish (1); and d) participated in 66 community outreach events throughout the year targeting both youth and adults. Additionally, DBH worked to improve overall accessibility posting multilingual instructions on its website for requesting interpretation services and by taking steps to improve compliance with language access signage requirements across public-facing areas.

In FY19, OHR recommends that DBH work to implement targeted strategies to reach LEP/NEP communities, and ensure that that agency establishes meaningful connections with language-specific media outlets and community-based networks. As outlined in DBH's FY19/20 Biennial Language Access Plan, DBH success with language access implementation can be further strengthened by working collaboratively with the agency's communications and programmatic teams, the Mayor's Offices on African, Asian & Pacific Islander, and Latino Affairs, and the DC Language Access Coalition to reach the District's linguistically diverse LEP/NEP population.

Finally, in FY19, OHR looks forward to supporting DBH in enhancing the accessibility of its website to LEP/NEP customers by centralizing all translated documents under the language support section of the website.

# | Department of Consumer and Regulatory Affairs |



## preparedness

3/5

DCRA met requirements and trained new employees on language access. In FY19, DCRA should provide agency-wide training and ensure grantees and contractors comply with language access requirements.

## accessibility

3/4

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.

## quality

2/5

No language access public complaints were filed against DCRA. While DCRA has made improvements in certain areas, major gaps in preparedness and accessibility have still not been addressed.



## DEPARTMENT OF CONSUMER & REGULATORY AFFAIRS



### In-Person Tests

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



### Telephone Tests

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

## FY18 Top Languages Encountered:

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

The Department of Consumer and Regulatory Affairs (DCRA)'s FY18 language access implementation report indicates that the agency a) trained 44 new hires on language access compliance requirements during onboarding orientation, b) participated in 12 community outreach events targeting the Asian & Pacific Islander and Latino communities, and c) placed multilingual information on the agency's website for increased accessibility to LEP/NEP customers. DCRA also reported that in FY18, the agency certified the language proficiency of bilingual staff, placed large banners in public-facing locations to inform LEP/NEP customers of their right to language assistance, and initiated a new round of revisions to its language access policy.

FY18 language access field test results show that overall interpretation rates for DCRA tests fell from 14 out of 19 (74%) in 2017 to 11 out of 18 (61%) in 2018. Language access signage was also reported less frequently in 2018 than in 2017 at DCRA facilities (63% of tests in 2017 vs. 43% of tests in 2018). The Business Licensing Center and Occupational Licensing Centers performed the best, providing interpretation in 100% of tests, while the Small Business Resource Center performed the worst, providing interpretation in only one out of six tests.

Despite repeated recommendations from OHR, DCRA has once again failed to meet key requirements that are central to language access compliance. These include providing comprehensive training for all frontline employees (and not just new hires), translating the full range of vital documents used daily across programs and services, and training and monitoring grantees to ensure they fulfill their legal obligation to provide language access to LEP/NEP customers.

OHR highly recommends DCRA to commit the resources needed to fully satisfy training, translation, and grantee compliance requirements of the Language Access Act in FY19, and encourages the agency to establish a strong language access program with dedicated staff to ensure that all of DCRA's programs, services, and grantees consistently comply with language access requirements.



FY17 Score  
9/12



FY18 Encounters  
377

## preparedness

2/5

DOC met requirements in FY18. However, DOC did not provide language access training to staff or to its providers in FY18. The agency needs provide training and update its language access policy in FY19.

## accessibility

4/4

DOC translated 3 vital documents into Spanish, uploaded documents on its website, and implemented a bilingual social media campaign.

## quality

2/3

DOC was not tested in FY18, and no complaints were filed against the agency. The agency needs to take immediate action to comply with key preparedness requirements.

## FY18 Top Languages Encountered:

Spanish, Russian, Italian, Mandarin, Arabic, Vietnamese, Farsi, Polish, Amharic

The Department of Corrections' (DOC) FY18 language access implementation report indicates that the agency translated three vital documents including its "Inmate Grievance Procedures," an "Orientation Checklist" form, and a "Holiday Visit" flyer into Spanish. DOC also reported that the agency undertook a bilingual social media campaign to promote the agency's visitation schedule for Thanksgiving and Christmas holidays. Flyers in Spanish were posted online and in locations visible to the public at the Central Detention Facility (CDF), the Correctional Treatment Facility (CTF), and the Video Visitation Center (VVC).

DOC's FY19/20 Biennial Language Access Plan outlines detailed steps the agency needs to take comply with language access requirements and better meet the needs of LEP/NEP inmates and families. These include a) training senior staff as well as case managers, corrections officers, contractors, and all public contact staff on language access compliance requirements; b) improving overall data collection to ensure data is being collected during all encounters with LEP/NEP individuals across all DOC facilities; c) re-introducing use of bilingual video recording on language access rights and developing new strategies for communicating with LEP/NEP inmates, families, and visitors.

OHR urges DOC to take immediate action in FY19 to fulfill these requirements. The agency needs to also adopt a language access policy, and certify the language proficiency of bilingual employees serving in public contact positions.



# | Department of Employment Services |



FY18 Encounters  
7,824



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

## preparedness

5/5

DOES met reporting and planning requirements in FY18 and trained frontline staff, managers and grantees.

## accessibility

4/4

DOES translated 215 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 its website.

quality  
3/5

No language access public complaint was filed against DOES in FY18. DOES made exceptional efforts to meet language access requirements but field tests show persistent barriers for LEP/NEP customers.

## FY18 Top Languages Encountered:

Spanish, Amharic, French, Chinese, Arabic, Korean, Vietnamese, Bengali, Haitian Creole, Hindi

The scope of language access implementation activities reported by the Department of Employment Services (DOES) in FY18 demonstrates a high level of commitment to meeting language access compliance requirements and to improving services for LEP/NEP customers. OHR applauds DOES for its efforts in FY18 to create new tools for improving language access implementation including developing the "LA FAQ" which an agency-specific tool used in training to addresses common language access-related questions and issues faced by frontline staff.

In FY18, DOES delivered 40 language access compliance training sessions reaching over 585 individuals. While roughly half of these trainings were offered to DOES division and American Job Center staff, the rest were delivered for grantees and contractors. DOES also reported translating 215 vital documents in FY18 including flyers, notices, program-specific letters, and fact sheets into Spanish (169), Amharic (11), Chinese (10), Korean (10), Vietnamese (9), and French (6). Additionally, the agency participated in various community events to reach LEP/NEP residents and businesses by partnering with community-based grantees and the Mayor's Office on Latino Affairs.

Although DOES provided extensive language access compliance training for both staff and grantees throughout the year, FY18 language access field test results indicated that DOES remained one of the two lowest performing agencies in terms of interpretation rate, providing interpretation on only 2 out of 12 (17%) tests. At DOES' American Job Center Headquarters, American Job Center Northeast, and the Office of Wage and Hour, none of the testers received interpretation. Testers at multiple locations also reported that employees intentionally disconnected their calls.

DOES' testing results continue to raise serious concerns about the agency's accessibility and overall treatment of LEP/NEP customers. OHR urges DOES to take immediate action in FY19 to address this trend by auditing the agency's telephone response system, retraining staff and managers in tested sites, and revising the agency's language access policy to include disciplinary measures for employees who fail to comply with the law.



## preparedness

5/5

DOEE met planning and reporting requirements in FY18, trained staff and grantees on language access compliance requirements, and revised its language access policy.

## accessibility

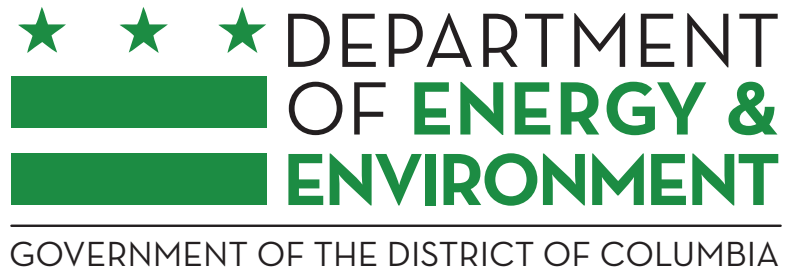
4/5

In FY18, DOEE conducted targeted outreach, translated vital documents into multiple languages, and hosted bilingual workshops. DOEE needs to improve accessibility of translated vital documents on its website.

## quality

3/3

No field tests were conducted at DDOE in FY18, and no complaints were filed against the agency. The agency continues to make exceptional efforts to meet all language access compliance requirements.



FY17 Score  
12/12



FY18 Encounters  
564

### FY18 Top Languages Encountered:

Spanish, Amharic, Mandarin, Korean, Hindi, Cantonese, Bengali, Vietnamese

In FY18, the Department of Energy and Environment (DOEE) met planning and reporting requirements, and continued making proactive efforts to sustain the agency's high performance in language access implementation.

DOEE's FY18 implementation report indicates that the agency a) delivered eight language access compliance training sessions for 120 employees; b) participated in eight community and school events specifically targeting LEP/NEP populations in the Asian & Pacific Islander and Latino communities; c) translated 24 vital documents including outreach flyers, forms, and brochures into Spanish (8), Amharic (4), Korean (4), French (3), Chinese (3), and Vietnamese (2). In FY18, DOEE also trained its grantees and contractors on language access compliance requirements and ensured that they reported encounters with LEP/NEP customers on a quarterly basis, and updated its language access policy.

In addition to using Spanish and Amharic tweets to reach LEP/NEP stakeholders, the agency's Lead and Healthy Housing team conducted bilingual workshops in FY18 targeting Amharic-speaking and Spanish-speaking residents, and the DOEE's Energy Administration promoted energy assistance programs to LEP/NEP residents through language-specific media outlets.

OHR applauds DOEE's proactive efforts to meaningfully engage LEP/NEP residents and business owners and ensure they are equally informed about the agency's programs and services.

In FY19, OHR looks forward to supporting DOEE's language access goals outlined in its FY19/20 Biennial Language Access Plan which are to expand outreach efforts, uploading translated vital documents to the agency's website, and certify the language proficiency of bilingual employees.



## preparedness

5/5

DC Health met planning and reporting requirements in FY18, provided language access training for employees and worked to ensure grantees fulfill compliance requirements.

## accessibility

3/4

DC Health translated 37 vital documents, conducted outreach to LEP/NEP communities, and met signage requirements. In FY19, DC Health should improve web accessibility of translated documents and expand its outreach to the Asian & Pacific Islander and African communities.

## quality

4/5

FY18 test results indicate that 7 out of 10 telephone testers and 1 out of 11 in-person testers did not receive interpretation services. No public complaints were filed against DC Health in FY18.

# DC | HEALTH



### In-Person Tests

10 out of 11 in-person tests provided the requested service, information, or appropriate resources.



### Telephone Tests

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

**FY17 Score:** 11/14 **FY18 Encounters:** 24,887

### FY18 Top Languages Encountered:

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

In FY18, the District of Columbia Health (DC Health) continued building on FY17 language access implementation achievements and worked to further strengthen the agency's language access program.

DC Health's FY18 implementation report indicated that the agency a) provided five language access and cultural competency training sessions for employees; b) translated 37 vital documents including forms, program flyers, presentations, and fact sheets into Spanish (22), Amharic (12), French (10), Chinese (9), and Vietnamese (5); and attended 13 community-based events and health fairs to reach LEP/NEP residents. DC Health also reported engaging grantees and contractors to promote wider use of telephonic interpretation services, institutionalizing a language access compliance training for new hires during their first month of employment, and creating culturally and linguistically targeted materials to share vital information with LEP/NEP residents.

FY18 language access field tests conducted at DC Health indicated that employees provided interpretation in 13 out of 21 tests (62%). Similar to several other agencies, interpretation rates were much higher in in-person tests than in telephone tests, as 10 out of 11 in-person testers received interpretation services but only 3 out of 10 phone testers received interpretation. DC Wellness Center/HIV/AIDS, Hepatitis, STD and TB Administration was the only test site that provided any interpretation in FY18 phone tests. However, language access signage was reported more frequently in FY18 than in FY17.

OHR recommends that DCH assess the agency's accessibility to LEP/NEP customers, improve its telephone response mechanism, and continue training efforts to ensure all employees are equipped to provide language assistance. OHR supports DCH in meeting its FY19/20 Biennial Language Access Plan goals of hiring and certifying bilingual employees who can further enhance the agency's linguistic competency and of fulfilling website accessibility requirements.



FY18 Encounters  
237



In-Person Tests  
10 out of 11 in-person tests provided the requested service, information, or appropriate resources.

## preparedness

4/5

DHCD satisfied planning and reporting requirements in FY18, and trained grantees on language access compliance requirements. In FY18 the agency needs to train public contact staff.

## accessibility

2/4

DHCD participated in 5 community events and fulfilled signage requirements in FY18. DHCD needs to take immediate steps to satisfy translation and website accessibility requirements in FY19.

## quality

5/5

All in-person testers who visited DHCD and its grantees in FY18 received language assistance. No complaints were filed against the agency in FY18. DHCD has taken steps to address the agency's longstanding gaps in language access compliance.

FY17 Score: 8/14

## FY18 Top Languages Encountered:

Spanish, Amharic, French, Vietnamese

FY18 language access field test results indicate that the Department of Housing and Community Development (DHCD) was one of 3 agencies that provided interpretation on 100% of tests in FY18. DHCD's interpretation rates improved from 80% in FY17 to 100% in FY18, and the grantees tested in FY18 performed better than those tested in FY17. Testers also reported seeing language access signage in 100% of tests at DHCD locations. However, only 1 out of 11 testers received documents in their test language.

OHR credits DHCD for this achievement and for making steady efforts to address longstanding compliance gaps. DHCD's FY18 implementation report indicates that, during the development of its FY19/20 Biennial Language Access Plan, the agency assessed agency-wide needs and capacity relating to language access. Upon identifying that its grantees interface most with LEP/NEP stakeholders, DHCD provided a language access compliance training for grantees that provide small business technical assistance and housing counseling services.

DHCD also identified the need for increased LEP/NEP community outreach and has laid out specific steps in its FY19/20 Biennial Language Access Plan for developing a comprehensive agency-wide strategy for engaging and communicating with LEP/NEP stakeholders.

OHR looks forward to supporting DHCD in implementing these plans in FY19. Other areas of compliance the agency needs to equally prioritize include a) improving the agency's data collection mechanism to better capture grantees' LEP/NEP encounters; b) training all public contact employees; and c) translating all of the agency's vital documents.

Once again, OHR reminds DHCD that the agency has not fulfilled translation or website accessibility requirements since FY 13.



## preparedness

5/5

DCHR met the full range of preparedness requirements in FY18. While DCHR did not report training activities in FY18, all employees received language access compliance training in FY17.

## accessibility

4/5

In FY18, DCHR conducted targeted outreach and provided multilingual workshops to LEP/NEP job seekers, translated 3 vital documents into Spanish, and met website accessibility requirements.

quality  
3/3

DCHR was not tested in FY18 and no complaints were filed against the agency. DCHR continues to meet all compliance requirements.



FY17 Score  
12/12



FY18 Encounters  
66

## FY18 Top Languages Encountered:

Spanish, Amharic, Vietnamese, French

Despite its minimal contact with LEP/NEP customers and the administrative nature of its work, the Department of Human Resources (DCHR) continues to take proactive steps to serve LEP/NEP customers and provide multilingual tools and resources for LEP/NEP job seekers.

In FY18, DCHR: a) met all planning and reporting requirements; b) translated three vital documents including forms and notifications of agency's policies into Spanish; and c) participated in 10 community events including the District's Hispanic Heritage Kick-off event to engage LEP/NEP residents in the Latino community. While DCHR did not report hosting training for staff in FY18, the agency collaborated with OHR to offer three language access compliance training sessions for District government employees through its Center for Learning and Development.

Additionally, DCHR took proactive measures in FY18 to provide job training and resources for LEP/NEP residents by partnering with the Mayor's Office on Latino Affairs. As stated in DCHR's FY19/20 Biennial Language Access Plan, OHR encourages the agency to continue efforts to support LEP/NEP job seekers and offer multilingual job readiness training through partnerships with the Mayor's Offices on African, Asian & Pacific Islander, and Latino Affairs.

In FY19, OHR looks forward to partnering with the DCHR to provide citywide guidance and support for agencies relating to attracting, hiring, and certifying qualified bilingual employees.



DC | DEPARTMENT of HUMAN SERVICES



## preparedness

4/5

DHS met planning and reporting requirements in FY18, and provided language access training to staff. In FY19, DHS needs to train grantees and contractors and ensure that they meet language access compliance requirements.

## accessibility

3/4

DHS translated 117 vital documents, and conducted targeted outreach to engage LEP/NEP communities. Translated documents are still not centralized on the DHS website, and a language support page is not available.

## quality

2/5

No language access public complaints were filed against DHS in FY18. OHR issued one determination of noncompliance against DHS in FY18. 14 out of 15 telephone tests and 2 out of 19 in person testers did not receive language assistance.



### In-Person Tests

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



### Telephone Tests

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

### FY18 Top Languages Encountered:

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

In FY18 language access field tests indicated that interpretation rates fell from 28 out of 34 tests (84%) in 2017 to 13 out of 29 tests (45%) in 2018. Although interpretation rates on in-person tests remained about the same in both years, there was a large decrease in the number of telephone testers who received interpretation in FY18. Only one out of 15 phone tests at DHS resulted in interpretation, and out of 8 testers who reached an automated menu only one was connected to a live employee. The remaining seven were transferred to a voicemail or were placed on hold for over 20 minutes. Follow-up calls conducted by testers who failed to reach a live employee yielded the same results.

While the rate of interpretation provided to testers decreased, the percentage of tests in which testers reported seeing language access signage increased from 13 out of 19 (68%) in FY17 to 11 out of 14 (79%) in FY18.

In FY18, DHS reported a) delivering three language access compliance trainings for 310 frontline staff; b) translating 117 vital documents including 33 notices, fact sheets, and announcements into Spanish (18), Amharic (6), Vietnamese (4), Chinese (3), and French (2); and c) participating in 10 community-based events to engage LEP/NEP residents.

While DHS indicates it is making ongoing improvements through the establishment of a Language Access Customer Advisory Group, language assistance still remains a challenge. DHS' FY19/20 Biennial Language Access Plan has several compliance requirements to implement over the two-year period to address ongoing concerns with the quality of services afforded to LEP/NEP customers. In addition to developing a comprehensive plan for ongoing staff training, monitoring grantee and contractor compliance, and fulfilling website accessibility requirements, DHS needs to evaluate the effectiveness of its automated telephone response system, and address the barriers it presents to LEP/NEP callers.

Finally, given the large number of LEP/NEP residents DHS encounters annually, OHR urges the agency to invest in creating a strong language access program that ensures internal capacity meets the full range of language access compliance.

# | Department of Motor Vehicles |

11/14

overall compliance



**In-Person Tests**  
11 out of 12 in-person tests provided the requested service, information, or appropriate resources.



**FY18 Encounters**  
3,299

**preparedness**

5/5

DMV met planning and reporting requirements in FY18 and provided extensive language access compliance training for frontline staff and managers.

**FY17 Score: 8/14**

**FY18 Top Languages Encountered:**

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

**accessibility**

3/5

DMV translated 5 vital documents and case-specific documents in multiple languages and met signage requirements. In FY19, DMV needs to meet outreach requirements and take steps to engage LEP/NEP communities.

OHR congratulates the Department of Motor Vehicles (DMV) on the agency's FY18 language access field test scores in which overall interpretation rate rose from 16 out of 20 (80%) in FY17 to 11 out of 12 (92%) in FY18. In addition to receiving prompt interpretation services, testers also reported seeing language access signage in 11 out of 12 tests. The DMV also provided translated documents in the appropriate language in 58% of tests, more frequently than any other agency tested.

DMV's FY18 implementation report indicates that the agency delivered both monthly and weekly language access compliance training for center for managers and frontline staff and added a language access module to its weekly training and orientation for new hires. DMV also translated adjudication-related documents as well as five documents ("Real ID Customer Handbook," "Limited Purpose Acceptable and Required Documents," "Final Excise Tax Exemption," and "DC DMV DL ID Form") into Spanish, Amharic, French, Chinese, Korean and Vietnamese.

**quality**

2/5

No language access complaints were filed against DMV in FY18. OHR issued 2 determinations of noncompliance against DMV in FY18. DMV has made significant efforts in FY18 to address compliance gaps and improve services for LEP/NEP customers.

OHR applauds DMV for focused and consistent efforts in FY18 to fulfill the full scope of language access compliance requirements and improve the agency's accessibility to LEP/NEP customers. In FY19, OHR looks forward to supporting the agency in achieving its FY19/20 Biennial Language Access Plan goals of hiring bilingual staff, certifying the language proficiency of bilingual employees currently serving customers in public facing positions, and engaging LEP/NEP communities. OHR encourages DMV to partner with the Mayor's Offices on African, Asian & Pacific Islander, and Latino Affairs, as well as the DC Language Access Coalition, to satisfy outreach requirements and maintain ongoing communication with language-specific LEP/NEP communities.



## preparedness

4/5

DPR met reporting requirements in FY19. While DPR trained new hires and invited OHR to present on language access during an all staff event, the agency has failed to provide comprehensive training for frontline staff.

## accessibility

4/4

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

## quality

2/5

No complaints were filed against DPR in FY18. All 7 telephone testers were denied language assistance during FY18 field tests. Despite DPR's efforts to meet the full range of language access compliance requirements, significant barriers remain to be addressed.



FY18 Encounters  
58



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

## FY18 Top Languages Encountered:

Spanish, Mandarin, Arabic, French, Vietnamese, Korean, German

DPR's FY18 language access implementation report indicates that the agency conducted extensive outreach to diverse LEP/NEP populations by hosting and attending a variety of community-based events, and by promoting DPR programs using language-specific media outlets. The citywide English Learner's Back to School Fair, a job fair hosted in partnership with the Mayor's Office on Latino Affairs, and immigrant heritage fairs are examples of culturally-specific events DPR participated in over the course of FY18. OHR commends DPR for working collaboratively with other agencies and community-based partners to directly engage and serve LEP/NEP residents. DPR also reported translating four vital documents into Spanish, two into Vietnamese, and a fact sheet on reduced rates into Amharic, Chinese, French and Spanish.

While DPR's outreach efforts are exemplary, FY18 language access test results indicate that DPR failed to provide interpretation services in all seven tests in which testers called DPR's Customer Service Center, and its Raymond and Petworth Recreation Centers. DPR employees made an attempt to provide interpretation in only one out of seven phone tests and testers reported multiple intentional hang-ups on the part of agency employees.

Given these results, OHR urges DPR to take immediate action in FY19 to provide comprehensive language access compliance training for all frontline employees. Field test results continue to show, year after year, that DPR staff are not equipped to serve LEP/NEP customers, and that the agency's efforts to notify staff of language access requirements during all staff meetings are not effective.

Finally, OHR notes that DPR's reported encounters with LEP/NEP customers decreased from 1781 in FY17 to 58 in FY18. In addition to addressing ongoing challenges with meeting training compliance requirements, DPR needs to identify and address additional barriers preventing LEP/NEP from accessing DPR services that explain the discrepancy between the agency's outreach and the limited encounters.



# | Department of Public Works |



**“The Preferred Choice”**



FY17 Score  
12/14



FY18 Encounters  
490

## preparedness

5/5

DPW met planning and reporting requirements and collected comprehensive data on LEP/NEP encounters. While the DPW did not report training staff in FY18, it fully met training requirements in FY17.

## accessibility

3/4

DPW translated 4 vital documents in FY18 and uploaded translated documents on its website. DPW did not report any outreach efforts in FY18. In FY19, DPW needs to address this gap and proactively engage LEP/NEP residents and business owners.

## quality

3/3

No complaints were filed against the agency in FY18. DPW was not tested in FY18.

### FY18 Top Languages Encountered:

Spanish, French, Mandarin, Amharic, Pashto, Arabic

The Department of Public Works (DPW) continues to make steady efforts to meet language access compliance requirements. Because DPW received consistently high scores on language access field tests for two years in a row, the agency was not tested in FY18.

In FY18, DPW reported 490 encounter with LEP/NEP individuals based on data gathered from telephonic interpretation usage reports and a tally of interactions in which bilingual staff directly assisted LEP/NEP customers. This is a notable increase from 328 encounters reported in FY17, and from 202 encounters reported in FY16, indicating that the agency’s ongoing efforts to improve data collection are yielding results.

DPW’s FY18 language access implementation report indicates that the agency translated four vital documents. These include a “New Resident Guide,” a “Zero Waste DC” notice, and an overview of the agency which were translated into Spanish; and a notice on recycling which was translated into Spanish, Amharic, Chinese, French, Vietnamese and Korean. These documents were uploaded on the agency’s website.

As recommended in FY17 and indicated in the agency’s FY19/20 Biennial Language Access Plan, DPW needs to expand outreach efforts to engage diverse LEP/NEP communities in the District and follow through on longstanding plans to provide linguistically targeted workshops for LEP/NEP residents and business owners. The agency also needs to certify the language proficiency of bilingual staff who currently serve in public contact positions.



**preparedness**

0/5

DSLBD failed to comply with FY18 reporting and planning requirements.

**accessibility**

0/5

DSLBD has failed to document any efforts in FY18 to fulfill accessibility requirements

**quality**

2/5

No language access public complaints were filed against DSLBD in FY18. 2 out of 5 telephone testers did not receive language assistance. DSLBD is violation of the Language Access Act.



FY17 Score  
3/14



FY18 Encounters  
N/A

**FY18 Top Languages Encountered:**

Spanish, Amharic, Korean, Mandarin, French

OHR has not received language access implementation reports from the Department of Small and Local Business Development (DSLBD) since FY16. The agency also failed to fulfill legally mandated planning requirements and did not submit a Biennial Language Access Plan for the FY19/20 period.

FY18 language access field results indicated that the 3 out of 5 testers who called DSLBD received interpretation services. While one tester who called the agency's Main Office was put on hold for more than five minutes, another tester was denied interpretation services by an employee who refused to provide language assistance.

# | Department of Disability Services |



## preparedness

5/5

DDS reported comprehensive data on LEP/NEP encounters, provided language access compliance training for contractors, and met all reporting requirements.

## accessibility

4/4

DDS translated vital documents including case-specific documents, and participated in 24 community outreach events.

## quality

4/5

No language access public complaints were filed against DDS in FY18. One telephone tester who called the Developmental Disabilities Administration did not receive language assistance. DDS continues to make efforts to meet language access compliance requirements.



### In-Person Tests

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



### Telephone Tests

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

**FY17 Score:** 11/14 **FY18 Encounters:** 494

### FY18 Top Languages Encountered:

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

OHR applauds the Department on Disability Services (DDS) for receiving one of the highest interpretation rates in both FY17 (82%) and FY18 (91%) language access field tests. All 5 in-person testers received interpretation services in FY18 tests, all except one reported seeing language access signage, and one tester received documents in the test language. Only the Mandarin phone tester who called the Developmental Disabilities Administration (DDA) failed to receive interpretation services, as he was put on hold by an agency employee for over 20 minutes.

In FY18, DDS: a) met planning and reporting requirements; b) trained 99 contractors and two new hires on language access compliance requirements; c) translated 31 case-specific documents and a “Youth Transition” brochure and postcard into Spanish; and d) participated in 24 citywide and community-based events.

DDS also reported comprehensive data on FY18 encounters with LEP/NEP individuals. Reported data relies on a variety of sources including assistance provided via telephonic interpretation services, in-person interpreters, and bilingual staff; as well as LEP/NEP individuals tracked in the agency’s customer tracking and through sign-in sheets. However, OHR notes the significant decline in encounters (494) reported in FY18 which is close to half of the encounters (864) reported in FY17.

OHR encourages DDS to train and closely monitor public-facing contractors and bilingual staff to ensure accurate reporting of LEP/NEP encounters in FY 19. Additionally, DDS can ensure its proactive community engagement reaches LEP/NEP residents by developing targeted language-specific outreach and strategies in partnership with the Mayor’s Offices on African, Asian & Pacific Islander, and Latino Affairs, as well as the DC Language Access Coalition. Finally OHR urges DDS to take immediate steps to revise its language access policy and certify the language proficiency of all bilingual staff in public-facing positions currently providing language access to customers.



District Department of Transportation



FY18 Encounters  
125



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

## FY18 Top Languages Encountered:

Spanish, Vietnamese, Korean, Bengali, French, Arabic, Mandarin, Mongolian

The District Department of Transportation (DDOT) has a long track record of taking proactive steps to meet language access compliance requirements, and provides recurring training to ensure its employees are equipped to serve LEP/NEP. DDOT was one of two agencies selected for language access field testing for the first time in FY18. Test results indicated that interpretation services were provided in four out of five telephone tests (80%) conducted at DDOT's main office in five different languages.

In FY18, DDOT: a) met planning and reporting requirements; b) trained 62 staff and Safety and Traffic Control Officers on how to comply with language access requirements and use telephonic interpretation services to better communicate with LEP/NEP individuals; c) produced a total of 30 translated vital documents (14 in Spanish, 5 in Amharic, 3 in Chinese, 3 in Korean, 3 in Vietnamese, and 2 in French) including resident notices, signage posters, and questionnaires; and d) ensured that all written documents contained multilingual taglines instructing readers to request free translation and interpretation services.

DDOT's FY18 implementation report indicates that the agency continues to make efforts to develop an effective mechanism for collecting data on LEP/NEP encounters from Traffic Control Officers and Safety Technicians. LEP/NEP encounters reported in FY18 are, once again, significantly lower than they were during previous reporting periods, decreasing dramatically from 1688 in FY16, to 317 in FY17, and to 125 in FY18. Given this trend, OHR encourages DDOT to take immediate steps in FY19 to assess current data collection practices and identify new strategies for tracking the agency's contact with LEP/NEP individuals.

Additionally, OHR recommends that DDOT equally prioritize a) improvements in its outreach to LEP/NEP stakeholders; b) centralizing translated vital documents on its website; c) increasing language access signage across locations; and d) improving the agency's linguistic and cultural competency by working with the Mayor's Constituency Offices and the DC Language Access Coalition to attract and hire qualified bilingual employees in public-contact positions.

11/14

overall compliance score

## preparedness

5/5

DDOT met FY18 planning and reporting requirements, and provided language access training for 62 employees.

## accessibility

2/4

DDOT produced 30 translated vital documents in FY18 and met language access signage requirements. In FY19, DDOT needs to meet outreach and website accessibility requirements.

## quality

4/5

No language access public complaints were filed against DDOT in FY18. The agency was tested in FY18, and 1 out of 5 testers did not receive language assistance.

# | District of Columbia Housing Authority |



FY18 Encounters  
167



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

## preparedness

1/5

DCHA failed to meet reporting and planning requirements in FY18.

FY17 Score: 7/14

### FY18 Top Languages Encountered:

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

## accessibility

1/4

With the exception of meeting signage requirements, DCHA has failed to document any efforts in FY18 to fulfill accessibility requirements.

The DC Housing Authority (DCHA) failed to fulfill planning and reporting requirements in FY18.

The FY18 field testing results indicated that eight out of 13 telephone tests conducted at DCHA properties did not receive language assistance. Testers who called Claridge Towers, Harvard Towers, and Garfield Terrace reported multiple instances in which employees intentionally disconnected their call and/or refused to provide interpretation services. In some cases, testers reported that employees at these locations were rude or acted unprofessionally toward them. In the case of Claridge Towers, none of the testers received interpretation services.

While the experience of testers who called DCHA's Customer Call Center were generally more positive, overall FY18 test results indicate that the agency is in violation of the Language Access Act, and is denying LEP/NEP residents their right to language assistance.

## quality

2/5

No language access public complaints were filed against DCHA in FY18. 8 out of 13 telephone testers were denied language assistance. DCHA is in violation of the Language Access Act.

These test results confirm that the discriminatory practices against LEP/NEP residents at DCHA properties, and the barriers to access reported in public language access complaints filed at OHR continue to persist. Furthermore, they indicate that the corrective actions taken by DCHA thus far have failed, and that the agency missed several opportunities to take decisive action to comply with its responsibilities under the law. OHR urges DCHA to take immediate steps to revise its language access policy and certify the language proficiency of all bilingual staff in public-facing positions currently providing language access to customers.



FY17 Score  
11/12



FY18 Encounters  
31

**preparedness**

5/5

DCLB met planning and reporting requirements in FY18, delivered language access compliance training for frontline staff, and adopted a new data collection mechanism.

**accessibility**

4/4

DCLB translated 4 vital documents, conducted outreach to Spanish and Korean-speaking LEP/NEP communities, and created a 'language support' feature on its website.

**quality**

3/3

No language access public complaints were filed against DCLB in FY18. The agency was not tested in FY18. DCLB fully met language access compliance requirements in FY18.

**FY18 Top Languages Encountered:**

Spanish, Korean, Amharic, Tagalog, Mandarin, Vietnamese

The DC Office of Lottery and Charitable Games (DCLB) worked actively in FY18 to satisfy the full range of language access compliance requirements, and continued to demonstrate a firm commitment to meeting the needs of the District's LEP/NEP population.

DCLB's FY18 implementation report indicates that the agency a) delivered an OHR-led language access compliance training for frontline staff; b) conducted outreach to Spanish-speaking and Korean-speaking residents by participating in and sponsoring community events; c) translated four vital documents including a "Raffle Application," "Cash Fiesta Scratch Ticket Instructions," and a "Supplier Application" into Spanish and a notice on "ADA Rulemaking" into Korean; d) uploaded translated documents to the website and disseminated them through language-specific media outlets; and d) created a "language support" feature on the agency's website with a description of its services and programs in six languages.

In addition to these achievements, DCLB further strengthened the agency's preparedness to serve LEP/NEP customers by implementing new data collection strategies to track primary language spoken by retailers and customers, certifying language proficiency of bilingual staff, instituting use of dual handset phones for telephonic interpretation in its Prize Center, and creating a language access portal on the agency's intranet.

In FY19, OHR looks forward to supporting the agency in meeting its LEP/NEP community engagement, website accessibility, and bilingual certification and hiring goals as outlined in its FY19/20 Biennial Language Access Plan.

# | District of Columbia Office of Zoning |



FY17 Score  
11/12



FY18 Encounters  
6

**preparedness**  
5/5

DCOZ met FY18 planning and reporting requirements and delivered language access compliance training to all staff.

**accessibility**  
4/4

DCOZ translated two vital documents in FY18, both of which were uploaded to the agency's website. The agency participated in an event targeting LEP/NEP residents.

**quality**  
3/3

No language access public complaint were filed against DCOZ in FY18. The agency was not tested in FY18. DCOZ continues to meet the full scope of language access compliance requirements.

## FY18 Top Languages Encountered:

Spanish and Vietnamese

The Office of Zoning (DCOZ) continues to sustain a high level commitment to language access implementation and continues to meet the full scope of language access compliance requirements.

In FY18, DCOZ fully met planning, reporting, and preparedness requirements. The agency took proactive steps to achieve agency-wide compliance with language access training requirements by hosting two OHR-led trainings, and by ensuring that new hires were trained through DCHR's Center for Learning and Development. The agency also ensured that language access signage was appropriately displayed in public facing locations.

DCOZ's FY18 report indicated that in FY18, the agency: a) translated the "Residential Zone (R) Zones R-1-A Zone" vital document into Spanish and French, and the "Zoning Appeals" guide into six languages; b) uploaded all translated documents to the agency's website; and c) engaged diverse LEP/NEP residents about DCOZ's work at the "Taste of the World" intergovernmental community outreach event hosted by the Department of Parks and Recreation.

DCOZ continues to report limited interactions with LEP/NEP stakeholders, and states that it receives only a handful of calls that require language assistance over the course of the fiscal year. In FY19, DCOZ needs to continue efforts to reach LEP/NEP communities, OHR looks forward to supporting DCOZ in the implementation of the outreach strategies identified in its FY19/20 Biennial Language Access Plan, and encourages the agency to leverage the relationships and expertise of the Mayor's Constituency Offices, the DC Language Access Coalition, and other immigrant-serving organizations to achieve its LEP/NEP community engagement goals.



FY17 Score  
5/12



FY18 Encounters  
1,710

**preparedness**  
3/5

DCOA met planning and reporting requirements in F18 and provided language access compliance training for frontline staff. In FY19, DCOA needs to adopt a language access policy and ensure that its grantees comply with the Language Access Act.

**accessibility**  
2/4

DCOA conducted outreach to LEP/NEP seniors in FY18. In FY19, the agency needs to expand outreach efforts, translate vital documents, and ensure translated documents are uploaded on the agency's website.

**quality**  
3/3

DCOA was not tested in FY18, and no complaints were filed against the agency. DCOA made efforts to address compliance gaps in FY18 but needs to accelerate implementation efforts in FY19.

## FY18 Top Languages Encountered:

Spanish, Mandarin, Amharic, Korean, Vietnamese, French, Arabic, Haitian Creole, Farsi

While the DC Office on Aging (DCOA) successfully met planning and reporting requirements in FY18, the agency needs to make efforts in FY19 to address critical gaps in compliance and reinstate a strong language access program.

In FY8, DCOA delivered one language access training session attended by frontline staff and managers, and engaged LEP/NEP seniors in the Asian & Pacific Islander and Latino communities by participating in community events. DCOA also reported active efforts to ensure compliance with signage requirements, and to convene grantees and providers to ensure that they comply with the Language Access Act.

OHR notes that while DCOA made slight improvements in FY18 and sought technical assistance and support to address compliance gaps, the agency needs to dedicate the capacity and resources to implement the full scope of language access compliance requirements.

In FY19, OHR urges DCOA to bring the agency into compliance by taking immediate steps to implement corrective actions outlined in the agency's FY19/20 Biennial Language Access Plan. Notably, DCOA should:

1. Engage and train grantees on language access compliance requirements, particularly as it relates to collecting and reporting reliable data on LEP/NEP encounters;
2. Develop and adopt a comprehensive language access policy; and
3. Partner with the Mayor's Constituency Offices and the DC Language Access Coalition to increase participation of LEP/NEP seniors in DCOA programs and services through its Ambassadors Training program and to identify opportunities for reaching the District's diverse LEP/NEP senior population;
4. Translate vital documents such as DCOA's brochure, "Long-term Care Guide" into top languages encountered and place links to all translated external documents in the "language support" section of its website.



# | District of Columbia Public Library |



DCPL met planning and reporting requirements in FY18, trained new hires, and took steps to ensure contractors comply with language access requirements. In FY19, DCPL needs to provide comprehensive training for all branch employees in public contact positions.



DCPL translated vital documents, and engaged diverse LEP/NEP communities through language-specific programming and targeted outreach.



4 out of 9 telephone testers did not receive interpretation services in FY18. No language access public complaints were filed against DCPL in FY18. DCPL continues to make efforts to fully satisfy language access compliance requirements.



**In-Person Tests**  
7 out of 7 in-person tests provided the requested service, information, or appropriate resources.



**Telephone Tests**  
4 out of 9 telephone tests provided the requested service, information, or appropriate resources.

## FY18 Top Languages Encountered:

Spanish, Amharic, Mandarin, French, Arabic, Russian, Farsi, Hindi, Romanian, Korean

Language access field tests conducted for the first time at the DC Public Library (DCPL) in FY18 indicated that interpretation services were provided in 11 of 16 tests. Interpretation services were provided in all seven (100%) of the in-person tests, but were only provided in four of the nine (44%) telephone tests. At Shepherd Park library, none of the three phone testers received interpretation services, and only during one phone test did an employee attempt to provide language access. Visible language access signage was reported in all in-person tests, but none of the testers received documents in their test language.

DCPL's language access implementation report indicates that in FY18, the agency: a) revised its language access policy; b) provided training for new hires and reminded staff about language access requirements during the agency's all staff retreat; c) translated key vital documents including program materials, a "Welcome to DCPL Brochure," the "Library Card Application Form," and a "Strategic Plan Summary" into six languages; d) conducted extensive outreach and offered targeted in-language programming to engage LEP/NEP residents; and e) created an internal database of all translated documents to ensure easy access for staff. DCPL also reported taking important steps in FY18 to ensure that contractors comply with their responsibilities under the Language Access Act by creating a contractor brochure outlining language access compliance requirements, and by inserting compliance requirements into MOUs as well as procurement and contracting documents.

As captured in DCPL's FY19/20 Biennial Language Access Plan, the agency needs to take immediate steps in FY19 to provide comprehensive language access training for public contact staff. While all in-person testers received interpretation services, telephone test results suggest that library staff are not equipped to provide language assistance over the phone. OHR encourages DCPL to take swift action in FY19 to ensure that all branch-level employees receive in-depth training and are equipped to serve LEP/NEP customers. Other outstanding compliance areas DCPL needs to prioritize in FY19 include certifying language proficiency of bilingual staff and improving linguistic accessibility of its website.



## preparedness 3/5

DCPS met planning and reporting requirements, but did not meet training requirements in FY18. DCPS should provide language access compliance training for all public contact staff, adopt a language access policy, and ensure that grantees and contractors fulfill compliance requirements.

## accessibility 3/4

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

## quality 2/5

No language access public complaints were filed against DCPS in FY18. 19 out of 39 testers did not receive language assistance in FY18. DCPS continues to be in noncompliance with core requirements of the Language Access Act, and needs to take proactive steps in FY19.



DISTRICT OF COLUMBIA  
PUBLIC SCHOOLS



### In-Person Tests

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



### Telephone Tests

5 out of 21 telephone tests provided the requested service, information, or appropriate resources.

### FY18 Top Languages Encountered:

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

Language access field tests conducted at DC Public Schools (DCPS) indicated that interpretation services were provided in 20 out of 39 (51%) tests. DCPS employees provided interpretation in 15 out of 18 (83%) in-person tests and 5 out of 21 (24%) telephone tests. Brightwood and Cardozo education campuses were the best performing tests sites, as each provided interpretation in 100% of tests. Coolidge and Roosevelt high schools were the worst performing tests sites. These sites performed especially poorly on phone tests, as neither provided language access to any testers over the phone.

In FY18, DCPS: a) delivered eight presentations on language access compliance requirements; b) engaged LEP/NEP families through 45 school-based fairs and parent workshops as well as citywide events such as the DCPS-hosted English Language Learners' Back to School Fair attended by 1,600 English Learners; and c) translated vital documents. DCPS' report also states that the agency is restructuring its language access work by establishing a dedicated Language Access Unit and by allocating resources needed to improve language access implementation and services to LEP/NEP families.

However, FY18 test results once again indicate that school personnel are not fully equipped to serve English Language Learners (ELLs) or LEP/NEP families. Despite the slight improvement in FY18, test results also revealed schools are not consistently displaying language access signage.

OHR urges DCPS to take immediate steps in FY19 to meet language access training requirements and ensure that all public contact staff throughout the school system including teachers, administrators, and support staff receive in-person training. DCPS should also provide a comprehensive report on steps the agency has taken thus far to implement corrective actions relating to training of school personnel and development of a comprehensive language access policy. Finally, OHR requests that DCPS certify all bilingual staff it currently relies on for provision of language access, and ensure that they track and report all encounters with LEP/NEP students and families.

# | Fire and Emergency Medical Services Department |

**11/12**  
overall  
compliance  
score



FY17 Score  
11/12



FY18 Encounters  
114

## preparedness

5/5

FEMS met all planning and reporting requirements in FY18, certified bilingual employees, and trained public contact staff, new hires, and contractors.

## accessibility

4/4

FEMS translated 1 vital document into Spanish in FY18, and participated in 2 community events. In FY19, FEMS needs to upload translated documents on its website and expand outreach efforts.

**quality**  
2/3

No language access public complaints were filed against FEMS in FY18, and the agency was not tested. OHR issued one determination of noncompliance against FEMS in FY18. The agency continues to show improvements in language access implementation.

## FY18 Top Languages Encountered:

Spanish, Amharic, Mandarin, Vietnamese, Hindi, Korean, Polish, Portuguese

The DC Fire and Emergency Medical Services (FEMS) continues to demonstrate steadfast commitment to language access implementation and took proactive steps in FY18 to ensure the agency is fully prepared to serve LEP/NEP customers.

FEMS' FY18 language access implementation report indicates that the agency delivered language access compliance training to a total of 224 employees and contractors. 150 FEMS employees received in-person training, 63 were trained via an online module, and 11 contractors attended an OHR-led training informing them of their legal obligations under the Language Access Act. The agency also adopted a comprehensive language access policy, issued detailed guidance to frontline employees on use of language access service waivers, and institutionalized language access compliance training for new cadets and hires. OHR applauds FEMS for working diligently throughout the fiscal year to strengthen the agency's overall preparedness, and for ensuring that all first responders and contractors are equipped to serve LEP/NEP customers.

FEMS participated in two community events in FY18 to engage LEP/NEP residents, and translated its 'Cadet Recruitment' brochure into Spanish. As discussed during the development of the agency's FY19/20 Biennial Language Access Plan, OHR encourages FEMS to enhance its accessibility by centralizing all translated vital documents under the "language support" section of its website, and by developing effective LEP/NEP community engagement strategies through partnerships with the DC Language Access Coalition, community-based organizations, and the Mayor's Offices on African, Asian & Pacific Islander, and Latino Affairs.

# Homeland Security and Emergency Management Agency



FY17 Score  
11/12



FY18 Encounters  
18

## preparedness

5/5

HSEMA met FY18 planning and reporting requirements, and trained all staff on language access compliance.

## accessibility

4/4

HSEMA conducted extensive outreach to LEP/NEP communities in FY18 and translated 3 vital documents into Spanish. HSEMA can improve accessibility by promoting its multilingual "Ready DC" website more widely.

## quality

3/3

No public complaints were filed against HSEMA in FY18. The agency was not tested in FY18. HSEMA made significant efforts to meet language access compliance requirements in FY18.

## FY18 Top Languages Encountered:

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

HSEMA's FY18 implementation reports indicate that during the course of the fiscal year, the agency: a) ensured that all of the agency's employees received language access compliance training via an online training module; b) translated three vital documents into Spanish; and c) fulfilled outreach requirements by participating in community events targeting LEP/NEP residents including engaging LEP/NEP seniors at the Vida Senior Center, and English Language Learners at the Washington English Center. In addition to providing critical emergency preparedness guidance to residents in six languages via "Ready DC"'s multilingual website, HSEMA also placed targeted ads in community-based media outlets such as the *Washington Hispanic* and *El Tiempo* to disseminate critical information to LEP/NEP individuals in the Latino community.

HSEMA's goals for the FY19/20 Biennial Language Access Plan period include improving signage throughout the agency's public facing areas by placing welcoming multilingual video messages, and developing effective messaging in Spanish, Amharic, and Chinese for distribution during outreach activities and print ads in language-specific media outlets.

OHR looks forward to supporting HSEMA's proactive efforts to ensure that the District's LEP/NEP population can easily access multilingual emergency preparedness information, and encourages the agency to continue working the Mayor's Constituency Offices as well as the DC Language Access Coalition to promote its multilingual website, and strengthen overall community engagement efforts.

Finally OHR urges HSEMA to implement new data collection measures in FY19 to ensure all interactions with LEP/NEP individuals are accurately documented. LEP/NEP encounters reported in FY18 appear low, considering the level of community engagement and linguistically-targeted outreach reported for the fiscal year. Using multilingual sign-in sheets and requiring bilingual staff to consistently report interactions with LEP/NEP individuals are immediate steps HSEMA can take to address this gap.

# | Metropolitan Police Department |



**In-Person Tests**  
9 out of 9 in-person tests provided the requested service, information, or appropriate resources.



**FY18 Encounters**  
4,996

## preparedness

4/5

MPD met key preparedness requirements but needs to take immediate steps to train all MPD employees to ensure they are equipped to serve LEP/NEP individuals.

## accessibility

4/4

MPD displayed visible language access signage in public-facing locations, conducted extensive outreach, and translated 6 vital documents. Moving translated documents to the website will improve accessibility.

## quality

3/5

In FY18, 2 language access complaints and 2 inquiries were filed against MPD, and OHR issued one finding of noncompliance. The agency received a perfect score in FY18 testing and provided language assistance to all 9 testers.

## FY18 Top Languages Encountered:

Spanish, Amharic, Mandarin, Korean, French, Arabic, Portuguese, Vietnamese, Russian, Hindi

OHR congratulates the Metropolitan Police Department (MPD) on receiving a perfect score on language access field tests for the third year in a row. MPD continues to show improvements in language access implementation. The FY18 test results indicated that interpretation services were provided in all in-person tests conducted at the 2nd, 3rd, and 4th District stations, and that language access signage was visibly displayed in all three locations.

In FY18, MPD: a) collected and reported comprehensive data on its encounters with LEP/NEP individuals; b) participated in 54 culturally-specific community events throughout the city; c) translated a total of six vital documents including its "Chief of Police Appointment Request Card" and a "Robbery Alert" both of which were translated into six languages; d) delivered in-person language access training to 119 civilian employees and new recruits; and e) reminded police officers of language access compliance requirements during several roll calls throughout the fiscal year.

OHR urges MPD to take immediate action towards the following key priorities outlined in its FY19/20 Biennial Language Access Plan:

1. Roll out online training and ensure all MPD members receive comprehensive language access compliance training by the end of FY19;
2. Coordinate with its Communications Department, Special Liaison Units, the Mayor's Constituency Offices, and the DC Language Access Coalition to refine its LEP/NEP engagement strategies, and better reach LEP/NEP residents and businesses in the African community; and
3. Translate vital documents identified in FY17/18 BLAP and ensure translated documents are accessible under the language-specific tabs on MPD's website where in-language documents can be easily accessed by LEP/NEP readers.

Finally, OHR recommends that MPD assess the availability of translated vital documents at public contact locations, and their use by frontline staff.



FY17 Score  
4/12



FY18 Encounters  
6

## preparedness

1/5

OCP failed to meet planning, reporting, and training requirements in FY18. The agency does not have a language access policy.

## FY18 Top Languages Encountered:

Spanish, Amharic, Russian

## accessibility

1/4

With the exception of meeting signage requirements, OCP has failed to document any efforts in FY18 to fulfill accessibility requirements.

The Office of Contracting and Procurement (OCP) failed to fulfill FY18 reporting requirements or maintain communication with OHR's Language Access Program. As such, there is no evidence to suggest that the agency took corrective steps in FY18 to address longstanding gaps in language access compliance.

OCP also failed to submit a Biennial Language Access Plan (BLAP) for the FY19/20 planning period, or report on the status of action items outlined in its FY17/18 plan. OCP is therefore in violation of the Language Access Act.

## quality

2/3

No language access public complaints were filed against the OCP in FY18. The agency was not tested.

# | Office of Planning |



## preparedness

5/5

OP met preparedness requirements in FY18 by reporting data on LEP/NEP encounters and delivering language access compliance training for employees.

## accessibility

3/4

OP translated one vital document into Spanish in FY18 and met signage requirements. In FY19, OP needs to take proactive steps to meet translation and outreach requirements, and to ensure translated vital documents are available on the agency's website. OHR urges OP to address accessibility concerns in FY19.

## quality

2/3

No public complaint was filed against OP in FY18. The agency was not tested in FY18.



FY17 Score  
10/12



FY18 Encounters  
5

## FY18 Top Languages Encountered:

Spanish and Portuguese

The Office of Planning's (OP) FY18 implementation report indicates that the agency: a) delivered a language access compliance training in-house to inform employees about their responsibilities and resources available to them; b) translated one vital document into Spanish to provide a basic description of OP's programs and services; and c) made plans to hire a Communications Officer to standardize the agency's outreach and communication strategy.

While OP has successfully met key preparedness requirements, the agency has yet to develop an effective mechanism for engaging the District's diverse LEP/NEP community. OP's Language Line usage report indicates that OP employees used telephonic interpretation services in only five interactions over the course of FY18. Despite repeated recommendations from OHR to make deliberate efforts to engage LEP/NEP stakeholders, the agency's FY18 report does not reflect any intentional steps taken by OP to meet accessibility requirements.

OP's FY19/20 Biennial Language Access Plan outlines detailed action steps the agency will take over the two-year period to improve accessibility and connect LEP/NEP communities to upcoming citywide and neighborhood-based projects. OHR once again encourages OP to leverage the support of the Mayor's Offices on African, Asian & Pacific Islander, and Latino Affairs and community-based partners such as the DC Language Access Coalition to successfully implement these goals. Additionally, OP needs to develop and translate culturally targeted outreach materials to engage LEP/NEP stakeholders, and ensure that translated documents are accessible via the "language support" section on the agency's website.



FY17 Score  
8/12



FY18 Encounters  
4,340

**preparedness**

**3/5**

OTR reported comprehensive data on LEP/NEP encounters in FY18 and provided language access compliance training to 262 frontline employees. In FY19, OTR needs to adopt an internal language access policy and ensure timely submission of quarterly reports.

**accessibility**

**2/4**

OTR met language access signage requirements and acquired dual handset phones to facilitate telephonic interpretation for LEP/NEP customers. In FY19, OTR should translate vital documents and conduct outreach to LEP/NEP communities.

**quality**

**2/3**

No language access public complaints were filed against OTR in FY18. The agency was not tested in FY18. OTR needs to make significant efforts in FY19 to bring the agency into compliance with the Language Access Act.

**FY18 Top Languages Encountered:**

Spanish, Amharic, Korean, Mandarin, French, Vietnamese, Arabic, Tigrigna, Swahili, Farsi

In FY18, the Office of Tax and Revenue (OTR) implemented the use of dual handset phones for accessing telephonic interpretation services and began announcing customers' turns in English, Spanish, and Amharic. OTR also placed multilingual banners and "I Speak" cards in all public areas to inform LEP/NEP taxpayers of their right to language access services. OHR credits the agency for taking these steps in FY18 to create a welcoming service environment and encourages the agency to execute plans to use digital multilingual signage to better communicate its business process with LEP/NEP customers.

While OTR achieved a significant milestone in FY18 by providing language access compliance training for 262 frontline employees, the agency's implementation reports indicate that the agency failed to address longstanding compliance gaps relating 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.

OHR urges OTR to dedicate the requisite capacity and resources needed and work with OHR to identify a corrective plan for bringing the agency into compliance in FY19. As it stands, OTR has failed to meet essential accessibility and preparedness requirements of the Language Access Act.



# | Office of the People's Counsel |



## preparedness

5/5

OPC met all FY18 reporting planning, and training requirements, and provided comprehensive data on LEP/NEP encounters.

## accessibility

4/4

OPC met all FY18 accessibility requirements by producing 31 translated documents in and participating in 60 community events to reach LEP/NEP residents in the African, Asian, and Latino communities.

## quality

3/3

No language access complaints were filed against OPC in FY18. The agency was not tested in FY18. OPC continues to demonstrate exceptional commitment to serving LEP/NEP residents.



FY17 Score  
12/12



FY18 Encounters  
6

### FY18 Top Languages Encountered:

Spanish, Amharic, Mandarin, Korean, Vietnamese, Tagalog, French, Portuguese

The Office of the People's Counsel (OPC) once again exceeded language access compliance requirements and continues to model best practices for authentic community engagement and accessible government.

In FY18, OPC provided comprehensive data on the agency's interactions with LEP/NEP residents by pulling from bilingual staff interactions with LEP/NEP customers, identifying LEP/NEP individuals tracked in the agency's customer tracking system, and reporting usage of in-person and telephonic interpretation services. OPC also reported participating in 60 community events through which the agency intentionally targeted the District's diverse LEP/NEP populations. Bilingual staff attended neighborhood meetings, job fairs, and open markets in the Latino, African, and Asian communities, and engaged LEP/NEP residents through the Mayor's Constituency Offices, faith-based organizations, and schools. Additionally, OPC translated 31 vital documents in FY18, including two informational documents for consumers that were translated into six languages.

OHR commends OPC for its unwavering commitment to language access implementation, and for ongoing efforts to build the organization's cultural and linguistic capacity. As OPC takes steps to encourage qualified bilingual candidates to apply for public contact positions, OHR encourages the agency to certify its bilingual staff and test language skills of new hires.

In FY19, OHR looks forward to supporting OPC in identifying creative strategies for communicating more effectively with diverse LEP/NEP residents, piloting innovative multilingual education and awareness campaigns, and facilitating in-depth cultural competency training for OPC staff.



**preparedness**  
5/5

OSSE successfully met FY18 preparedness requirements by reporting comprehensive data on LEP/NEP encounters and fulfilling reporting and planning requirements. In FY19, OSSE needs to expand training and grantee engagement efforts.

**accessibility**  
3/4

In FY18, OSSE translated 156 vital documents, adding them in the “language support” section of its website, and participated in 7 community events to engage LEP/NEP families. In FY19, OSSE needs to comply with language access signage requirements.

**quality**  
3/5

No language access public complaints were filed against OSSE in FY18. The agency has made significant improvements in language access implementation, but needs to ensure efforts are equally and consistently pursued across all divisions, programs, and grantees.



**Telephone Tests**  
9 out of 12 tests provided the requested service, information, or appropriate resources.



**FY18 Encounters**  
10,300

**FY18 Top Languages Encountered:**

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

In FY18, the Office of the State Superintendent of Education (OSSE) continued to meet important language access implementation milestones. The agency reported comprehensive data on encounters with LEP/NEP customers, including via bilingual staff, grantees and contractors, and the agency’s customer tracking software showing greater interaction with linguistically diverse populations and families in FY18 as compared to FY17.

OHR also credits OSSE for providing detailed information on language access compliance efforts across divisions and programs. OSSE’s FY18 accomplishments include: a) adopting a comprehensive language access policy; b) training 63 frontline staff and Division of Early Learning grantees; c) translating 156 vital documents into Spanish (46), Amharic (38), French (23), Vietnamese (20), Chinese (16), and Korean (13); d) making many of these documents available under the “language support page on OSSE’s website; and e) translating additional Early Intervention Program documents including individual education plans, progress reports, and correspondence with LEP/NEP families.

FY18 field testing results indicated that OSSE provided interpretation in 9 out of 12 tests (75%). This includes 4 out of 4 in-person tests (100%) and 5 out of 8 (63%) phone tests in which interpretation services were provided to testers. Tests also revealed language access signage and translated vital documents were not readily available at most test sites except for the Division of Early Learning Child Care Licensing Unit.

OSSE continues to show steady agency-wide progress to improve accessibility. However, as FY18 testing results illustrate, language access compliance levels vary across divisions and programs. OHR urges OSSE to take proactive steps in FY19 to train all divisions and grantees and audit all public-facing locations to ensure compliance with signage requirements. OHR also recommends that OSSE certify the language proficiency of all bilingual employees in frontline positions. This is a particularly important for OSSE, considering the agency’s significant reliance on bilingual employees and on culturally and linguistically competent grantees to communicate with the LEP/NEP customers it serves.

# | Office of the Tenant Advocate |



## preparedness

4/5

OTA met FY18 reporting and training requirements. In FY19, the agency needs to refine its data collection mechanism to ensure all LEP/NEP interactions are adequately tracked.

## accessibility

3/4

In FY18, OTA participated in 10 community outreach events and translated a tenant handbook into 3 languages. In FY19, OTA would benefit from translating vital document and from establishing strategic partnerships to reach the District's LEP/NEP tenant population.

## quality

5/5

No language access complaints were filed against OTA in FY18. All four telephone testers received prompt language assistance.



FY18 Encounters  
174



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

## FY18 Top Languages Encountered:

Spanish, Korean, Mandarin, Amharic, Farsi, Cantonese, German, Vietnamese, Arabic

OHR congratulates the Office of Tenant Advocate (OTA) for being one of three agencies tested in FY18 which provided interpretation on 100% of tests, and for being the only agency that provided interpretation on 100% of phone tests.

All four phone testers reported receiving professional interpretation services within an appropriate time frame. While one tester (Korean) received interpretation services from a bilingual employee, the other three testers (Arabic, Vietnamese, Amharic) received telephonic interpretation services through Language Line Solutions.

OTA's FY18 language access implementation reports indicate that the agency: a) delivered language access training in-house for 14 frontline staff; b) participated in 10 community events, two of which targeted LEP/NEP tenants in the Latino community; and c) translated the "Tenants 101 for Tenants and Realtors" handbook into Amharic, French, and Spanish. While OTA provided data on LEP/NEP encounters with bilingual staff, the agency did not report encounters in which telephonic interpretation services were provided. OHR has added these numbers to the total FY18 encounters of 174, which shows a significant decrease from 391 encounters reported in FY17.

OHR encourages OTA to take the following proactive steps in FY19 to strengthen data collection, LEP/NEP tenant engagement, and overall accessibility as outlined in the agency's FY19/20 Biennial Language Access Plan:

1. Update OTA's data management system and sign-in sheets, and institutionalize use of a bilingual staff log to collect and track LEP/NEP encounters;
2. Partner with the Mayor's Constituency Offices and the DC Language Access Coalition to jointly develop an effective outreach strategy for engaging LEP/NEP tenants;
3. Translate 3 key vital documents - OTA's intake form, the Tenants 101 handbook, and the Eviction FAQ - into Spanish, Amharic, French and Chinese, and provide links to translated documents in the "language support section" of the agency's website; and
4. Recruit and certify bilingual staff in public-facing positions.

The agency continued to show steady improvements in FY18.



FY17 Score  
14/14



FY18 Encounters  
7,706

## preparedness

2/5

OUC failed to fulfill reporting and training requirements in FY18. In FY19, OUC needs to submit comprehensive quarterly reports, train public-contact staff, and adopt a revised language access policy.

## accessibility

4/4

OUC met basic outreach, signage, and translation requirements in FY18. The agency can improve accessibility through partnerships and targeted campaigns to reach LEP/NEP populations.

## quality

2/3

In FY18, no language access complaints were filed against OUC, and the agency was not tested.

### FY18 Top Languages Encountered:

Spanish, Amharic, Mandarin, Fench, Vietnamese, Urdu, Russian, Korean, Arabic, German, Vietnamese, Arabic

The Office of Unified Communications (OUC) is considered a model agency for its proactive language access implementation and perfect compliance score for the last three fiscal periods. However, in FY18, the agency failed to meet basic compliance requirements and provided incomplete data on its language access implementation activities during the fiscal year. Reports submitted for the first three quarters of FY18 indicate that OUC participated in 13 community events to engage LEP/NEP populations and translated one vital document into Spanish.

According to telephonic interpretation usage reports obtained by OHR, OUC's encounters with LEP/NEP callers fell from 10,364 in FY17 to 7,706 in FY18. While this number is on par with OUC's average over the last five years, OHR advises the agency to examine its data collection practices to ensure interactions between bilingual call takers and LEP/NEP callers are routinely tracked. OUC previously reported employing 18 bilingual call takers and dispatchers who speak Spanish (14), Amharic (2), Farsi (1), and Yoruba (1). As outlined in OUC's FY19/20 Biennial Language Access Plan, OHR urges the agency to hire additional bilingual call center staff, certify language proficiency of new and existing hires, and join citywide effort to attract qualified bilingual applicants.

In addition to meet reporting, training, and document translation as priorities in FY19, OHR urges OUC to work closely with the Mayor's Constituency Offices, the DC Language Access Coalition, and MPD Special Liaison Units to develop targeted campaigns and effective communication strategies for reaching LEP/NEP populations. OUC can achieve its FY19/20 goal of promoting existing and new services such as Smart 911, Next Gen 911 and Text to 911/311 by working with partners to develop culturally and linguistically appropriate messaging and by better utilizing multilingual media outlets and platforms.



FY17 Score  
N/A



FY18 Encounters  
N/A

**preparedness**

0/5

DGS failed to meet planning, reporting, and training requirements in FY18. The agency does not have a language access policy and has not taken steps to train its large network of public-facing contractors.

**FY18 Top Languages Encountered:**

N/A

**accessibility**

0/4

DGS failed to report any efforts in FY18 to translate prioritized vital documents, provide a language support section on its website or conduct outreach to engage LEP/NEP communities.

In FY18, the Department of General Services (DGS) once again failed to meet reporting requirements mandated by the Language Access Act. OHR is therefore unable to assess the agency's ability to serve LEP/NEP customers.

DGS also failed to submit a Biennial Language Access Plan (BLAP) for the FY19/20 planning period, or report on action steps taken to implement FY17/18 compliance goals.

DGS is therefore in violation of the Language Access Act.

**quality**

2/3

No complaints were filed against DGS in FY18, and the agency was not tested. However, DGS is in violation of the Language Access Act and needs to take immediate steps to address compliance gaps.



FY17 Score  
9/12



FY18 Encounters  
1,259

## preparedness

4/5

DHCF met planning and reporting requirements and training in FY18. While the agency did not report training employees in FY18, the agency met this requirement in FY17. DHCF needs to adopt a language access policy in FY19.

## accessibility

2/4

While DHCF did not report translating documents in FY18, the agency produced 300 translated documents in FY17. The agency did not meet website accessibility or outreach requirements in FY18.

## quality

2/3

No complaints were filed against DHCF in FY18 and the agency was not tested. The agency has shown improvements overall but failed to meet basic requirements in FY18.

### FY18 Top Languages Encountered:

Spanish, Amharic, Mandarin, Cantonese, Portuguese, Bengali, Arabic, French, Tigrigna, Urdu

In FY18, the Department of Health Care Finance (DHCF) reported delivering 37 language access compliance trainings for its providers, and having 1259 encounters with LEP/NEP customers, 779 of whom received in-person interpretation services.

While DHCF's FY18 implementation report does not provide additional information on activities carried out in FY18 to comply with language access requirements, the agency's FY19/20 Biennial Language Access Plan outlines several compliance goals the agency will prioritize over the two-year period. These include: a) building a direct interface between its enrollment and claims processing systems to better capture language needs of individuals enrolled in Medicaid; b) establishing a workgroup to monitor compliance of providers and ensure the agency fulfills translation and website accessibility requirements; and c) developing a strategy for communicating with LEP/NEP residents through in-language media outlets.

OHR once again notes that DHCF needs to take immediate steps to develop a comprehensive language access policy, provide comprehensive language access training for staff, and create a "language support" section on the DHCF website to ensure that LEP/NEP customers can access a description of the organization and vital documents in their language. While DHCF has taken some steps in FY18 to engage providers, the agency has not made sufficient efforts to satisfy key requirements. OHR therefore encourages the agency to invest in creating the internal capacity needed to maintain consistent implementation efforts and active oversight of its large network of providers who interface with LEP/NEP residents on a daily basis.

# | Department of Youth Rehabilitation Services |



## preparedness

5/5

DYRS met planning and reporting requirements in FY18, provided language access compliance training for frontline staff, and engaged contractors to ensure that they comply with the Language Access Act.

## accessibility

3/4

In FY18, DYRS translated 4 vital documents into Spanish and created a “language support” page in Spanish on its website.

## quality

3/3

No language access public complaints were filed against DYRS in FY18. The agency was not tested in FY18.



FY17 Score  
11/12



FY18 Encounters  
106

## FY18 Top Languages Encountered:

Spanish and Tigrinya

In FY18, DYRS: a) met planning and reporting requirements; b) delivered language access compliance training for 54 employees including new hires and members of its leadership team; and c) translated four vital documents, including the “Parent/Guardian Consent Form” and a listing of DYRS Achievement Center’s classes into Spanish. DYRS’ FY18 implementation report also indicates that the agency has taken steps to ensure that grantees and contractors met their obligations under the Language Access Act and reported their encounters with LEP/NEP customers on an ongoing basis.

OHR credits DYRS for creating a “language support” section on its website in FY18. While the section currently only displays an overview of the agency’s programs and services in Spanish, OHR recommends that in FY19, the agency work to include additional languages widely spoken in the District. As discussed during the development of DYRS’ FY19/20 Biennial Language Access Plan, providing links to all translated vital documents in each language will ensure that LEP/NEP readers can easily find documents in their language.

OHR looks forward to supporting DYRS in the implementation of compliance goals slated for the FY19/20 compliance period. These include a) ensuring that grantees certify compliance with language access requirements in writing; b) updating DYRS’ language access policy to clearly outline grantee and contractor compliance responsibilities; c) monitoring public-facing locations to verify that language access signage is visibly displayed; d) actively informing LEP/NEP youth and families about their right to language access through events hosted by the Achievement Center, and e) continuing to strengthen the agency’s cultural and linguistic competence by certifying and hiring bilingual employees. In FY19, DYRS needs to meet outreach requirements by actively engaging LEP/NEP youth and families through events or targeted communication strategies.

# | Office of Administrative Hearings |



FY17 Score  
12/12



FY18 Encounters  
506

## preparedness

5/5

OAH met planning and reporting requirements, reported comprehensive data on FY18 encounters with LEP/NEP customers, and ensured that all OAH staff received language access compliance training.

## accessibility

4/4

OAH met language access signage requirements in FY18 and translated a customer service survey into Spanish. In FY19, OAH needs to translate vital documents into top languages encountered and add to its website.

## quality

3/3

No language access public complaints were filed against OAH in FY18. The agency was not tested in FY18.

## FY18 Top Languages Encountered:

Spanish, Amharic, Mandarin, Arabic, Tigrigna, Vietnamese, French, Portuguese, Farsi, Haitian Creole

The Office of Administrative Hearings (OAH) continues to take proactive steps to provide meaningful access to LEP/NEP customers and fulfill requirements of the Language Access Act. OHR applauds OAH for consistently meeting planning and reporting requirements in FY18, and for continuing to experiment with new approaches to enhance language access implementation within the agency.

In FY18, OAH a) instituted a new process for documenting frontline staff interactions with LEP/NEP customers, b) delivered language access compliance training specifically tailored to the needs of frontline staff and administrative law judges; c) ensured new hires received training within 30 days of their start date; and d) translated a customer service survey into Spanish. OAH also reported hiring two bilingual employees proficient in Spanish and Amharic.

As outlined in OAH's FY19/20 Biennial Language Access Plan, OAH can better meet accessibility requirements in FY19 by ensuring that key vital documents are translated into top languages encountered by the agency, and by making translated documents available on the agency's website.

OHR also encourages OAH to certify bilingual employees in public contact positions and continue working with the Mayor's Constituency Offices to attract and hire additional bilingual staff.

OAH continues to demonstrate exceptional commitment to serving LEP/NEP customers.





FY17 Score  
12/12



FY18 Encounters  
1,301

## preparedness

5/5

In FY18, CSSD met planning and reporting requirements, trained frontline staff, and worked with contractors to ensure they complied with language access requirements.

## accessibility

3/4

In FY18, CSSD updated language access signage throughout the agency and participated in a citywide event specifically targeting LEP/NEP families. In FY19, CSSD needs to translate vital documents and create a "language support" section on its website.

## quality

3/3

No language access public complaints were filed against CSSD in FY18. The agency was not tested in FY18.

## FY18 Top Languages Encountered:

Spanish, Amharic, French, Mandarin, Vietnamese, Cantonese, Bengali, Tigrigna, Creole, Korean, Russian

OHR commends the Office of Attorney General's Child Support Services Division (CSSD) for ongoing efforts to provide quality services to LEP/NEP customers, and to fully meet language access compliance requirements.

In FY18, CSSD reported comprehensive data on interpretation services provided to LEP/NEP customers via bilingual staff, telephonic interpretation services, and in-person interpreters. A total of 192 CSSD staff received language access compliance training in FY18, and the agency periodically reminded frontline employees to accurately record the language needs of each customer they serve. CSSD's FY18 implementation report also indicates that the agency updated language access signage in all public facing areas, and participated in the English Language Learner Back to School Fair to engage LEP/NEP families.

Key compliance goals outlined in CSSD's FY19/20 Biennial Language Access Plan include: a) certifying bilingual employees currently serving in public contact positions; b) ensuring that LEP/NEP customers receive automated correspondence and messages in their language; c) working closely with the Mayor's Constituency Offices and community-based partners to reach and communicate with LEP/NEP stakeholders; and d) translating and uploading prioritized vital documents to a "language support" section on the agency's website.

OHR recommends that CSSD take immediate steps in FY19 to better meet accessibility requirements and closely monitor its contractors in to ensure that they consistently comply with reporting and training requirements.

CSSD continues to make efforts to meet the full range of language access compliance requirements.

# Compliance Details

Agencies' scores are based on questions related to compliance with the Language Access Act. A 'x' indicates successful completion of the requirement. 'N/A' is where a particular question does not apply to the specific agency for FY18.

AGENCY NAME	ABRA	CFSA	DBH	DCRA	DOC	DOES	DOEE	DGS	DOH
<b>PREPAREDNESS</b>									
P1. Agency provided comprehensive data on FY18 encounters.	X	X	X	X	X	X	X		X
P2. Agency has a current language access policy.	X	X	X	X		X	X		X
P3. Agency staff were trained in FY18.		X	X			X	X		X
P4. Agency communicated effectively.	X	X	X	X	X	X	X		X
P5. Agency took steps to ensure grantee/contractor compliance.		X	X			X	X		X
<b>PREPAREDNESS SCORE</b>	<b>3</b>	<b>5</b>	<b>5</b>	<b>3</b>	<b>2</b>	<b>5</b>	<b>5</b>	<b>0</b>	<b>5</b>
<b>ACCESSIBILITY</b>									
A6. Agency displayed adequate signage in public facing locations.		X	X	X	X	X	X		X
A7. Vital documents were translated and/or updated in FY18.		X	X		X	X	X		X
A8. Translated vital documents are accessible on agency website.		X	X	X	X	X	X		
A9. Efforts were made to engage diverse LEP/NEP communities in FY18.		X	X	X	X	X	X		X
<b>ACCESSIBILITY SCORE</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>3</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>0</b>	<b>3</b>
<b>QUALITY</b>									
Q10. No language access public complaints were filed against the agency in FY18.	X	X	X	X	X	X	X	X	X
Q11. OHR has not issued a finding of non-compliance against the agency in FY18.	X	X	X	X	X	X	X	X	X
Q12. No tester was turned away during tests.		N/A	N/A		N/A		N/A	N/A	
Q13. All testers who accessed employee or interpretation received requested information or services.	X	N/A	N/A		N/A		N/A	N/A	X
Q14. OHR has observed improvement in LA implementation in FY18.		X	X			X	X		X
<b>QUALITY SCORE</b>	<b>3</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>2</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>4</b>
<b>TOTAL AGENCY SCORE</b>	<b>7</b>	<b>12</b>	<b>12</b>	<b>8</b>	<b>8</b>	<b>12</b>	<b>12</b>	<b>2</b>	<b>12</b>
<b>TOTAL POSSIBLE SCORE</b>	<b>12</b>	<b>12</b>	<b>12</b>	<b>14</b>	<b>12</b>	<b>14</b>	<b>12</b>	<b>12</b>	<b>14</b>

AGENCY NAME	DHCF	DHCD	DCHR	DHS	DMV	DPR	DPW	DSLBD	DDS	DDOT
<b>PREPAREDNESS</b>										
P1. Agency provided comprehensive data on FY18 encounters.	X	X	X	X	X	X	X		X	X
P2. Agency has a current language access policy.		X	X	X	X	X	X		X	X
P3. Agency staff were trained in FY18.	X		X	X	X		X		X	X
P4. Agency communicated effectively.	X	X	X	X	X	X	X		X	X
P5. Agency took steps to ensure grantee/contractor compliance.	X	X	X		X	X	X		X	X
<b>PREPAREDNESS SCORE</b>	<b>4</b>	<b>4</b>	<b>5</b>	<b>4</b>	<b>5</b>	<b>4</b>	<b>5</b>	<b>0</b>	<b>5</b>	<b>5</b>
<b>ACCESSIBILITY</b>										
A6. Agency displayed adequate signage in public facing locations.	X	X	X	X	X	X	X		X	X
A7. Vital documents were translated and/or updated in FY18.	X		X	X	X	X	X		X	X
A8. Translated vital documents are accessible on agency website.			X		X	X	X		X	
A9. Efforts were made to engage diverse LEP/NEP communities in FY18.		X	X	X		X			X	
<b>ACCESSIBILITY SCORE</b>	<b>2</b>	<b>2</b>	<b>4</b>	<b>3</b>	<b>3</b>	<b>4</b>	<b>3</b>	<b>0</b>	<b>4</b>	<b>2</b>
<b>QUALITY</b>										
Q10. No language access public complaints were filed against the agency in FY18.	X	X	X	X	X	X	X	X	X	X
Q11. OHR has not issued a finding of non-compliance against the agency in FY18.	X	X	X				X	X	X	X
Q12. No tester was turned away during tests.	N/A	X	N/A				N/A			
Q13. All testers who accessed employee or interpretation received requested information or services.	N/A	X	N/A	X	X		N/A	X	X	X
Q14. OHR has observed improvement in LA implementation in FY18.		X	X		X		X		X	X
<b>QUALITY SCORE</b>	<b>2</b>	<b>5</b>	<b>3</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>3</b>	<b>3</b>	<b>4</b>	<b>4</b>
<b>TOTAL AGENCY SCORE</b>	<b>8</b>	<b>11</b>	<b>12</b>	<b>9</b>	<b>11</b>	<b>10</b>	<b>11</b>	<b>3</b>	<b>13</b>	<b>11</b>
<b>TOTAL POSSIBLE SCORE</b>	<b>12</b>	<b>14</b>	<b>12</b>	<b>14</b>	<b>14</b>	<b>14</b>	<b>12</b>	<b>14</b>	<b>14</b>	<b>14</b>

# Compliance Details

Agencies' scores are based on questions related to compliance with the Language Access Act. A 'x' indicates successful completion of the requirement. 'N/A' is where a particular question does not apply to the specific agency for FY18.

AGENCY NAME	DCHA	DYRS	DCLB	DCOZ	DCOA	DCPL	DCPS	FEMS	HSEMA
<b>PREPAREDNESS</b>									
P1. Agency provided comprehensive data on FY18 encounters.		X	X	X	X	X	X	X	X
P2. Agency has a current language access policy.	X	X	X	X		X		X	X
P3. Agency staff were trained in FY18.		X	X	X	X			X	X
P4. Agency communicated effectively.		X	X	X	X	X	X	X	X
P5. Agency took steps to ensure grantee/contractor compliance.		X	X	X		X	X	X	X
<b>PREPAREDNESS SCORE</b>	<b>1</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>3</b>	<b>4</b>	<b>3</b>	<b>5</b>	<b>5</b>
<b>ACCESSIBILITY</b>									
A6. Agency displayed adequate signage in public facing locations.	X	X	X	X	X	X		X	X
A7. Vital documents were translated and/or updated in FY18.		X	X	X		X	X	X	X
A8. Translated vital documents are accessible on agency website.		X	X	X		X	X	X	X
A9. Efforts were made to engage diverse LEP/NEP communities in FY18.			X	X	X	X	X	X	X
<b>ACCESSIBILITY SCORE</b>	<b>1</b>	<b>3</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>4</b>	<b>3</b>	<b>4</b>	<b>4</b>
<b>QUALITY</b>									
Q10. No language access public complaints were filed against the agency in FY18.	X	X	X	X	X	X	X	X	X
Q11. OHR has not issued a finding of non-compliance against the agency in FY18.	X	X	X	X	X	X	X		X
Q12. No tester was turned away during tests.		N/A	N/A	N/A	N/A			N/A	N/A
Q13. All testers who accessed employee or interpretation received requested information or services.		N/A	N/A	N/A	N/A	X		N/A	N/A
Q14. OHR has observed improvement in LA implementation in FY18.		X	X	X	X	X		X	X
<b>QUALITY SCORE</b>	<b>2</b>	<b>3</b>	<b>3</b>	<b>3</b>	<b>3</b>	<b>4</b>	<b>2</b>	<b>2</b>	<b>3</b>
<b>TOTAL AGENCY SCORE</b>	<b>4</b>	<b>11</b>	<b>12</b>	<b>12</b>	<b>8</b>	<b>12</b>	<b>8</b>	<b>11</b>	<b>12</b>
<b>TOTAL POSSIBLE SCORE</b>	<b>14</b>	<b>12</b>	<b>12</b>	<b>12</b>	<b>12</b>	<b>14</b>	<b>14</b>	<b>12</b>	<b>12</b>

AGENCY NAME	MPD	OAH	OAG	OCP	OP	OTR	OPC	OSSE	OTA	OUC
<b>PREPAREDNESS</b>										
P1. Agency provided comprehensive data on FY18 encounters.	X	X	X		X	X	X	X		
P2. Agency has a current language access policy.	X	X	X		X		X	X	X	
P3. Agency staff were trained in FY18.		X	X		X	X	X	X	X	
P4. Agency communicated effectively.	X	X	X		X		X	X	X	X
P5. Agency took steps to ensure grantee/contractor compliance.	X	X	X	X	X	X	X	X	X	X
<b>PREPAREDNESS SCORE</b>	<b>4</b>	<b>5</b>	<b>5</b>	<b>1</b>	<b>5</b>	<b>3</b>	<b>5</b>	<b>5</b>	<b>4</b>	<b>2</b>
<b>ACCESSIBILITY</b>										
A6. Agency displayed adequate signage in public facing locations.	X	X	X	X	X	X	X		X	X
A7. Vital documents were translated and/or updated in FY18.	X	X	X		X		X	X	X	X
A8. Translated vital documents are accessible on agency website.	X	X			X		X	X		X
A9. Efforts were made to engage diverse LEP/NEP communities in FY18.	X	X	X			X	X	X	X	X
<b>ACCESSIBILITY SCORE</b>	<b>4</b>	<b>4</b>	<b>3</b>	<b>1</b>	<b>3</b>	<b>2</b>	<b>4</b>	<b>3</b>	<b>3</b>	<b>4</b>
<b>QUALITY</b>										
Q10. No language access public complaints were filed against the agency in FY18.		X	X	X	X	X	X	X	X	X
Q11. OHR has not issued a finding of non-compliance against the agency in FY18.		X	X	X	X	X	X	X	X	X
Q12. No tester was turned away during tests.	X	N/A	N/A	N/A	N/A	N/A	N/A		X	N/A
Q13. All testers who accessed employee or interpretation received requested information or services.	X	N/A	N/A	N/A	N/A	N/A	N/A		X	N/A
Q14. OHR has observed improvement in LA implementation in FY18.	X	X	X				X	X	X	
<b>QUALITY SCORE</b>	<b>3</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>3</b>	<b>3</b>	<b>5</b>	<b>2</b>
<b>TOTAL AGENCY SCORE</b>	<b>11</b>	<b>12</b>	<b>11</b>	<b>4</b>	<b>10</b>	<b>7</b>	<b>12</b>	<b>11</b>	<b>12</b>	<b>8</b>
<b>TOTAL POSSIBLE SCORE</b>	<b>14</b>	<b>12</b>	<b>12</b>	<b>12</b>	<b>12</b>	<b>12</b>	<b>12</b>	<b>14</b>	<b>14</b>	<b>12</b>

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*Cover Art: DC Mural by Aniekan Udofa titled "Building Together"*