



The City of New York
BUSINESS INTEGRITY COMMISSION
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BUSINESS INTEGRITY COMMISSION

LANGUAGE ACCESS IMPLEMENTATION PLAN

I. Agency Mission and Background

Mission

The Business Integrity Commission (BIC) is both a law enforcement and regulatory agency charged with oversight of the private carting industry, the businesses operating in the City's public wholesale markets, and the currently inactive shipboard gambling industry. BIC issues licenses and registrations to applicants who meet the standards of integrity, honesty and good character pursuant to vigorous background investigations. Through regulation of these businesses and conducting criminal investigations, BIC carries out its mandate to eliminate organized crime and other forms of corruption and criminality from the industries it regulates.

Direct Services

BIC accepts and makes determinations on applications for trade waste and market licenses and registrations from the businesses it regulates as well as applications for photo identification cards for employees working for businesses in the public wholesale markets.

II. Agency Language Access Goals

Language Access Initiatives Already Underway

BIC has established a Language Access Bank where 15 employees, representing 7 different languages, have volunteered to translate when needed. The 7 languages represented are: Arabic, Akan, Chinese – Mandarin and Cantonese, Filipino, Spanish, and Urdu.

In addition, BIC has put up the “Free Interpretation Service Available” poster in the Reception Area, which is the agency walk-in area, and in the Licensing Unit to inform applicants that language translation is available.

BIC’s Language Access Plan Goals

BIC’s goal is to provide meaningful access and assistance to all applicants, licensees, and registrants including LEP individuals. BIC endeavors to ensure quality interpretation services and translation of materials through the use of bilingual staff employees and contract vendors. The Language Access Coordinator will be responsible for monitoring the effectiveness of the plan by evaluating on a monthly basis all request for language assistance. Staff is now documenting all LEP individuals requesting assistance; this information is inputted to a database which will enable the agency to generate reports on types of language, frequency and documents needing interpretation or translation. The Language Access Coordinator will submit updated reports to the Deputy Commissioner for further review and recommendations. All information provided by BIC, either documents or website matter, will be scheduled for update/translation at least once a year. In addition, BIC will continue to provide multilingual information to the public through our informational brochure and inquiry response staff.

III. LEP Population Assessment

BIC currently regulates over 2,000 actively operating licensees and registrants. Anecdotally, BIC on rare occasions receives requests for Cantonese, Mandarin and Spanish translation assistance. Data from 311 Language Line Calls indicates that the top languages for BIC are Spanish, Cantonese, and Mandarin.

Federal Department of Justice “Four-Factor Analysis”

Through the agency’s one walk-in center and the complaint lines, BIC has conducted an assessment of the LEP population employing the federal Four-Factor Analysis. BIC has identified the LEP population most frequenting our walk-in center. These languages have been identified as Mandarin, Cantonese and Spanish. We will determine how often translation services are needed. BIC has identified LEP’s requiring assistance in cases regarding trade waste applications specifically class 1 (landscapers) and class 2 (Construction and Demolition). Services and/or programs with high priority will be the focus in BIC’s Language Access Plan. BIC has identified a bank of volunteer employees who will be available for LEP assistance. In addition, BIC will explore what other resources are available to BIC for language access.

IV. Implementation Plan Logistics

A. Timetable

BIC’s implementation timetable is as follows, taking into consideration budgetary constraints:

Phase I: LEP Population Update

- | | <u>Completion Date</u> |
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| • Update the languages of the LEP population to see if there are additional languages that need assistance | September 2009 |
| • Update and review of how often BIC customers need assistance in other languages since BIC's LEP population is relatively small and assessment was anecdotal | September 2009 |
| • Finalize resources available for language access | September 2009 |

Phase II: Staff Training

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| • Train staff on how to handle LEP population needs and the City's Language Access Plan | May 2009 |
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Phase III: Translation of Languages Most Need for Translation

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| • Translate the Application Instructions into languages requiring the most translation needs | December 2009 |
| • Post the translated Application Instruction Sheets on the website and have the translated documents available for in-person distribution when needed | December 2009 |
| • Translate BIC's informational brochure, "Frequently Asked Questions" | December 2009 |
| • Print and distribute the brochure and post on Website | December 2009 |
| • Conduct an assessment of any further translation needs into other languages regarding the brochure | December 2009 |
| • Have Language Line contract in place, if BIC determines that in-house service does not meet all of language interpretation needs | December 2009 |
| • Implement community outreach by posting survey on website to get community feedback on BIC's language interpretation and translation services | December 2009 |

B. Milestones

- Translation of the Application Instruction Sheets
- Translation of BIC's informational brochure, "Frequently Asked Questions"
- Posting of the translated Application Instructions Sheets and informational Brochure on the website
- Train staff on BIC's Language Access Plan
- Language Line, if needed
- Community Outreach through survey on website

C. Key BIC Staff Involved In Implementation of the Language Access Plan

- The Language Access Coordinator will update the LEP population and identify the language needs of LEP persons who contact the agency through the walk-in center and telephone inquires through the Licensing Unit and agency's main telephone line. The Language Access Coordinator will also update and identify the languages in and the Application Instruction Sheets which need to be translated.
- Complaint Liaison will assist in updating the LEP population and identify the language needs of LEP persons who contact the agency the agency's complaint lines.
- The Language Access Coordinator will oversee the translation of the Application Instruction Sheets, the agency informational brochure, work with agency personnel to gather data on the LEP population and language needs, and ensure that BIC personnel are trained regarding the agency's Language Access Plan. The Language Access Coordinator will also look into the least inexpensive interpretation service, whether through DoITT's citywide contract for Language Line or other vendors, to supplement the agency's bilingual staff, and for written translation needs. The Language Coordinator will periodically conduct re-assessments of the LEP population and language needs.
- The Director of MIS will be responsible for posting the translated materials in the website; he will also be responsible for looking into the cost for translating BIC's website and overseeing its implementation.

V. Service Provision Plan

a. Interpretation Services

- Most of BIC's customer service population contacts the agency through the Licensing Unit's walk-in center and over the telephones. Interpretation needs are currently handled by BIC's bilingual staff. At present, BIC's interpretation needs are for Chinese (both in Mandarin and Cantonese) and Spanish. There have not been any other language needs identified. BIC will arrange to access the Language Line to supplement translation needs for languages other than Chinese and Spanish to be ready to provide assistance if so needed. At the same time, BIC will continue to monitor and document language interpretation needs so BIC can identify the primary languages of our customers. On average BIC receives request for LEP assistance 4-6 times per month. This includes all three languages identified.

b. Translation of Written Materials

The essential documents for our regulated businesses are the instruction sheets and application forms for private carter and market licenses and regulations. As part of BIC's implementation plan, we will have the Instruction Sheets to the various applications translated. Translations for Class 1 (Landscapers) and Class 2 (Construction and Demolition Debris) will be BIC's priority since these are the categories most requested by LEP's. Application instruction sheets for all other trade waste and wholesale market applications will be secondary on the priority list of documents to be translated. We will explore the Language Line or contract with a vendor to translate the essential documents.

The Language Access Coordinator will periodically review all application submitted and identified as an LEP is assisted. This will ensure that quality translations and interpretations have been successful. Employees listed in our language bank will also be utilized to review translated documents for efficiency. BIC will be able to determine by the answers provided on the application forms whether the information has been properly translated or interpreted or both. The answers on the applications are specific.

BIC is committed to plain language usage and we will work with the Mayor's Office of Adult Education to ensure that our documents that are distributed to the public meet the plain language standards.

BIC is currently exploring translating our website; however, budgetary constraints will be a factor in moving this forward.

c. Signage at Public Centers

Posters informing members of the public of the availability of free language assistance are posted in BIC's reception area and in the Licensing Unit's processing office. Also, small language

cards are displayed at the sign-in counter in the reception area. Since no person is allowed to pass the Reception Area without escort or assistance, no directional signage is necessary.

VI. Outreach and Public Awareness of BIC's Language Assistance Services

BIC will conduct community outreach on BIC's language assistance services by providing a survey on the website and to individuals through BIC's walk-in center for the public to evaluate the effectiveness of BIC's language assistance to the LEP population.

VI. Training

BIC will have training once a year about the LEP policies and procedures and on the agency's Language Access Implementation Plan where the Plan will be distributed to the employees. Employees will also be referenced to the agency's Language Bank and given copies of Executive Order 120. Employees assigned to license center walk-in area and complaint line personnel will be the key employees receiving training. All employees scheduled for training will be trained in identifying a customer's primary language, how to report request for language services, how to document LEP assistance and, if needed, the use of telephonic interpreters.

BIC's on-site employees who have volunteered their bilingual skills will be trained on how to ask questions to identify issues needing answers or clarification, how to provide the correct information, and on interpersonal skills when interacting with LEP individuals. A supervisor will be available to assist the bilingual employee during the translation process. As part of the training, supervisors will identify the normal questions that arise so that the BIC on-site translators give correct information.

VII. Record Keeping and Evaluation

a. Ensuring the Quality of Language Assistance Services

The Language Access Coordinator will provide feedback on the quality of the agency's language assistance services. The Language Access Coordinator can readily review whether or not LEP applicants fill out the applications properly, thus attesting to the quality of the translation assistance. Similarly, the Complaint Liaison working with the enforcement staff can identify whether or not a LEP complainant's issues were properly translated to document the nature of the complaint for its resolution. Further the database will be used to run reports on the number of LEP assistance was provided and the success of the interpretation service.

b. Maintaining records of language services provided

BIC will have a LEP request form for whenever translation/interpretation services are needed. The Language Coordinator will review the LEP request form on a monthly basis to monitor the language service needs and volume, and will report on emerging or change trends and needs. A

database will capture all requests and provide report for further review of language needs, satisfactory interpretation/translation and BIC services accessed. BIC will review these reports and update language access needs accordingly.

c. Compliance with Executive Order 120

BIC will ensure compliance with Executive Order 120 through the execution of the activities outlined in agency's Language Implementation Plan.

VIII. Resource Analysis and Planning

BIC has created a Language Bank, where it will be updated on a quarterly basis. On-site bilingual employees will provide translation needs when needed.

Given budgetary constraints, BIC will explore existing contracts for translation of written materials, the website, and languages that are other than the primary languages.

BIC will avail itself of any citywide resources as appropriate such as the poster notifying the public of the availability of interpretation services, the "I speak cards," and the Mayor's Office of Adult Education.