

## LANGUAGE ACCESS PLAN FOR INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY

**State Agency:** NYS Council on Children and Families

**Effective Date of Plan:** April 7, 2025

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This document is our agency's **Language Access Plan**.

A **Language Access Plan** explains how we provide services to people who have limited English proficiency.

This **Language Access Plan** includes information about:

	The population with Limited English Proficiency ("LEP") in our service area.
	How we notify the public about language access services.
	Our resources and methods for providing language access services.
	How we train our staff to provide language access services to the public.
	How we monitor language access services and respond to complaints.



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## PART 1 – Our Agency’s Services



We prepared this Language Access Plan (“Plan”) to comply with New York State Executive Law Section 202-a, which establishes New York’s Statewide Language Access Policy. This Plan explains how we make sure that people with Limited English Proficiency (“LEP”) have meaningful access to agency services, programs and activities.

In this Plan, individuals with LEP are understood as people who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English.

### Our agency’s services to the public include:

CCF serves a unique role in state government. CCF coordinates the state’s education, health, and human services agencies to strengthen New York’s systems of care through cross-agency collaborations, so that every child and young person realizes their optimal potential. CCF embodies the spirit of collaboration, promoting creative cross-system approaches to improve the effectiveness and efficiency of interagency service delivery and consider new and emerging approaches to advance aligned policies and practices to improve the well-being of New York’s children and families, especially its most vulnerable. On a systems-level, CCF helps promote interagency solutions by convening the child-serving agencies – and collecting and analyzing data - to inform policies and practices. On the child-level, CCF co-chairs the NYS Early Childhood Advisory Council, houses the NYS Head Start Collaboration Office, the Early Childhood Comprehensive Systems project and the multi-million dollar Preschool Development Birth through Five project. CCF’s Interagency Resolution Unit helps support individual children with multi-system needs and their families by: identifying and accessing the most appropriate community-based or residential minimizing delays in arranging services or placement; and resolving interagency disputes that impede service delivery or placement. Navigating the state’s vast and multiple systems is challenging. To facilitate caregivers more easily accessing resources, CCF recently launched the **Help Hub for Families**. The Help Hub online resource intentionally doesn’t recreate existing resources or content but rather facilitates access to the state’s existing numerous and varied resources, supports, and services, and maps many of these resources to make them easier to locate. CCF also provides numerous other resources to assist families and other caregivers find and access services. In addition, CCF leads the Latina

Mentoring Initiative to connect young Latinas with Latina leaders. CCF also partners with schools, foster care agencies, and non-profit organizations to provide mentoring support to elementary school students and recruiting members of the public to become a mentor.



## **PART 2 – The Population with Limited English Proficiency in Our Service Area**

The Statewide Language Access Policy requires state agencies to translate vital agency documents into the top 12 most commonly spoken non-English language among New Yorkers with limited English proficiency. Our agency uses U.S. Census data (including data from the American Community Survey) to determine the top 12 languages most commonly spoken by individuals with LEP in New York State.

The top 12 languages spoken by individuals with LEP in New York State are:

#	Language	Estimated Number of Speakers with LEP (ACS 2018-2022)
1	Spanish	1,198,032
2	Chinese	377,524
3	Russian	124,422
4	Yiddish	90,199
5	Bangla	74,342
6	Haitian Creole	51,947
7	Korean	48,581
8	Arabic	42,907
9	Italian	41,155
10	French	34,304
11	Polish	33,122
12	Urdu	29,983

New York’s language access law also provides agencies, in consultation with the Office of Language Access, the option to add up to four more languages of translation beyond the top 12. The assessment about whether to include additional languages must be based on factors that are identified in the language access law. Our agency, in consultation with the Office of Language Access, has made the following determination with regard to the addition of languages beyond the top 12:

At this time, CCF has not identified additional languages. CCF will continue to work in partnership with community-based organizations and the Department of State’s Office for New



Americans and Office of Language Access to identify additional commonly spoken languages with emergent needs in New York State. When possible, CCF will ensure resources are translated into additional languages.

**Our agency tracks encounters of individuals with LEP in the following ways:**

CCF tracks the number of requests for CCF materials that have been translated into languages other than English. Given the small size of our agency, the CCF Language Access Coordinator is notified of all individual LEP encounters as well.



**PART 3 – Public Outreach About the Availability of Language Access Services**

**Our agency informs individuals with LEP about their right to free language assistance services in the following ways, using at least the top 12 languages shown in Part 2 of this Plan:**

- ☐ Individuals with LEP are directly informed by our staff

**In which ways?**

- ☐ Signs posted about language assistance services
  - ☐ In areas operated by the agency and open to the public
  - ☒ Other (describe)

CCF does not receive in-person constituents. We do operate several websites and ensure language access for those. We do receive phone calls from constituents and when needed, use interpreter services.

- ☒ Information is published on our agency's website in at least the top 12 languages spoken by individuals with LEP in New York State with the capacity to translate the site into over 100 languages.

- ☒ Outreach and presentations at schools, faith-based groups, and other community organizations
 

**What are the populations with LEP targeted?** We have no LEP target, however, if requested, we will provide interpretation of requested language (s).

- ☒ Local, non-English language media directed at individuals with LEP in their languages
 

**What are the populations with LEP targeted?** Our CCF family of websites are available in over 100 languages. Our CCF family resources folder is available in 16 languages both print and electronic. The targeted languages were based upon feedback



from partners at the United States Committee for Immigrants and Refugees and partners from the NYS Department of State, Office for New Americans. For our recent Help Hub media campaign, we had the funds to translate media into 20 languages. Typically our ability to translate varies by media buys and budget. We are able to track views of our website in different languages.

- ☒ Social media posts directed at individuals with LEP in their languages

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- ☐ Telephonic voice menu providing information in non-English languages

**In which languages?**

- ☐ Other (describe)



## **PART 4 – Provision of Language Access Services**

### **A. Determining the Need for Services**

**During *in person* encounters, our agency uses the following tools to determine whether an individual has LEP, and what their primary language is: CCF does not receive constituents in person.**

- ☐ “I Speak” posters or visual aids that provide information about free interpreting services in multiple languages
- ☐ Reception staff make those determinations based on training and experience
- ☐ Bilingual staff members, where available, assist in identifying the language of individuals with LEP
- ☒ Other (describe) Our agency does not provide direct in person services, so we connect with individuals with LEP through phone, events or outreach efforts and work in partnership with community-based organizations or our grantees to assist in determining language access needs



for in-person presentations or encounters. We schedule interpreters as needed for meetings, Workgroups, and agency events both virtual and in-person.

**On *telephone calls*, our agency uses the following tools to find out if an individual has LEP, and what their primary language is:**

- ☐ Reception staff make those determinations based on training and experience
- ☐ Bilingual staff members, where available, assist in identifying the language of individuals with LEP
- ☒ Telephonic interpreting service
- ☐ Other (describe) CCF team members who answer the phone are equipped with instructions how to use interpreter services.

**Our agency's protocols for assessing whether an individual needs *oral interpreting* services in different service situations is as follows:**

- ☐ **During office in-person encounters:**
- ☒ **At initial contact in the field:** At tabling or outreach events, CCF displays language identification visual aids.
- ☒ **When speaking on the telephone:** Ask: Do you need an Interpreter?
- ☐ **For pre-planned appointments of individuals with LEP:** NA.
- ☐ **Other (describe):**

**Our agency records and maintains documentation of language assistance needs of individuals with LEP as follows:**

CCF's language translation and interpretation contractors provide reports that enable CCF to monitor ongoing and emerging language translation needs. The LAC also tracks all translation and interpretation requests.

#### **B. Oral Interpreting Services**

**Our agency has made the following resources available for oral interpreting requests:**

- ☒ Bilingual staff members who work directly with individuals with LEP  
**Number of staff and languages spoken:** We have staff who speak Mandarin, Spanish, Farsi, and Vietnamese



☒ Bilingual staff members who provide oral interpreting services on a volunteer basis

**Number of staff and languages spoken:** We have staff who speak Mandarin, Spanish, Farsi, and Vietnamese

☒ Telephonic interpreting service

**Number of contractors and languages spoken:** 240+ languages through 33 Contractors, staff provided instructions for accessing vendors,

☐ Contracts or other arrangements with school and community organizations

**Number of contracts or other arrangements and languages spoken:**

☐ Other (Describe)

**Our agency protocols for informing individuals with LEP that free interpreting services will be provided and that they do not need to provide their own interpreters is as follows:**

☐ During office in-person encounters:

☐ At initial contact in the field:

☒ **When speaking on the telephone:** Do you need an Interpreter? If so, the staff person accesses a vendor, identifies an interpreter, shares with the individual with LEP that services for interpretation will be provided at no cost.

☐ For pre-planned appointments of individuals with LEP:

☐ Other (describe):

**Our agency's protocols for obtaining interpreting services in a timely manner is as follows:**

Our agency does not provide direct in person services, so we primarily connect with individuals with LEP through outreach efforts and work in partnership with community-based organizations to assist in determining language access needs for events, presentations, or encounters. The CCF Language Access Coordinator supports staff who may need interpreters as needed for agency events.

**If an individual with LEP insists on having a family member, friend, or other person interpret, our protocols for deciding whether to accept or decline such an arrangement is as follows:**

Individuals with LEP that come into contact with our agency will be informed of the availability of free interpreting services. Generally, individuals with LEP may not have a family member,





friend, or a minor interpret. However, during emergencies an individual with LEP may be permitted to have a minor, a family member or friend interpret.

Upon request, an individual with LEP individual may also be permitted to have use a minor, a family member or friend interpret for routine matters, such as asking the location of the office, hours of operation or rescheduling an appointment. Where the interaction with the individual with LEP occurs at the agency's office, and an individual is permitted to have an interpreter of their choosing, they must fill out a written consent/waiver form.

Where an individual with LEP is engaged in official business with the agency, the agency will provide an independent interpreter at all times.

**Our agency provides information to all staff members who have contact with the public about how to obtain oral interpreting services. Our protocol in this regard is as follows:**

Annually during the CCF staff meeting, the LAC provides a listing of all interpretation and translation contractors as well as desk aides and cards to support access to interpretation services.

**The agency's Language Access Coordinator ("LAC") maintains a list of oral interpreting resources that are available to staff. This resource list includes:**

- ☒ Names and contact information for all resources
- ☐ Names and locations of staff members who are available to act as interpreters or provide services directly in the primary language of an individual with LEP
- ☐ Languages in which each interpreter or service is qualified
- ☒ Procedures for accessing each interpreter or service

**Our agency records and maintains documentation of oral interpreting services provided to individuals with LEP at each encounter. Our protocol in this regard is as follows:**

Annually, the CCF Language Access Coordinator works with the CCF staff to identify the oral interpreting services provided during the previous year.

### **Cultural Competence and Confidentiality**

**Our agency makes sure interpreters are culturally competent<sup>1</sup> in the following ways:**

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<sup>1</sup> Cultural Competence is defined as *a set of congruent behaviors, attitudes, and policies that come together in a system or agency or among professionals that enables effective interactions in a cross-cultural framework*. U.S. Department of Health and Human Services, Office of Minority Health. 2000. Assuring Cultural Competence in Health Care: Recommendations for National Standards and an Outcomes-Focused Research Agenda. Extracted from:  
[https://minorityhealth.hhs.gov/Assets/pdf/checked/Assuring\\_Cultural\\_Competence\\_in\\_Health\\_Care-1999.pdf](https://minorityhealth.hhs.gov/Assets/pdf/checked/Assuring_Cultural_Competence_in_Health_Care-1999.pdf)



CCF staff participate in ongoing cultural competence training. Over the-phone interpretation contractors are approved by OGS and are required to complete comprehensive cultural competence training.

**Our agency makes sure interpreters follow state and federal confidentiality protocols in the following ways:**

The mandatory Language Access Training that CCF are required to take annually addresses the importance of confidentiality. Additionally, OGS-approved contractors for over-the-phone interpretation are trained and required to comply with federal and state standards of confidentiality.

**C. Translations of Documents**

**At least every two years after the effective date of this Plan, our agency determines and reassesses vital documents<sup>2</sup> that must be translated. This process is accomplished in the following ways:**

The LAP will be added as a biannual agenda item to be addressed at CCF's standing Operations Team meetings. An Operations Team member will be identified to work with the Language Access Coordinator to reassess vital documents to submit for translation.

**Our agency's process for making sure documents are written in plain language<sup>3</sup> before they are translated into other languages is as follows:**

CCF will make every effort to ensure documents are written in plain language. The CCF team will use tools, such as Microsoft Word Flesch scales, Plainlanguage.gov, and AI programs for support.

**Our agency has the following resources available for translation of documents:**

☒ Contractors translation services

**Number of contractors:** 33 potential contractors through OGS centralized contracts, desk aides and other printouts to support access.

☐ Contracts or other arrangements with schools and community organizations

**Names of schools/organizations:**

☐ Translation of documents by bilingual staff members

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<sup>2</sup> Vital Documents is defined as any paper or digital document that contains information that is critical for obtaining agency services or benefits or is otherwise required to be completed by law.

<sup>3</sup> The [Plain Writing Act of 2010](https://www.govinfo.gov/app/details/PLAW-111publ274) defines plain language as writing that is clear, concise, well-organized, and follows other best practices appropriate to the subject or field and intended audience. Extracted from: <https://www.govinfo.gov/app/details/PLAW-111publ274>



☐ Other (describe)

**The agency's Language Access Coordinator ("LAC") maintains a list of translation resources that are available to staff. This resource list includes:**

- ☒ Names and contact information for all resources
- ☐ Names and locations of staff members who are available to provide translations of documents
- ☐ Languages in which each translation service is qualified
- ☒ Procedures for accessing each translation service

**Our agency translates documents that individuals with LEP submit in their primary languages in a timely manner. Our protocol in this regard is as follows:**

Translation requests will be submitted to the attention of the CCF Language Access Coordinator, who works as expeditiously as possible to translate such documents. Generally, due to the nature of CCF work that doesn't involve direct contact with the public, CCF has not received any requests to translate documents.

**The following non-exhaustive list of documents are currently translated or in the process of translation by our agency in the languages indicated. Documents with an asterisk (\*) are determined by the agency to be vital documents.**

- *AR: Arabic*
- *BA: Bangla*
- *CH: Chinese*
- *FR: French*
- *HA: Haitian-Creole*
- *IT: Italian*
- *KO: Korean*
- *PO: Polish*
- *RU: Russian*
- *SP: Spanish*
- *UR: Urdu*
- *YI: Yiddish*

Form #	Name	Top 12 Languages												Additional Languages
		A R	B A	C H	F R	H A	I T	K O	P O	R U	S P	U R	Y I	
	NYS Mentoring Brochure	X	X	X		X	X	X	X	X	X		X	
	Mentoring Application*													
	IRU Consent*		X	X		X	X	X		X	X		X	
	IRU Intake			X						X	X			
	Family Guide to NYS EC Services	X	X	X	X	X	X	X	X	X	X	X	X	+Dari, Pashto, Ukrainian, Wolof

Let's Talk About NYS Animals											X			
Early Learning Guidelines + QR Card											X			
DAP Briefs (8) + QR Card											X			
PreK Learning Standards + QR Card											X			
Kindergarten Learning Standards + QR Card											X			
Planning for High Quality PreK											X			
Guide to Special Education Support +QR Card											X			
Starting Life Together											X			
Amazing Me!											X			
Where is Bear											X			
Baby Busy Day											X			
Help Hub QR Cards											X			
Help Hub Media	X	X	X	X	X	X	X	X	X	X	X	X	X	+Ukrainian, Pashto, Dari, Wolof, Cantonese, Mandarin

**The process for ensuring that translations are accurate and incorporate commonly used words is as follows:**

1. Translation projects will occur in two phases. Phase I: submitting a purchase request for translation. Once the translation is completed by the chosen contractor, enter phase II. Phase II: submitting a purchase request for quality assurance review of translated documents to ensure the incorporation of commonly used words.



## **PART 5 – Staff Training**

**The person in the agency who is responsible for training staff in language access services is:**  
Kristin Weller, Language Access Coordinator. Elana Marton, Language Access Alternate, Agency General Counsel.

**The staff training includes the following components:**

- ☒ The agency's legal obligations to provide language access services
- ☒ The agency's resources for providing language access services
- ☒ How to access and work with interpreters
- ☒ Cultural competence and cultural sensitivity
- ☒ How to obtain translation services
- ☒ Maintaining records of language access services provided to individuals with LEP

**The methods and frequency of training are as follows:**

The CCF team completes Language Access Training annually as part of mandated training requirements through the Statewide Learning Management System (SLMS). Supplemental trainings are available to staff one time per year and upon request.



## **PART 6 – Monitoring the Plan and Responding to Complaints**

### **A. Monitoring**

**Our agency’s Language Access Coordinator (“LAC”) will monitor implementation of the Plan to make sure we are in compliance. Our protocols in this regard are as follows:**

The LAC will conduct an annual review of the LAP to ensure compliance and report findings and recommendations to the CCF Operations Team.

### **B. Complaints**

**We provide information to the public in at least the top 12 most commonly spoken non-English languages in the state, advising members of the public of their right to file a complaint if they feel that they have not been provided adequate language access services or have been denied access to services because of their limited English proficiency. We do not retaliate or take other adverse action because an individual has filed a language access complaint.**

**We display information on the right to file a complaint, and the procedures for filing a complaint, in the following manner:**

Information on the right to file a complaint and the procedures to file a complaint are available on the CCF’s website in the top 12 languages. The CCF Language Access Policy also describes the complaint process and is available and reviewed by all employees. The Language Access Coordinator coordinates annual trainings on the complaint process to ensure all staff understand the protocol. The standardized complaint forms are available in all twelve languages in our public offices upon request. The complaint forms are also available for download or online submission through our website.

**We handle complaints made to the agency regarding the provision of language assistance services in the following manner:**

The CCF posts the complaint form and the procedure for submitting a complaint form in the top 12 languages publicly and online. The completed form is submitted to the CCF’s Language Access Coordinator for review and preliminary follow up. The LAC forwards the complaint and any recommendations to the CCF Executive Director for final review and response. The Executive Director will issue a written response to the individual submitting the complaint in a timely manner. All complaints must be forwarded to the Office of Language Access.



**PART 7 – Signatures**

*an*

X Vanessa Threatte

Vanessa Threatte, Executive Director, NYS CCF

4/7/25

Date

X Kristin Weller

Kristin Weller, Agency LAC, Special Projects & Communications

4/7/25

Date

X Margarita Larios

Margarita Larios  
Executive Director, NYS Office of Language Access

4/9/2025

Date