



---

## Language Access Implementation Plan

**Language Access Team:**

Department of Buildings

Mayor's Office of Operations

Michael R. Bloomberg  
Mayor

Commissioner  
Department of Buildings

## TABLE OF CONTENTS

<b>Introduction.....</b>	<b>1</b>
<b>Executive Order .....</b>	<b>1</b>
<b>Role of the Mayor's Office .....</b>	<b>3</b>
<b>Background of Language Access Program.....</b>	<b>3</b>
<b>I. Agency Mission.....</b>	<b>5</b>
<b>A. Mission of the Agency .....</b>	<b>5</b>
<b>B. Direct Services Offered.....</b>	<b>5</b>
<b>II. Agency's Language Access Goals.....</b>	<b>8</b>
<b>A. Goal of Agency's Language Access Plan.....</b>	<b>8</b>
<b>B. Gauging Success .....</b>	<b>10</b>
<b>III. Limited English Proficiency (LEP) Population Assessment .....</b>	<b>11</b>
<b>A. Execution of the Department of Justice's Four-Factor Analysis.....</b>	<b>11</b>
<b>B. Utilize existing data.....</b>	<b>11</b>
<b>C. Survey.....</b>	<b>14</b>
<b>IV. Implementation Plan Logistics.....</b>	<b>22</b>
<b>A. Timeline for Implementation .....</b>	<b>22</b>
<b>B. Major milestones.....</b>	<b>22</b>
<b>C. Who will be involved in implementing the language access plan .....</b>	<b>22</b>
<b>V. Service Provision Plan .....</b>	<b>26</b>
<b>A. Interpretation Services .....</b>	<b>26</b>
<b>B. Translation of Written Materials .....</b>	<b>30</b>
<b>C. Signage at Public Service Centers .....</b>	<b>36</b>
<b>VI. Training.....</b>	<b>40</b>

A. How We Will Provide Training on Our Language Access Plan.....	40
B. How We Will Provide Training on Identifying a Customer's Primary Language .....	41
C. How We Will Provide Cultural Competency Training.....	42
<b>VII. Record Keeping and Evaluation.....</b>	<b>42</b>
A. How We Will Ensure the Quality of Our Language Access Service.....	42
B. How We Will Maintain Records of the Language Services the Agency Provides .....	43
C. How We Will Ensure Compliance with the Executive Order.....	44
<b>VIII. Resource Analysis and Planning .....</b>	<b>46</b>
A. How We Will Leverage Current Agency Resources to Implement Plan .....	46
B. How We Will Leverage Current Agency Resources to Implement Plan.....	47

## **Introduction**

### **Executive Order**

On July 22nd, 2008, Mayor Bloomberg signed Executive Order 120, which outlined two primary responsibilities for NYC agencies:

1. Within 45 days, appoint a Language Access Coordinator
2. By January 1<sup>st</sup>, 2009, Create and distribute a Language Access Policy and Implementation Plan to:
  - Provide and ensure access to direct public services
  - Demonstrate flexibility in determining language access assistance for their agency, according to their individual customer base
  - Meet the language access standards defined by the Customer Service Group

### **Role and Responsibilities of the Language Access Coordinator**

The language access coordinator should be a current employee of the agency who:

- Acts as the agency's Customer Service Liaison or works closely with the Customer Service Liaison
- Familiar with customer-based divisions of the agency
- Has decision-making authority
- Dedicates time to creating a language access plan at his/her agency and monitor its implementation
- Works internally with agency stakeholders on creating a language access plan for the agency
- Collects data on current customer base
- Provides analysis of current programs
- Liaises with the Mayor's Office regarding the language access plan and implementation strategy

## **Specific Responsibilities**

- Provide support to borough and unit leadership on language access services
- Serve as a coordinator to language access liaisons and directors to ensure effective language access programs and policies to help reduce linguistic barriers to service
- Conduct need assessments to identify strengths and weaknesses
- Oversee citywide contracts related to language access services (interpreting, translation, and cultural competency) to ensure quality assurance and cost benefits
- Develop reporting tools and/or systems to capture data
- Set guidelines for the consistent collection of interpreter services for reporting
- Develop and distribute materials to inform staff and customers of language access programs
- Encourage the use of vendor translation services rather than ad-hoc methods
- Maintain the agency's policy and procedures and keeping them current and relevant
- Convene, support, and maintain up-to-date contact information for the staff assisting with the language access program
- Ensure that the "Notice of Free Interpretation Services" poster is visible and the "I Speak" cards are accessible
- Provide oversight and monitoring to the provisions of oral and written language services to customers and,
- Assess staff training and conduct or coordinate training to ensure that staff is prepared to provide meaningful language access to LEP customers

## **Role of the Mayor's Office**

The Mayor's Office will be available to support agencies as they create their own language access policies and plans:

- Work with coordinators in creating policies and plans
  - Share examples of functioning language access plans
  - Distribute leading practices for language access planning
  - Provide technical support as questions arise
- Review language access plans for compliance with Executive Order 120
- Create citywide tools/solutions for providing language access

## **Background of Language Access Program**

New York City's unique customer base requires cultural competency and language access for its limited-English proficient (LEP) customers.

- NYC is home to approximately 3.4 million immigrants
- Almost half of New Yorkers speak a language other than English at home
- 1.8 million New Yorkers, or approximately  $\frac{1}{4}$  of NYC's population, identify themselves as limited English proficient

**The most common languages spoken and read by LEP individuals in New York City are:**

<b>1. Spanish</b>	<b>4. Korean</b>
<b>2. Chinese</b>	<b>5. Italian</b>
<b>3. Russian</b>	<b>6. Haitian Creole</b>

**There are two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:**

- Title VI of the 1964 Civil Rights Act
  - Prohibits federally funded agencies and programs from discriminating against individuals based on national origin
- Federal Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (2000)
  - Ensures meaningful access in the form of language access service provision to all LEP individuals who seek or receive federal benefits

**Although these mandates cover many City social programs, Mayor Bloomberg signed the first local law regarding language access in 2003:**

- Local Law 73 (2003), Equal Access to Human Services Law
  - Mandates the NYC Human Resources Administration, Department of Homeless Services, Administration for Children Services, and Department of Health and Mental Hygiene to provide free language interpretation services for individuals considered limited in English, ensuring meaningful access



## Language Access Implementation Plan

### I. Agency Mission

#### A. Mission of the Agency

The New York City Buildings Department (“The Department”) ensures the safe and lawful use of buildings and properties by enforcing the Building Code and the Zoning Resolution.

- We facilitate compliant development with integrity, efficiency and professionalism.
- We are steadfast to making construction in our city safer and to enhancing the quality of life for all New Yorkers.
- We are committed to improving our performance and developing procedures that are streamlined, understandable and transparent.

#### B. Direct Services Offered

The Department consists of operating offices in each borough with central and executive offices in Manhattan. It has jurisdiction over 975,000 buildings and properties citywide. Our architects, engineers, lawyers, administrative and support staff are critical to our success in enforcing safe construction practices and delivering services.

- Our architects and engineers evaluate construction plans, verifying they meet Building Code and zoning requirements.
- Our inspectors monitor job sites to enforce building code and zoning regulations, and issue violations when appropriate.
- Our Department issues a Certificate of Occupancy (C of O), which documents the legal use and/or occupancy of a building, is issued when the required sign-offs are obtained.
- Our managers and support staff are dedicated to meeting the needs of the public by providing great customer service and developing streamlined operations that are effective and ensure public safety.

We are committed to enhancing the quality of life for all New Yorkers and making our City a great place to live, work and build.



## Language Access Implementation Plan

The Department of Buildings issues over one hundred thousand building permits, permit renewals, Certificate of Occupancy and violations annually.

### Permits

- Alterations – Room additions, conversions and renovations
- Construction Equipment - Fences, sheds, chutes, scaffolds, etc.
- Curb Cuts
- Demolition & Removal
- Electrical Systems
- Elevators
- Fire Alarms
- Fire Suppression Systems
- Foundation/Earthwork
- Fuel Burning/Storage
- Mechanical and HVAC (Heating, Ventilating and Air Conditioning Systems)
- New Building Construction
- Places of Assembly (PA)
- Plumbing Systems
- Residential Work – Decks/porches, garages, fences, fireplaces, pools, water heaters, etc.
- Signs
- Sprinklers
- Standpipe Systems
- Subdivisions



## Language Access Implementation Plan

We also issue and renew different types of tradesperson's licenses and registrations:

### Licenses

- Master Plumbers
- Master Fire Suppression Piping Contractors (Class A, B and C)
- Welders (Classes 1-4)
- Engineers (Stationary and Portable)
- Hoisting Machine Operators (Class A and B)
- Hoisting Machine Operators (Class C)
- Master Sign Hangers
- Special Sign Hangers
- Master Riggers
- Special Riggers
- Elevator Inspectors
- Elevator Agency Directors
- Oil Burning Equipment Installers (Class A & B)
- Climber or Tower Crane Riggers
- Site Safety Coordinator
- Site Safety Managers
- Cement Testing Laboratories
- Master Electrician
- Special Electrician

### Registrations

- Construction Superintendents
- Filing Representatives
- General Contractor



## **Language Access Implementation Plan**

### **II. Agency's Language Access Goals**

#### **A. Goal of Agency's Language Access Plan**

Our goal is to provide meaningful access to services and materials by developing and implementing an agency-specific language assistance plan for our Limited-English Proficient (LEP) applicants, homeowners and other customers. The top six LEP languages determined by the Department of City Planning will be implemented to promote access to services through language assistance which is critical for workers to interact effectively with our customers.

**Create a language access committee to include:**

- Frontline employees
- Managers
- General Counsel
- Policy Analysts
- IT representatives (data collection issues)
- Language Access Coordinator



## Language Access Implementation Plan

### Enforce the language access plan through identifying:

- Types of LEP encounters and the language services required
- Type and scope of staff training and evaluation
- Processes for customer service representatives and inspectors to access interpreters and translated documents
- Recruitment opportunities of new customer service representatives with bilingual skills as a preferred qualification
- Data collection system
- Other needs (e.g. glossary of agency-specific terms)
- Potential partnerships with Community Boards for outreach
- Ethnic media outlets and the incorporation into larger outreach and public education plans
- Creation of a budget for language access services, and a line item in operating budgets
- Signage and multilingual way-finding
- Multilingual outreach promoting the availability of language access services

### Employ Multilingual Outreach Opportunities

- Agency communications and outreach departments to consider multilingual needs of the populations they serve by budgeting for ethnic media advertising and using bilingual employees or interpretation services for outreach and/or public education campaigns.



## **Language Access Implementation Plan**

### **B. Gauging Success**

#### **Create a quality assurance system**

- Implementation of a data collection system as outlined in the language access plan
- Oversight and quality assurance of the agencies language access services
- Assignment of a language access liaison for each borough office and central unit to monitor customer service and quality assurance issues for their office/department
- Monthly reports to Language Access Coordinator via liaison
- Creation of a periodic survey of LEP clients to determine the quality of the translations and interpretation services provided
- Once a document is translated by the vendor, bilingual staff will review the document to verify the accuracy of the document
- Periodic review process for vendor service
- Secret shopper at walk-in locations to determine if front-line staff are aware of language line services and how to identify primary language

#### **Create an evaluation system utilizing:**

- Site visits
- Aggregate data
- Reports on a monthly basis the number of LEP clients served in the MMR or CPR
- Reports created on a yearly basis (supervised by the language access coordinator) to include site visit survey results, activities to date and other indicators for a successful language access service provision



## **Language Access Implementation Plan**

### **III. Limited English Proficiency (LEP) Population Assessment**

The Department will utilize the top six citywide LEP languages in our implementation plan based on Census data and internal research. The Department shall provide services to LEP customers by various methods based upon the relative numbers of such persons and the frequency of contacts or anticipated contacts. Reasonable steps shall be taken to accomplish our goals, but at the point at which costs approach or exceed the benefits, alternative methods of delivery of language services will be evaluated and appropriate changes made.

#### **A. Execution of the Department of Justice's Four-Factor Analysis**

##### **Factor 1: The number or proportion of LEP persons in the eligible service population**

The Department determined the proportion of LEP persons identified based on data obtained from 311 and our internal survey to determine the number of customers served citywide by borough and central unit.

- There has been no significant population or demographic changes in our service area since the 2000 Census
- Our 2008 assessment is in line with the top six citywide languages

#### **B. Utilize existing data**

- Collect data obtained by the Mayor's Office of Immigrant Affairs
- U.S. Census data
- Work with 311 Liaison to obtain data specific to our agency
  - Volume of calls transferred to Language Line
  - Volume of complaint calls transferred to language Line
- Use available agency data on our customers



## Language Access Implementation Plan

### Total Volume of Calls to 311 Requiring Language Assistance Annually

Requested Language	Year 2006	Volume of Language Line Calls	Year 2007	Volume of Language Line Calls	Year 2008	Volume of Language Line Calls	Volume of Complaint Calls to Language Line
Arabic		7		1		4	0
Bengali		9		6		5	5
Cantonese		251		387		355	88
French		5		1		3	1
Greek		9		3		5	0
Haitian Creole		11				6	4
Hebrew		1					
Hindi		1		1			0
Italian		23		16		12	3
Japanese		4		5		3	1
Korean		46		43		87	25
Mandarin		325		455		598	183
Other		13		28		26	9
Polish		37		38		14	2
Russian		238		284		314	156
Spanish		580		418		341	191
Unspecified		1,057		1,079		867	351
	<b>Total</b>	<b>2,617</b>		<b>Total</b>	<b>2,765</b>	<b>Total</b>	<b>2,640</b>
							<b>1,019</b>

Note: As of October 7, 2008

Most common languages spoken and read by Limited-English Proficient (LEP) customers citywide.  
The “Unspecified” numbers are for calls where language assistance was requested but the 311 CCR did not note the language requested.

Please Note: Complaint volume captured in 2008 totals.



## Language Access Implementation Plan

### Complaint Calls to 311 Requiring Language Line Assistance

Billboard or Building Sign in Danger of Falling
Building Exit Blocked
Commercial Vehicle Parked in Residential Driveway
Dangerous Elevator or Escalator
Defective Sprinkler System - 1 or 2 Family Home or Commercial Building
Electrical Work Without Permit - In Progress
Illegal Conversions
Illegal Hotel Rooms in Residential Building
Plumbing Work Without Permit
Unsafe Building Excavation or Demolition
Unsafe Building Structure
Unsafe Gas Piping and Hookup
Vacate Orders
Vehicle Storage on Residential Property

**The information provided by 311 helped us to determine the units we will our customers will seek assistance from.**

**Factor 2: The frequency with which LEP individuals come into contact with the agency**

The Department conducted a survey of the borough offices and various central units to determine the number of LEP customers we encounter on a monthly basis.



## Language Access Implementation Plan

### Survey

Based on our internal survey the total volume of interactions with LEP customers is as follows:

<b>Limited-English Proficient Customers Assisted Monthly in 2008</b>			
<b>Borough Offices</b>	<b>Walk-In</b>	<b>By telephone</b>	<b>By mail</b>
Bronx	35	40	5
Brooklyn	50	50	0
Manhattan	10	5	0
Queens	50	30	5
Staten Island	0	0	0
<b>Central Units</b>	<b>Walk-In</b>	<b>By telephone</b>	<b>By mail</b>
Administration	0	3	0
Administrative Enforcement Unit	50	25	2
Alteration Repair Application/Permit Renewal Unit	5	0	0
BEST Squad/Stop Work Order Unit	0	15	0
BIS Team	48	130	0
Boiler	20	5	5
Borough Enforcement Unit	0	1	0
Customer Service	10	2	0
Cranes & Derricks	5	17	0
Elevators	10	5	0
Fiscal	30	36	54
Facades	1	1	1
General Counsel	1	1	0
IGA	20	10	15
Licensing	20	60	0
Padlock Enforcement	2	6	3
Special Enforcement Program/ Excavation Unit	100	150	0
Special Operations	1	3	0
Sustainability/Energy Code	0	0	0
<b>Total</b>	<b>468</b>	<b>595</b>	<b>90</b>

The Department will monitor the vendor's monthly billings pertaining to languages required, the nature of the transaction and duration of each transaction to collect important information required for reporting purposes.



## Language Access Implementation Plan

### **Factor 3: The importance of the benefit, service, information, or encounter to the LEP person and the associated language access**

The Department recognizes that within the range of services it provides some services are prioritized. While it is the Department's intent to provide meaningful access to all customers and eligible individuals, the availability of resources may limit the conditions of language services in some instances.

Activities such as outreach, issuance of violations, vacate orders and stop work orders, legal actions, life and safety notices are of highest priority. Information about and an understanding of these activities should be effectively communicated to all persons immediately affected.

#### **Required interpretation (in-person or telephonic) services**

- In-person office visits (telephonic interpretation)
- Telephone interactions (telephonic interpretation)
- Agency workers, e.g., inspectors visit properties, (telephonic interpretation)

Other activities and materials such as technical forms and optional meetings are of lesser importance and hence a lower priority.

- We discovered some encounters involved interpretation by children, other family members and others
- Issues of competency, confidentiality and conflict of interest in the use of family members, friends or other informal interpreters often make their use inappropriate.



## Language Access Implementation Plan

### Required translation services: Essential documents\*

- AEU-2: Certificate of Correction
- LS-4: No Access Notice
- Stop Work Order
- Vacate Order
- Violation

We intend to have the above referenced documents translated and available by September 2009.

We will continue to survey the types of encounters and volume of contact the LEP population will have when in contact with the agency to meet the needs of these individuals.

\*All translation services should be reviewed by a qualified reviewer (employee or volunteer)



## Language Access Implementation Plan

### Future Considerations

- Brochures
- Information/web sites
- Public education campaigns (posters, print materials)
- Media/advertising
  - Street or neighborhood contact and in-person community outreach, e.g. police, community events/workshops
  - Public hearings and meetings
  - School/education sites

The Department will offer oral interpretation at no charge at meetings and events, provided that the needs are identified by the participants at least two weeks in advance prior to the event. Written communication for advertising such events shall provide instructions for requesting interpretation services.

We intend to implement the translation of additional materials and expand our outreach in phases between July 2011 and 2012.



## Language Access Implementation Plan

Determine the immediate components of language access needed to ensure the effective implementation of language access services:

Types of Encounters With LEP Individuals	Language Assistance Services	Implementation Plan Requirements	Timeline
In-person office visit	In-person staff interpreter (vendor)	<ul style="list-style-type: none"><li>• Train customer service staff on how to use services</li><li>• Train frontline staff on how to use services</li><li>• Train staff on how to identify language of LEP customer</li><li>• Train monolingual workers on how to work with an interpreter</li><li>• Train interpreter on protocols and glossaries of agency-specific terms</li></ul>	March 2009 to June 2009
In-person office visit	Identification of language of LEP customer and promotion of language assistance services	<ul style="list-style-type: none"><li>• Include in customer service staff training</li><li>• Include in frontline staff training</li><li>• Offer language ID cards</li><li>• Signage offering free language assistance services</li><li>• Greeters in Customer Service areas</li><li>• Data collection</li><li>• Brief security staff on protocol</li></ul>	July 2009 to September 2009
Inspector visiting homes	Telephonic interpretation vendor	<ul style="list-style-type: none"><li>• Equip inspector with cell phone to call telephonic interpretation vendor or a notice in multiple languages requesting if the inspector can make a free call to the interpretation vendor</li><li>• Train inspector on how to access vendor</li></ul>	July 2009 to September 2009
Inspector visiting homes	Identification of language of LEP individual	<ul style="list-style-type: none"><li>• Equip inspector with language identification card</li></ul>	July 2009 to September 2009

Once the contract is in place with Language Line Services we will provide the necessary training and required materials to staff. We anticipate training to start in July 2009 and be completed by August 2009. Upon the completion of training all borough offices, units and inspectors will be equipped with the required materials outlined above.



## Language Access Implementation Plan

Types of Encounters With LEP Individuals	Language Assistance Services	Future Considerations	Timeline
Public hearings and meetings	Simultaneous in-person interpretation vendor	<ul style="list-style-type: none"><li>Promote the availability of interpretation services and include in all publicity efforts</li><li>Plan several weeks prior to meeting, survey the layout of the space</li></ul>	July 2010 to July 2012
School/education sites – offices	Bilingual employees	<ul style="list-style-type: none"><li>Evaluate the level of language proficiency</li></ul>	July 2010 to July 2012
School/education sites – classrooms	Bilingual instructors	<ul style="list-style-type: none"><li>Evaluate the level of language proficiency</li></ul>	July 2010 to July 2012
School/education sites – classrooms	DVD in a language other than English	<ul style="list-style-type: none"><li>Record orientations and short workshops in other languages and present for LEP individuals</li></ul>	July 2011 to July 2012
Essential documents - Application forms	Translation vendor	<ul style="list-style-type: none"><li>Review translations by qualified employees for accuracy</li><li>Create a language bank of employees who are tested to serve as reviewers</li></ul>	July 2010 to July 2012
Information/web sites	Translation vendor	<ul style="list-style-type: none"><li>Vendor translations should be reviewed by qualified employees for quality, good option is to create a language bank of employees who are tested to serve as reviewers</li></ul>	July 2010 to July 2012
Information/web sites	Agency translator	<ul style="list-style-type: none"><li>Utilize voluntary or staff positions for translators</li><li>Trained and tested staff volunteers</li><li>Review translations by qualified employees for accuracy</li><li>Create a language bank of employees who are tested to serve as reviewers</li></ul>	July 2010 to July 2012



## Language Access Implementation Plan

Types of Encounters With LEP Individuals	Language Assistance Services	Future Considerations	Timeline
Public education campaigns – print materials	Translation vendor	<ul style="list-style-type: none"><li>• Utilize voluntary or staff positions for translators</li><li>• Trained and tested volunteers</li><li>• Review translations by qualified employees for accuracy</li><li>• Create a language bank of employees who are tested to serve as reviewers</li></ul>	July 2010 to July 2012
Public education campaigns – print materials	Agency translator	<ul style="list-style-type: none"><li>• Utilize voluntary or staff positions for translators</li><li>• Trained and tested volunteers</li><li>• Review translations by qualified employees for accuracy</li><li>• Create a language bank of employees who are tested to serve as reviewers</li></ul>	July 2010 to July 2012
Public education campaigns – print, TV, radio	Create culturally competent materials	<ul style="list-style-type: none"><li>• Partner with Community Boards and community leaders for feedback on language and cultural competency of materials and campaign strategy</li><li>• Partner with Community Boards and community leaders for assistance during outreach events and opportunities for distributing materials</li><li>• Procure the services of a designer who has experience creating multicultural materials on an as needed basis</li><li>• Conduct focus groups with LEP individuals to determine the linguistic and cultural competency of the materials</li></ul>	July 2010 to July 2012

We will implement future considerations based on our annual assessments.



## **Language Access Implementation Plan**

### **Factor 4: The resources available to the agency and the costs of providing language services**

The Department will implement interpretation and translation services based on the analysis performed and data collected. We will utilize the citywide contract.

We will budget for and utilize the current vendor contracted by DOITT - Language Line Services, Inc. for telephone interpretation and document translation services.

We will schedule appointments during Homeowners' Nights to fully address and resolve the customer's issues. We will try to determine the customer's needs prior to the appointment to ensure a successful outcome.



## **Language Access Implementation Plan**

### **Utilizing the Top Six Citywide LEP Languages**

The data collected through the Department's research into the various language groups requiring services are in line with the citywide top six LEP languages identified. Based on the data collected, Buildings will utilize the top six citywide LEP languages in the Language Access Plan. There will not be any modification.

## **IV. Implementation Plan Logistics**

### **A. Timeline for Implementation**

We will implement our plan in phases:

- Telephone Interpretation Services
- Outreach Interpretation Services
- Document Translation

### **B. Major milestones**

- Developed plan
- Identified vendor
- Formation of the Language Access Team
- Develop roles and responsibilities
- Develop training plan
- Training

### **C. Who will be involved in implementing the language access plan**

The responsibility for implementing and carrying out Executive Order 120 to ensure meaningful access for limited-English proficient customers is shared by the Department as a whole.

The language access program will be overseen by the Director of Customer Service who will serve as the primary point of contact for implementing the plan as well as the point of contact for Mayoral level compliance reviews. The Director will serve as the agency's language access coordinator.



## **Language Access Implementation Plan**

### **Language Access Team**

The Director will appoint a language access team comprised of representatives from various boroughs and units. The following committees will be formed:

- Complaint Resolution
- Community Advisory Council
- Operations
- Quality Assurance

The team will be charged with:

- Developing and providing roles and responsibilities training for Language Access Liaisons (LAL)
- Providing initial training support and guidance to LAL and ensuring LAL receive training bi-annually
- Overseeing the translation and printing of essential documents into languages most often requested
- Receiving, reviewing and investigating appropriate complaints of discrimination based on discrimination as they relate to language assistance
- Managing the annual self-assessment survey and maintaining the information provided by the borough offices and various units
- Maintaining adequate language assistance resources and assisting borough offices and units with serving LEP customers
- Ensuring the completion of the annual self-assessment survey and report



## **Language Access Implementation Plan**

### **Complaint Resolution Committee (CRC)**

The CRC is an informal committee of the Language Access Team whose role is to assist in the investigation of allegations of discrimination based on LEP complaints. The CRC consists of the Director of Customer Service, IAD representative and two members of the Language Access Team. The team will work together to investigate and respond to complaints. Complaints will be responded to in ten (10) business days.

### **Community Advisory Committee (CAC) - Specific Responsibilities**

The committee is comprised of current intergovernmental staff members from each borough and overseen by the Director of Community Affairs to provide feedback about actual and perceived service delivery challenges from the customers' and community's perspectives.

The following committees will provide quarterly reports to the Director of Customer Service to help evaluate the success and compliance of the program.

### **Operations**

- Coordinate the provision of effective and timely interpretation services on a day-to-day basis within their borough or unit
- Increase the visibility of interpreter services and assist customers seeking interpreter services
- Collect, track, document and report to the Director of Customer Service on a monthly basis all interpreter services requested and provided in their facility and community meetings
- Manage document translations via approved translation agency
- Support services for LEP persons by educating staff on how to access language access services



## **Language Access Implementation Plan**

### **Quality Assurance**

- Review and monitor compliance
- Managing the annual agency-assessment survey
- Maintaining the information provided by the borough offices and various units to prepare MMR annual reports

### **Quality Assurance - Specific Responsibilities**

- Maintain records of language services provided
- Ensure compliance with Executive Order 120
- Compile quarterly report for Director of Customer Service
- Prepare annual report for the Mayor's Office of Operations



## Language Access Implementation Plan

### V. Service Provision Plan

The plan was developed to serve The Department's customers, prospective customers, or other interested members of the public (hereafter called "customers") who do not speak, read, write or understand English or do so on a limited basis. A customer is considered limited English proficient when they are unable to speak, read, write, or understand the English language at a level that allows them to interact effectively with The Department's staff. The plan will be implemented gradually. We are currently translating documents pertaining to public safety and plan to complete the initial rollout by 2012. The Director of Customer Service will evaluate program annually for ways to ensure we are meeting the needs of our customers.

#### *Affirmative Offer of Language Assistance*

The Department's staff will initiate an offer for language assistance to customers who have difficulty communicating in English. Additionally, when customers ask for language assistance, staff must offer free interpretation and/or translation services in a language they understand, in a way that preserves confidentiality, and in a timely manner.

#### *Competency Standards for Interpreters*

To provide effective services to LEP persons, The Department will use competent interpreters. "Competency" requires that interpreters will have demonstrated proficiency in both English and the intended language; training that includes the skills and ethics of interpreting (e.g. issues of confidentiality); fundamental knowledge in both languages of any specialized terms or concepts; and sensitivity to the client's culture.

#### *Quality Standards for Translated Documents*

The Department will obtain translation services only from vendors who have a master contract with the City through an extensive RFP process. Vendors will have internal proofing and editing processes. When available, The Department's bilingual staff will review translated documents for accuracy and appropriateness of terminology.

### A. Interpretation Services

#### (i) How We Will Provide Interpretation Services

Provide services based on at least the top six LEP languages spoken by the population of New York City as identified by the Department of City Planning, based on the United States Census Bureau data and other languages relevant to services provided by the agency.

The Department will provide (spoken) interpretation in any language and translation of (written) documents into the top six languages (Spanish, Chinese, Russian, Italian, Haitian Creole, Korean) by utilizing the DoITT citywide contract for Language Line and existing bilingual staff. The contract should be in place by July 1, 2009.



## **Language Access Implementation Plan**

### **Implementation Requirements**

- (ii) The Department will track language assistance requests to assess language assistance needs for each borough office and central units
- (iii) A telephone in each borough office and various units in each walk-in center will be designated for the use of interpretation services. Designated telephones will either have speaker capability or be equipped for the use of dual headsets.
- (iv) When the customer indicates he/she needs an interpreter, the Language Access Liaison or a member of their staff will immediately determine and document the customer's preferred language and authorize the use of the Language Line interpretation service.
- (v) The Department will never require a family member or friend to be used as an interpreter unless the applicant/customer requests such assistance from their family member or friend.
- (vi) In accordance with Executive Order 120 , applicants/customers in need of language services will not be expected to wait unreasonably longer to receive assistance than those individuals who do not require language assistance services

### **Language Assistance Services Task Status as of December 2008**

- (i) The Director of Customer Service is responsible for implementing a Department required data standardized collection method for each borough office and various central units. The new data collection spreadsheet will be known as Language Access Management Program (LAMP). The fundamental structure of the data collection methodology will be to capture basic identification and demographic information for all LEP customers. We will incorporate the LEP question process into the LAMP spreadsheet, which will therefore be present and operational when we implement the plan. The anticipated date to officially begin using the spreadsheet is July 2009.
- (ii) The Department is exploring the location for the Language Line designated telephones at each borough office and central unit (as described in section 5.1.1 B above) for the utilization of our telephone interpretation service.
- (iii) Specific information concerning such documentation requirements will and may vary based on the type of facility and staff role (for example, an inspector will document interpretative services needed/offered on the Special Report whereas a Language Access Liaison will document interpretative services/needed in the LAMP database).



## **Language Access Implementation Plan**

- (iv) At this time, The Department is exploring all options regarding the designation and utilization of staff as Language Access Liaisons. If required, it is expected that The Department will continue to work closely with the Mayor's Office of Operations and Mayor's Office of Immigrant Affairs for further guidance regarding the Language Access Liaison role.
- (v) The Agency has determined to have an onsite manager authorize utilization of the translation service.
- (vi) The issue of using family members and friends as interpreters will also be specifically reiterated in the New Hire orientation document.

### **Providing services by telephone**

#### **(i) Language Line's "Please Hold" Kit**

The kit consists of six phrases in 25 languages, designed to help identify a limited English speaker's language and inform them an interpreter is being called. The phrases are available in booklet form, as well as audio recordings on CD and cassette provided by Language Line.

##### **The phrases include:**

- Hello
- Do you speak (name of language)?
- Yes
- Please hold for an interpreter

#### **(ii) At Service Centers**

We will procure the following materials to assist in the implementation of our plan:

- Use language assistance card or "I Speak" cards which invite the LEP person to identify his/her language
- Use language information in database of past transactions with customer. If not in database, information will be recorded for future use

Post notices in commonly encountered languages notifying LEP persons of language assistance.



## **Language Access Implementation Plan**

**To determine our volume of customers requiring interpretation services, we will measure:**

- Language requested
- Calls per day (Over an 8-hour period) broken down by language
- Hours of interpretation requested per month by borough or central unit

### **Quick Reference Guides**

A convenient sized card that provides instructions on how to access Language Line and tips on how to effectively work with an interpreter will be provided to Language Access liaisons, supervisors and managers.

### **Language ID Card:**

Card is designed for face-to-face situations to facilitate language identification/selection and to inform limited English speakers that an interpreter will be called. The card includes 94 languages and will be available at our customer service windows.

### **Interpretation Services Available Poster**

These posters (11" x 17") or desktop displays (8 1/2" x 11") will be posted in public areas and will assist limited English speakers to self-identify their language, simply by pointing to it. LEP will be able to select from a list of 22 languages.

### **(iii) How we will identify the primary language of our customers**

#### **Identification of LEP Status**

Language access liaisons should ascertain as soon as practical whether a customer is limited English proficient and, if so, the primary language spoken by that customer. It is recognized that evaluating the ability of the customer to communicate effectively is essential in providing good service.



## **Language Access Implementation Plan**

### **Primary Language identification**

Once a customer is determined to be LEP, his/her primary language should be determined and recorded in the LAMP database. Below are measures we will take to accurately determine a customer's primary language:

#### **Asking for Language Spoken at Home**

If a customer does not verbally identify his/her primary language, ask, "What language do you speak at home?"

#### **Use Language Identification Cards**

If liaison cannot identify a LEP customer's language by asking, we will use a Language Identification Card. The message underneath each language states: "Point to your language. An Interpreter will be called."

#### **Telephone Identification of LEP Individual's Language**

If the customer does not respond or does not otherwise seem to understand when presented with the aforementioned methods of language identification we will call Language Line (telephonic) and request an interpreter. Language Line's staff will assist in identifying the customer's language.

### **B. Translation of Written Materials**

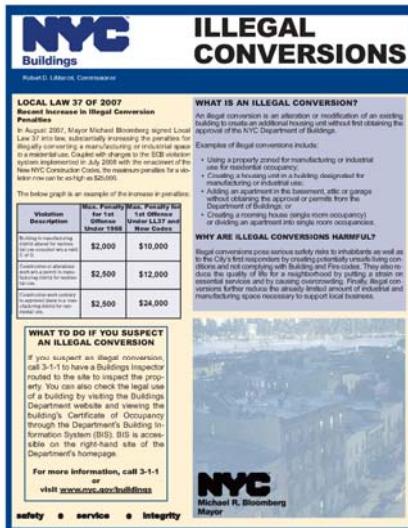
In some cases, we may provide oral interpretation in the place of written translation. For instance, oral interpretation might be an acceptable way of providing access when the translation of documents becomes so burdensome as to defeat the legitimate objection of the Language Access program. Other considerations are the importance of the service, benefit, the type of information sought, and whether the proportion of the LEP customers served warrants written translations. The Department is currently translating documents pertaining to public and worker safety.



## Language Access Implementation Plan

### Documents Currently in Circulation:

#### Illegal Conversions Fact Sheet



### Scaffold Safety Tips:

Available in six languages including English Spanish, Chinese, Russian, Polish and Arabic-Urdu

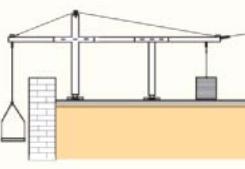
Scaffold Safety Tips		Scaffold Workers	Licensed Riggers and Foremen	Contractors and Owners
  <b>Always wear your harness!</b>	<p><b>Protect yourself!</b></p> <ul style="list-style-type: none"> <li>• You have the right to ask for a safe workplace.</li> <li>• Always use a safety harness attached to a safety rope.</li> <li>• You must take the scaffold safety training class and get a Certificate of Completion.</li> <li>• Find safety training classes at <a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a> or call 311.</li> <li>• 311 operators can give you the name, location and times of safety training classes. They can also tell you what languages the classes are given in.</li> <li>• When you finish your class, you will get a Certificate of Completion.</li> <li>• Show your Certificate of Completion to the licensed rigger or foreman at your job; he will give you a Certificate of Fitness to work at that job.</li> <li>• Do not work if there is NOT a licensed rigger or foreman on site.</li> <li>• Call 311 if you see unsafe conditions. You do not need to give your name!</li> </ul>	<p>A licensed rigger or a foreman is in charge of the job site. You are responsible for the safety of your workers. You must be on the job site whenever work is going on. If you are going to put a foreman in charge when you cannot be on site, the foreman must have a "tear-off" certificate to prove they can work in place of the rigger.</p> <p>This means that the licensed rigger must choose the person who will be the foreman, and the foreman must have in his or her possession a "Certificate of License Record" (also known as a "tear-off" certificate) from the licensed rigger.</p> <p>Licensed riggers can only get a "tear-off" certificate at the Department of Buildings' Licensing Unit, at 280 Broadway on the 6th floor. For customer hours please call (212) 566-4100.</p> <p>Make sure all paperwork involving proper safety and training is in order. Each scaffold worker must give you a Certificate of Completion of training before you can give the worker a Certificate of Fitness. Only workers that have had safety training get a Certificate of Completion. Workers must get safety training before getting on a scaffold. You cannot punish workers for asking you for training.</p>	<p>Job safety is your responsibility. It is very important that you understand and follow all of the safety rules when hiring riggers and trained workers. You must hire only licensed riggers and trained workers. To find out if your rigger has a license and insurance, visit the Department of Buildings website at <a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a>.</p> <p>The Department of Buildings will stop the work if the scaffold is not safe or if the workers are not safe and can also fine you up to \$15,000. You must follow all federal, state and city scaffold laws. Visit <a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a> and select "Construction Safety."</p> <p><b>Want more information?</b></p> <p><b>Call 311</b> or visit <a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a></p>	

## Language Access Implementation Plan

Recomendaciones de Seguridad para Andamios Suspensos	Trabajadores de Andamios	Aparejadores Certificados y Capataces	Contratistas y Dueños
<p><b>Protejase!</b></p> <ul style="list-style-type: none"> <li>Usted tiene el derecho a pedir un lugar de trabajo seguro.</li> <li>Utilice siempre un arnés de protección conectado a una cuerda de seguridad.</li> <li>Usted debe tomar la clase de entrenamiento de seguridad en andamios y recibir un Certificado de Finalización.</li> <li>Usted puede hacerlo aunque no tenga papeles. Encuentre las clases de entrenamiento de seguridad en <a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a> o llame al 311.</li> <li>Los operadores del 311 pueden darle el nombre, la dirección y las horas para las clases de entrenamiento de seguridad. Ellos también le pueden informar en qué idiomas se ofrecen las clases.</li> <li>Cuando complete las clases, usted recibirá un Certificado de Finalización.</li> <li>Presente su Certificado de Finalización al aparejador certificado o capataz de su trabajo, quien le proporcionará con un Certificado de Habilidad Física para trabajar en esa labor.</li> <li><b>NO TRABAJE si un aparejador certificado o capataz NO está presente en la obra.</b></li> <li>Llame al 311 si observa condiciones peligrosas! (Usted no tiene que dar su nombre).</li> </ul> <p><b>Siempre tenga su arnés puesto!</b></p> <p style="text-align: right;">Foto: NYC Building Safety</p>	<p><b>Trabajadores de Andamios</b></p> <p>Un aparejador certificado o capataz está a cargo de la obra. Usted es responsable de seguir las señales de sus trabajadores. Usted tiene que estar en la obra siempre que haya actividades de trabajo. Si usted va a poner a un capataz a cargo cuando no esté en el lugar, el capataz deberá tener un comprobante o certificado de sección desprendible ("tear-off") para comprobar que pueden trabajar en la obra en lugar del aparejador.</p> <p>Esto significa que el aparejador certificado debe escuchar el nombre de la persona que actuará como capataz, y el capataz deberá tener posesión de un comprobante o certificado con sección desprendible ("tear-off") de parte del aparejador certificado. Los aparejadores certificados solo podrán obtener comprobantes o certificados con secciones desprendibles ("tear-off") de la Unidad de Permisos del Departamento de Edificios [Department of Buildings, Licensing Unit], localizado en el 280 Broadway 6to piso. Para obtener el horario para clientes, llame al (212) 566-4100.</p> <p>Asegúrese de que todos los documentos relacionados con la seguridad apropiada y el entrenamiento se encuentren en orden. Cada trabajador de andamios tiene que proveerse un Certificado de Finalización de su trabajo de andamios y mostrarlo al aparejador certificado o capataz. Solo los trabajadores que hayan tenido entrenamiento de seguridad obtienen un Certificado de Finalización. Los trabajadores tienen que comprobar su entrenamiento en las secciones de poder montarse en un andamio. Usted no los puede castigar por solicitar entrenamiento.</p>	<p><b>Aparejadores Certificados y Capataces</b></p> <p>La seguridad en el trabajo es su responsabilidad. Es muy importante que usted comprenda y siga las reglas de trabajo seguras y cumplir con las normas de aparejadores y trabajadores entrenados. Usted debe de contratar aparejadores certificados y trabajadores entrenados. Para verificar si su aparejador tiene licencia y está asegurado, visite la página de internet del Departamento de Edificios [Department of Buildings] en <a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a></p> <p>El Departamento de Edificios detendrá la obra si los andamios no están seguros, o si los trabajadores no están protegidos, y también pueden multarla una cantidad de hasta \$15,000. Usted debe seguir todas las normas federales, estatales y locales de trabajo seguras. Para aprender más sobre la Ley de Andamios, usted puede dirigirse a la página de internet <a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a>, y seleccionar "Construction Safety [Seguridad en la construcción]."</p>	<p><b>Contratistas y Dueños</b></p> <p>La seguridad en el trabajo es su responsabilidad. Es muy importante que usted comprenda y siga las reglas de trabajo seguras y cumplir con las normas de aparejadores y trabajadores entrenados. Usted debe de contratar aparejadores certificados y trabajadores entrenados. Para verificar si su aparejador tiene licencia y está asegurado, visite la página de internet del Departamento de Edificios [Department of Buildings] en <a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a></p>

Scaffold Safety Tips	脚手架工人	持执照的索具装配员和工头	承包商和业主
<p><b>NYC BUILDINGS</b></p> <p><b>保护好自己!</b></p> <ul style="list-style-type: none"> <li>你有权利要求安全的工作场所。</li> <li>总是使用接在安全墙上的安全带。</li> <li>必须穿上脚手架安全训练课，并且取得结业证书（<i>Certificate of Completion</i>）。</li> <li>即使没有证件文件，你也可以上课。</li> <li>要寻找安全训练课，请访问<a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a>或拨打3-1-1查询。</li> <li>3-1-1接线员会告诉你安全训练课的名称、地点和时间。他们还可以告诉你用哪些语言讲课。</li> <li>上完训练课，你就会取得结业证书。</li> <li>在工作场所把结业证书给持执照的索具装配员或工头看。他会交给你在该工作场所工作的<b>合格证书</b>（<i>Certificate of Fitness</i>）。</li> <li>如果没有持执照的索具装配员或工头在场，不要工作。</li> <li>如果发现不安全情况，请拨打3-1-1举报 - 你不必露姓名！</li> </ul>	<p><b>脚手架工人</b></p> <p>持执照的索具装配员或工头负责管理工作场地。你须对工人的安全负责。每当工作进行时，你必须始终在工作场地。如果你不能在工作场地安排一名工头负责，工头必须有一份“派下的”证书，证明他们可以取代索具装配员工作。</p> <p>也就是说，持执照的索具装配员必须指名选出工头，而工头必须持有持执照的索具装配员发出的“派下的”证书。持执照的索具装配员只能从建筑部执照组（Licensing Unit, Department of Buildings）取得“派下的”证书。该单位的地址是280 Broadway 6楼。欲查询客户服务时间，请拨打(212) 566-4100。</p> <p>务必妥善保存关于适当安全和训练的所有文件。每一位脚手架工人必须给你一份训练结业证书。然后你才能发放工人合格证书。只有完成安全训练的工人才能获得结业证书。工人在上脚手架之前必须获得安全训练。你不能因工人要求训练而惩罚他们。</p>	<p><b>持执照的索具装配员和工头</b></p> <p>工作安全是你的责任。在雇用索具装配员和经过训练的工人时，你务必了解和遵循所有的安全法规条例。这很重要。你必须只雇佣持执照的索具装配员和经过训练的工人。欲了解索具装配员是否持有执照和保险，访问建筑部的网站：<a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a>。</p> <p>如果脚手架不安全或者工人不安全，建筑部将勒令停工，并且可以罚款达1500美元。你必须遵守联邦、州及市政府关于脚手架的全部法律。欲详细了解关于脚手架的法律，你可以上网：<a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a>，选择“Construction Safety”（建筑安全）。</p> <p><b>想获得更多信息吗？</b> 请拨打3-1-1查询，或者访问<a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a>。</p>	

## Language Access Implementation Plan

Scaffold Safety Tips	Строители-высотники	Дипломированные монтажники и прорабы	Подрядчики и владельцы
 	<p><b>Захищайте свои интересы!</b></p> <ul style="list-style-type: none"> <li>Вы имеете право потребовать предоставления безопасных условий труда.</li> <li>Помните про необходимость использования страховочного ремня, прикрепленного к предохранительному канату.</li> <li>Вы должны пройти курс по технике безопасности работы на строительных лесах и получить Сертификат о прохождении курса обучения (Certificate of Completion).</li> <li>Вы можете пройти обучение даже при отсутствии соответствующего диплома. Для получения дополнительной информации о курсах по теме техники безопасности смотрите на сайте <a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a> или позвоните по телефону 3-1-1.</li> <li>Операторы службы 3-1-1 сообщат вам название и место прохождения курсов по теме техники безопасности, а также сообщат расписание и укажут, на каких языках проводятся занятия.</li> <li>По окончании курсов вы получите Сертификат о прохождении курсов обучения.</li> <li>Принесите на работу свой Сертификат о прохождении курса обучения и покажите его дипломированному монтажнику или прорабу, и он выдаст вам Свидетельство о прыгодности (Certificate of Fitness), если вы могли работать на этом участке.</li> <li>Не применяйтесь за работу, если на стройплощадке НЕТ дипломированного монтажника или прораба.</li> <li>Познакомьтесь со всеми правилами техники безопасности, представляющими опасность – все зоны язычками, и вам не нужно сообщать свою фамилию.</li> </ul>	<p><b>Дипломированный монтажник или прораб – это лицо, отвечающее за подряд работ на строительной площадке. Вы несете ответственность за техников безопасности, находящихся в вашем подчинении. Вы обязаны постоянно находиться на стройплощадке во время выполнения работ. Если вы не можете присутствовать на стройплощадке и хотите поставить вместо себя другого прораба, этот прораб должен иметь «трэйнинг»-сертификат, свидетельствующий о том, что он может работать вместо данного монтажника.</b></p> <p>Это означает, что дипломированный монтажник должен указать фамилию человека, назначаемого прорабом, а данное присвоение должно быть подтверждено сертификатом от дипломированного монтажника. Дипломированный монтажник может получить «трэйнинг»-сертификат только в Лицензионном отделе Департамента строительства, расположенного по адресу: 280 Бродвея, 6-й этаж. Чтобы узнать часы приема, позвоните по тел. (212) 566-4100.</p> <p>Убедитесь в том, что вся документация, касающаяся соблюдения мер безопасности и курсов обучения, находится в дальнем порядке. Каждый строитель высотных должен представить вам Сертификат о прохождении курса обучения, ради чего вы должны выдать ему Свидетельство о прыгодности. Техники работники, проходившие курс безопасности, получают Сертификат о прохождении курсов обучения. Работники обязаны получить соответствующую подготовку в области безопасности до начала работы на лесах. Праху работников, занятых пересечениями в подготовке, не могут быть применены санкции.</p>	<p><b>Вы отвечаете за соблюдение правил техники безопасности на рабочем месте. Поэтому вам нужно, чтобы не только ваши подчиненные были привлечены к безопасности, но и подрядчики, субподрядчики и подрядчики, которые не являются вашими подчиненными, но работают на вашем объекте. Вы обязаны поддерживать на стройплощадке соответствующие процедуры при приеме на работу монтажников и квалифицированных рабочих. Вы должны принимать на работу только дипломированных монтажников и квалифицированных рабочих. Чтобы проверить наличие у монтажника соответствующего сертификата и страхового покрытия, посетите сайт Департамента строительства по адресу:</b></p> <p><b><a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a></b></p> <p>Департамент строительства может отменять работы, если работы на строительных лесах небезопасны, или если она представляет угрозу для безопасности рабочих. Департамент строительства также может штрафовать вас на сумму до 15 000 долларов. Вы должны соблюдать все федеральные законы, а также закон штата и города, касающиеся проведения работ на строительных лесах. Чтобы получить дополнительную информацию об этих законах, посетите сайт <a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a> и выберите раздел «Техника безопасности в строительстве».</p> <p><b>Вам нужна дополнительная информация? Позвоните по тел. 3-1-1 или посетите сайт <a href="http://www.nyc.gov/buildings">www.nyc.gov/buildings</a>.</b></p>

The next major language access outreach initiative will be our “Stay Connected” campaign. The campaign will serve as a strong reminder to construction workers to wear their safety harnesses and to keep their lifelines properly attached, as required by law. The citywide campaign will consist of various advertisements in English and Spanish and will commence in February 2009. A preliminary draft of the advertisement is below.



Winter 2009



## Language Access Implementation Plan

### 1. How We Will Identify Essential Documents

As per our internal survey we have found **the following documents to be essential to assisting our customers. We may translate the document, form, the instructions or both.**

- AEU-2: Certificate of Correction
- LS-4: No Access Notice
- Stop Work Order
- Vacate Order
- Violation Notice

We will have the documents listed above translated by September 2009.

#### Written translation:

The Department is currently translating documents pertaining to public and worker safety and will have essential documents translated by September 2009. The chart below will determine if the documents warrants written translation.

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more legitimate requests from self-identified customers	Translate essential documents.
More than 5% of request from self-identified customers and more than 50 in number.	Translate essential documents.
More than 5% of request from self-identified customers and more than 50 in number.	Translated written notice of right to receive free oral interpretation of documents.
5% or less of request from self-identified customers and less than 1,000 in number.	No written translation required.



## Language Access Implementation Plan

<b>Written Language Assistance</b>	<b>Languages</b>	<b>Determination</b>
Translate Essential Documents	Spanish Chinese Russian Korean Italian Haitian Creole	Based upon data, there are more than 1,000 speakers of these languages who self-identify that they speak English "not well" or "not at all" within the Department's jurisdiction.
Translated Written Notice of Right to Receive Free Oral Interpretation of Documents	Spanish Chinese Russian Korean Italian Haitian Creole	Based upon the Department's past experience with LEP persons encountered by staff, these are the most common languages for which interpretation is requested.
No Written Translation Required	All Others	While no written translation is required for other languages under the Language Access Plan, The Department will provide oral interpretation when requested by applicant/customers.



## **Language Access Implementation Plan**

**We will explore measures to determine when a document will be translated by:**

- Number of documents to be translated, broken down by language
- Quantity within a period of time
- Average document length (number of words per document)
- Required turn around time
- Intended audience

### **2. How We Will Use Plain Language Guidelines and Standards**

We will incorporate plain language guidelines and standards into all translated materials to ensure documents are easy-to-read. We will use the DoITT citywide contract for the translation of written materials. On December 10<sup>th</sup>, 2008 two staff members attended the first session of Customer Focused Writing offered by Easy to Read. We will send staff members from various units to an individualized session from the Easy to Read team.

### **3. Plan for translating our website**

The Mayor's Office, in conjunction with the Department of Information Technology and Telecommunications (DoITT), is developing an online language access policy pertaining to websites.

Once we procure the services of Language Line Services we will gradually upload essential documents to the website.

### **C. Signage at Public Service Centers**

Availability of interpreter services, free of charge, shall be prominently displayed in public areas of borough and central offices; in the most frequently encountered primary languages of customers served by those facilities. Signage will be available in all five borough offices and central units with service centers by September 2009:



## Language Access Implementation Plan

<b>Manhattan Borough Office</b>	280 Broadway	3 <sup>rd</sup> and 4 <sup>th</sup> Floors
<b>Manhattan Central Units:</b>	280 Broadway	
Boilers		4 <sup>th</sup> Floor
Elevators		4 <sup>th</sup> Floor
Facades		4 <sup>th</sup> Floor
Administrative Enforcement Unit		5 <sup>th</sup> Floor
Alteration Repair Application		5 <sup>th</sup> Floor
Budget and Fiscal		6 <sup>th</sup> Floor
Licensing		6 <sup>th</sup> Floor
Receptionist		7 <sup>th</sup> Floor
<b>Manhattan Central Units:</b>	One Centre Street	23 <sup>rd</sup> Floor
B.E.S.T Squad and Special Operations		
<b>Bronx Borough Office</b>	1932 Arthur Avenue	5 <sup>th</sup> Floor
<b>Brooklyn Borough Office</b>	210 Joralemon Street	8th Floor
<b>Queens Borough Office</b>	120-55 Queens Boulevard	5 <sup>th</sup> Floor
<b>Staten Island Borough</b>	10 Richmond Terrace	2 <sup>nd</sup> and 3 <sup>rd</sup> Floors

Areas of display shall include, but not necessarily be limited to, initial points of customer contacts, such as customer service areas, key points of entry and reception areas. We will implement translation services once the vendor is in place. We plan to implement and distribute materials once the vendor is in place to assist the staff with interpretation.



## Language Access Implementation Plan

### **1. How we will produce and post public notices regarding agency's provision of free language assistance**

- Procure standard walk-in welcome signage between July and September 2009
- Procure and post multilingual signage in conspicuous locations to inform LEP individuals that they can request free interpretation services
- Create and post multilingual way-finding and/or office signage; choose languages based on the available space and the languages spoken by our customers
- Include statements concerning language assistance in outreach materials and messages on our website
- Include message in presentations to agencies and organizations that refer customers to the agency

### **Outreach**

- Homeowner Night posters will be updated to include free offer of language access services message
- Website will include free offer of language access services message
- Inspectors will distribute materials stating free offer of language access services are available
- Develop outreach materials and education seminars to communicate to industry groups and public
- Provide information at open houses, workshops, and forums to private citizens, industry, community and civic groups

### **Language Access Desk Staff**

Staff stationed at Customer Service Desks of The Department facilities will publicize the availability of free interpreter services by prominently displaying multilingual signage and by issuing "I Speak" cards to customers whom they determine to be limited English proficient.

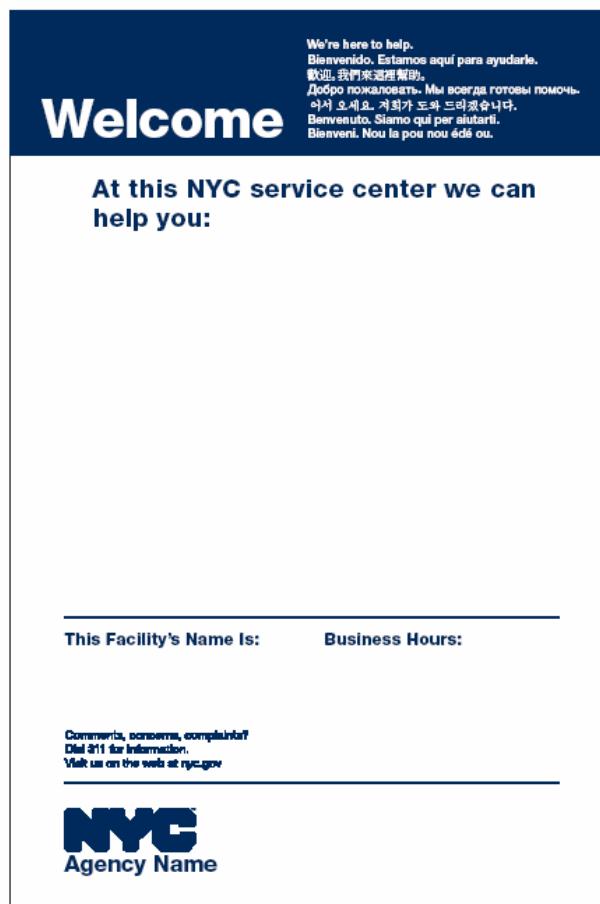


## Language Access Implementation Plan

### 2. How we will translate directional signage in service centers

Signage will be developed for all New York City walk-in facilities to notify customers of free interpretation services. Signage will include language access components once Language Line Services is procured.

#### Sample of Welcome signage



Note: This sign is not finalized and should not be used for distribution.



## Language Access Implementation Plan

### VI. Training

The Department's effective commitment to Executive Order 120 requires trained and knowledgeable staff.

#### A. How We Will Provide Training on Our Language Access Plan

Language Line will conduct the training sessions for employees who will be using the service, and also provides tools and documents to guide employees. This will require staff to know their obligation to provide meaningful access to information and services to LEP customers. To be effective, the Buildings' plan includes the following training requirements:

#### Training Guidelines

- New staff or staff whose job descriptions change to add contact with the public must be trained on LEP policies and procedures
- Staff should know about LEP policies and procedures, and how to implement them
- Inform staff of the possible penalties to the agency for failure to address LEP customers appropriately
- Staff having contact with the public will be trained to work effectively with in-person and telephone interpreters
- Staff should be aware of proper noticing requirements for LEP persons, to include posting of signs in common areas, stating in outreach documents that language services are available from the Department
- Staff should be aware of the types of language services available (i.e., interpretation and translation)
- Staff will be trained on how they can obtain these services for LEP customers
- Staff will be trained on how to respond to LEP callers
- Staff will be trained on how to respond to written communications from LEP persons
- Develop binder of LEP information for easy reference and accessibility
- Provide appropriate staff with "I Speak" cards and contact information to access the telephonic language assistance vendor
- Train staff on how to use Buildings' Language-Identification ("I Speak") cards
- Maintain training registry to record the names, dates and type of LEP program-related training employee receives
- Include overview during New Hire Orientation session



## **Language Access Implementation Plan**

The Department will provide a one-time orientation of the policies and procedures to all its employees in public contact positions. Training will be provided to new employees as part of their new hire orientation starting in September 2009. The more frequent the contact with LEP persons, the greater the need will be for in-depth training. Staff with little or no contact with LEP persons may only have to be aware of the LEP plan. However, management staff, even if they do not interact regularly with LEP persons, should be fully aware of and understand the plan in order to reinforce its importance and ensure its implementation by staff.

Refresher courses will be offered annually for Language Access coordinators and service center staff assigned to the program. All other employees will receive periodic updates.

### **B. How We Will Provide Training on Identifying a Customer's Primary Language**

The Director of Customer Service, working together with the Director of Buildings University will create a training briefing on Executive Order 120 that will provide instruction on the proper use of the language identification Card and the Language Access questions to be asked of all LEP individuals requesting services at Building facilities. Buildings staff will also document the individual's native language in an Access database. Procedures regarding documentation of an LEP individual's native language will be outlined in the training briefing document.

In addition, the Director of Human Resources will include a segment in the New Hire Orientation training on Executive Order 120 and Buildings' obligation and commitment to providing meaningful access to all individuals seeking services including LEP individuals. This enhanced training will include instructions on:

- How to use the Language Identification Card to be distributed during the training session
- A review of the pertinent questions to ask each LEP individuals to address their issue appropriately
- How to document the services offered by Buildings' staff and accepted by LEP individuals



## **Language Access Implementation Plan**

### **Dual Hand-sets**

Language Line will conduct the training sessions for employees, who will be using the service and equipment.

### **Use of Telephonic Interpreters**

Training will be provided by Language Line. Buildings will provide the policy and procedures for when to utilize the service.

### **C. How We Will Provide Cultural Competency Training**

The Customer Service Group (CSG) is working with the Department of Citywide Administrative Services (DCAS) to incorporate language access and cultural sensitivity into re-developed training for front-line staff.

## **VII. Record Keeping and Evaluation**

### **A. How We Will Ensure the Quality of Our Language Access Service**

The Department will maintain records pertaining to the requests for services in non-English languages and our capacity to serve these populations. We will track the following information: To assure the success of the language assistance program, the Community Advisory Committee (CAC) will monitor the LEP program periodically, but not less than annually, to assess the effectiveness and efficiency of the program. Monitoring may include, but not limited to:

1. Systematic feedback from LEP clients;
2. Systematic feedback from staff;
3. Periodic in-house reviews of the current communications needs of LEP clients; and
4. Periodic contact with community-based organizations that provide services to LEP clients



## **Language Access Implementation Plan**

### **B. How We Will Maintain Records of the Language Services the Agency Provides**

The Department will require monthly reports to be prepared by each of the borough offices and central units to be recorded in the LAMP data base monitored by the Language Access Coordinator.

The Language Access Coordinator will ensure the data is captured and sent to Program and Management Analysis (PMA) to be included in the Mayor's Management Report (MMR).

- Create a monitoring/quality assurance system
- Implementation of a data collection system as outlined in the language access plan
- Oversight and quality assurance of the agency's language access services
- Assignment of a language access liaison for each borough office and central unit to monitor customer service and quality assurance issues for their office/department
- Monthly reports to Language Access Coordinator via liaisons
- Creation of a periodic survey of LEP clients to determine the quality of the translations and interpretation services provided



## Language Access Implementation Plan

The Department will develop and maintain a system to collect the languages of LEP individuals requiring our services. The collection of information will be recorded during:

- In-Person visits
- Telephone calls to the agency
- Data recorded by 311
- Outreach involving the public
- Community and Civic meetings
- Forums
- Conferences
- Workshops
- Scheduled appointments
- Homeowners' Night
- Inspections

### C. How We Will Ensure Compliance with the Executive Order

The Department will monitor compliance with Executive Order 120 by conducting periodic evaluations and an annual survey to obtain feedback from our LEP customers and community organizations.

- Create an evaluation system
- Site visits
- Aggregate data
- Report the number of LEP customers served in the MMR on a monthly basis
- Create a yearly report, supervised by the language access coordinator, that lists site visit survey results, activities to date and other indicators for successful language access service provision
- Review the language access plan annually



## Language Access Implementation Plan

- Review the language access plan for the following:
- Changes in the LEP population, in the service area, or population affected or encountered
- Changes in the frequency of encounters with LEP language groups
- Changes in the types of services to LEP persons
- Changes in resources including new technologies, additional resources, and budget availability
- Effectiveness of existing language assistance to LEP persons
- Staff knowledge of the agency's Language Assistance Plan and how to implement it
- Whether identified sources for assistance are still available
- Need to add additional language as a consideration in hiring staff
- Need to hire an interpreter on staff
- Need to revise contract(s)
- Need to contract for additional interpreter services
- Feedback from the community at-large and from minority language groups and persons
- Complaints filed due to language access problems



## **Language Access Implementation Plan**

### **VIII. Resource Analysis and Planning**

#### **A. How We Will Leverage Current Agency Resources to Implement Plan**

##### **1. Use of existing Contracts for Services and Training**

Based on the results of our internal survey, 311 data and our current resources; we have elected to procure Language Line Services, Inc. to provide training, foreign language interpretation and translation services.

##### **2. Creation of Volunteer Language Bank**

At this time, the Department elects to utilize our current bilingual staff and Language Line services to provide foreign language interpretation and translation services to implement our language access plan. If cost becomes an issue, we will look at cost-saving ideas as follows:

- Expand outreach for volunteer language bank participants
- Centralize interpreter and translation services
- Use qualified community volunteers



## **Language Access Implementation Plan**

### **B. How We Will Leverage Current Agency Resources to Implement Plan**

#### **How We Will Utilize Citywide Resources**

We will utilize the Agreement for the Provision of Foreign Language Interpretation Services of the City of New York and Citywide between the Department of Information Technology and Telecommunications (DoITT) and Language Line Services, Inc.

We will utilize the Mayor's Office of Immigrant Affairs and Office of Operations to obtain assistance pertaining to the development and execution of the Department's implementation plan.