

Department of Information Technology & Telecommunications
Language Access Plan

I. Mission

The ***Department of Information Technology & Telecommunications (DoITT)*** oversees the City's use of existing and emerging technologies in government operations and its delivery of services to the public. DoITT coordinates Citywide IT policy and planning; designs, builds and maintains information systems that support City operations; provides public access to City information through 311, *NYC.gov*, and NYC TV; and serves in a regulatory capacity for telecommunications franchises.

By fulfilling the goal of utilizing technology to improve the performance of New York City government and thereby enhance the delivery of services to the public, DoITT meets Mayor Bloomberg's three tenets of government: accessibility, accountability, and transparency.

Direct Services

The ***311 Customer Service Center***, which launched in March 2003, provides the public with quick and easy access to all New York City government services and information while maintaining the highest level of customer service. Calls to 311 are answered by a live call center representative, 24 hours a day, 7 days a week, 365 days a year. The implementation of 311 has assisted agencies in improving service delivery by allowing them to focus on their core missions and manage their workload efficiently. 311 provides insight into ways to improve City government through accurate, consistent measurement and analysis of service delivery Citywide.

NYC.gov is New York City's official website. It provides a single point of entry to all City agencies' public websites through one URL: www.nyc.gov. The home page contains Mayoral and agency information, breaking news, highlights, links to City services, and links to all agency websites. Users can quickly find services without knowing the name of the agency that provides the service. *NYC.gov* allows easy access to the widest possible audience in a quick, convenient, and efficient manner. *NYC.gov* also provides a caller with the ability to report a problem online and check the status of a pending service request.



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II. Language Access Goals

- a. The 311 Customer Service Center is the primary vehicle used by residents, businesses, and visitors to New York City, to obtain non-emergency government information and services throughout the 5 boroughs. By dialing one easy to remember telephone number, a caller can obtain information for over 3,600 city services, process a service request, or be transferred to another city agency for assistance. 47.8% of the population of New York City (ages 5 and older) speaks a language other than English at home. 23.5% are not proficient in English (obtained from 2006 Department of City Planning data.) Recognizing the needs of those with Limited English Proficiency (LEP) in New York City, 311 has provided interpretation services since March of 2003. The goal of DoITT is to ensure that **all** callers are offered an opportunity to communicate with 311, regardless of English proficiency, and that they receive the same level of customer service as any other caller who is able to communicate in English.

The goal of NYC.gov is to support agencies in providing an outlet or outreach tool for translated documents.

Many DoITT and 311 initiatives have been in progress for over 5 years:

- 311 provides interpretation services in the most common languages spoken and read by LEPs in New York City: Spanish, Chinese, Russian, Korean, Italian, and Haitian Creole and thus is already compliant with Executive Order 120
- 311 also offers interpretation in a total of 179 languages by means of a language vendor contract
- 311 employs internal staff who are bilingual in English and Spanish
- A Spanish glossary of frequently used City terminology has been created for use by Spanish speaking customer service representatives
- Interpretation services are available 24 hours a day, 7 days a week
- 311 employs over 360 representatives covering 3 shifts: day, evening, overnight
- Average speed of answer to speak to a 311 agent is 6 seconds
- During the new hire training process, 311 representatives are trained on how to interact with callers who are limited in their ability to communicate in English. This training entails language identification and interaction with the caller through use of an interpreter.
- Interpretation services are free to the caller



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- Average time to have an interpreter join a call is 30 seconds for Spanish, Mandarin, Russian, and Cantonese and 45 seconds for all other languages.
- Enhanced 311 (aka 211), which provides access to health and human social services, is also available in 179 languages, 24 x 7 x 365
- A multi-language Interactive Voice Response (IVR) interface was piloted in November 2007 and officially launched in April 2008. This service provides callers who speak Spanish, Mandarin, Russian, Cantonese, Korean and Haitian Creole the option of listening to current 311 prerecorded announcements such as “alternate side of the street parking” information in their native language. This saves the LEP time by eliminating the need to speak with a 311 agent. Subsequently, it saves the City revenue by eliminating agent time and/or the cost of an interpreter.
- 6.6% of 311 callers listen to the IVR announcements in Spanish, Mandarin, Russian, Cantonese, Korean, and Haitian Creole. The recording advises the LEP that he/she will be connected to an English speaking representative who will conference an interpreter in their respective language. All other callers opt to listen to the IVR in English.
- After listening to the non-English IVR prompts, LEPs have the option of speaking with a live customer service agent who will quickly conference an interpreter to the call
- Average time to conference an interpreter to an existing call is 30 seconds for Spanish, Mandarin, Russian, and Cantonese and 45 seconds for all other languages
- 311 customer service agents speak to the LEP through the interpreter and thereby receive the same service as English speaking callers
- In 2007, 1.82% of total calls to 311 were serviced in non-English. As a result of the Mayor’s Office of Immigrant Affairs (MOIA) marketing campaign and the launch of the 311 multi-language IVR in April 2008, calls handled in non-English in 2008 have increased to 2.85% (% of total calls through Nov.)

The Director of Web Strategy and Operations for *NYC.gov* is responsible for coordinating language strategies and implementation for *NYC.gov* with the Mayor’s Office of Operations.

The Department of Information Technology and Telecommunications contracted with Language Line Services on July 1, 2006. The contract is designed to allow other agencies the ability to establish a Task Order under the umbrella of the DoITT Contract. Not only does this alleviate other agencies



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from having to undergo the arduous and costly Request for Proposal (RFP) process, other agencies will benefit by having their Language Line calls billable at a discounted rate which is applicable to clients with high call volumes. Since 311 calls to the vendor have always exceeded the quota for application of the discounted rate, other agencies will benefit regardless of their call volumes.

The 311 Director of Administration and Vendor Manager for the DoITT contract with Language Line Services is DoITT's Language Access Coordinator. She is responsible for overseeing the agency's Language Access Plan, implementation of ongoing and new initiatives that will enhance language access, and updating the LAP annually. She is also responsible for managing the relationship with Language Line Services.

The Assistant Commissioner, DoITT – Citywide Program Management and the Administrator for DoITT – Citywide Contracts can assist other agencies in establishing a Task Order with Language Line under the umbrella of the DoITT contract.

The Executive Director of 311 and *NYC.gov* is responsible for the provisioning of language access through the 311 IVR, the 311 Operations Team which include the Call Center Representatives (CCRs) and the vendors that support 311, the Content and Agency Relations Group, 311 Reporting, and *NYC.gov*.

- b.** DoITT and 311 have been forerunners in providing language access in 179 languages to the constituents of New York City. During the last 5 ½ years, all callers to 311 who required language assistance have received information for non-emergency City government services in non-English as required.



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LEP Population Assessment

a. U.S. Department of Justice (DOJ) Four-Factor Analysis:

1. The number or proportion of LEP persons in the eligible service population

The current population of New York City is approximately 8.3 million. According to 2006 Department of City Planning data, 47.8% of the population of NYC speaks a language other than English at home with 23.5% not having any English proficiency. **All LEPs**, regardless of language, are considered eligible for interpretation service.

(City Planning data is applicable to both 311 and NYC.gov.)

2. The frequency with which LEP individuals come into contact with the agency

Primary access to all non-emergency New York City government services is via the 311 Customer Service Center.

- Since the launch of the multi-language IVR in April 2008, calls to Language Line increased by 41% as compared to the same period in 2007
- 92.9% of all calls where a Language Line interpreter was utilized during the call are in the top 6 languages requested by callers to 311: Spanish, Mandarin, Russian, Cantonese, Korean and Haitian Creole. (Historically, call volumes to 311 requiring interpretation in Italian is minimal. During the first 11 months of 2008, calls requiring interpretation in Italian equated to 0.4% of all calls to Language Line.)
- NYC.Gov is the web portal and web page for all New Yorkers wishing to access City Services, and therefore the demographics of the City reflect the possible audience and customer base for NYC.gov. We have not done analysis in the past on how LEP New Yorkers, specifically, use NYC.gov

3. Explanation of the nature and importance of the program/services for the LEP person requiring language assistance

Providing non-English callers with the option to speak in their native language or a language they are most comfortable speaking encourages them to call 311 for assistance with obtaining government services or



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information. Call volumes to 311 have increased incrementally year over year since 2003. Calls requiring language assistance that were routed to Language Line have also increased incrementally. 311 formally launched multi-language IVR announcements on April 21 2008. As previously stated, calls requiring language assistance in these languages (Spanish, Mandarin, Russian, Cantonese, Korean, and Haitian Creole) have increased by 41% when compared to call volumes for the same period for the previous year (May – Nov 2008 vs. May - Nov 2007.) This supports enhanced benefits to the LEP by promoting awareness of interpretation service availability in the top languages.

During a 311 call with an LEP where interpretation services are engaged and it is discovered that the call is an emergency situation which requires a “hot transfer” to 911, the 311 agent will immediately conference the caller along with the interpreter with 911 and remain on the call until the 911 operator authorizes 311 to disengage.

While having access to NYC.gov is important for LEP customers, DoITT’s first priority has been access to 311.

4. The resources available to the agency and the cost of providing language services

In addition to already providing interpretation services in 179 languages through Language Line, 311 employs customer service representatives who are able to converse with the callers in Spanish. (This number varies slightly from month to month based upon attrition and new hires.)

For FY 09, the DoITT budget includes the cost of providing language services to its constituents. However, when evaluating cost comparisons for the top 6 languages during the last 7 months of 2008 with the cost of providing language services for the same languages during the same period in 2007, expenditures for language provisioning have increased by 52% and most likely will continue to increase as public awareness increases. It is anticipated that as each City agency becomes compliant with Executive Order 120, 311 call volumes requiring interpretation service will continue to increase until they eventually normalize.

May-November Combined Comparison			
2008 vs. 2007	Total Calls	Total Minutes	Charges
Variance	15,446	176,714	\$159,042
% Difference	41%	52%	52%



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In 2008, DoITT issued a Request for Information (RFI) to gauge the market in terms of methods and costs associated with providing a professional manually translated, hosted solutions for alternate versions of the *NYC.gov* website. The RFI demonstrated that the costs associated with providing a manual translation solution for the website were extremely prohibitive. Therefore, DoITT and the Mayor's Office determined that an automated translation solution would be leveraged for the initial implementation of language access on *NYC.gov*.

b. Utilization of the top 6 Citywide LEP languages

While interpretation and documentation translation services are available in the top 6 Citywide LEP languages included in the Executive Order, as previously stated, 311 already offers these services in 179 languages.

III. Implementation Logistics

a. Timeline for implementation of LAP

DoITT's Language Access Plan has been a work in progress for over 5 years and has proven to be effective and worthwhile. Presently, we do not have any new DoITT generated or agency requested programs planned. It is the intent of the agency to continue with the existing methodology previously described for provisioning language access to its constituents.

DoITT has a Language Access Coordinator who:

- Manages the DoITT contract with Language Line Services
- Oversees the relationship between the vendor and the City
- Can provide guidance to other agencies who are interested in establishing Task Orders under the umbrella of the DoITT contract
- Collaborates with DoITT Contracts Department
- Monitors Service Level Agreement and Failed Call Reports and application of the contract
- Manages document translation requests for DoITT
- Supports the training, quality assurance and operations teams at 311 for interpreter related items
- Monitors calls where an interpreter is utilized



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- Refers problems through the vendor's Voice of the Customer Process (VOC)
- Interacts with DoITT Telephony and IT personnel regarding technical problems encountered with Language Line calls and escalates to the vendor for resolution

b. Major milestones:

- Mar 2003 - Jun 2006 - 311 contracted with a language service provider, Language Services Associates (aka Interpretalk)
- Jul 2006 - DoITT entered into contract with Language Line Services for 3 years. Contract includes two (2) consecutive one-year renewal options. (DoITT has decided to renew the contract with Language Line Services in Jul 2009)
- Nov 13, 2007 – Feb 2, 2008 - 311 and MOIA partnered to pilot a multi-language IVR
- Apr 21, 2008 - 311 officially launched a multi-language IVR (Spanish, Mandarin, Russian, Cantonese, Korean, and Haitian Creole)
- Apr 21, 2008 - CEO marketing blitz commenced utilizing radio announcements and posters in subway stations to promote awareness of the availability of language services
- Jul 2008 - *NYC.gov* launched the first fully manually translated Spanish site for the Office of the City Clerk (www.CityClerk.NYC.gov)
- Oct 2008, a 2 year project came to fruition - the launch of the Spanish version of the Office of the Mayor's website
- Ongoing - DoITT and 311 host tours of the 311 Call Center. Dignitaries, government officials, and personnel who are considering creating 311s in their respective county, state, or country through the world use NYC 311 as a model. During these tours and presentations, emphasis is placed on cultural diversity and the need to provide interpretation and document translation services to those constituents who are seeking assistance from City government. Visitors from foreign countries are usually quite impressed that they are able to call 311 and speak in their native language.
- Feb 2009 – In partnership with Betsy Gotbaum, The Public Advocate for the City of New York, new services will be added to the 311 system which provide information that will help immigrants who reside in New York City learn more about eligibility for additional public benefits.
- 2nd Qtr 2009 – Enhancement of new hire training for 311 customer service representatives which will include role-play scenarios on how to interact with a LEP caller and simulate calls to Language Line.
- Jul 2009 – One-year renewal of DoITT Contract with Language Line.
- 3rd Qtr 2009 – In partnership with Deputy Mayor Gibb's Office and



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- Gordon Campbell of United Way, the 311 Training Team will develop and deliver training to customer interfacing staff at the offices of Elected Officials which will demonstrate how they can improve their interaction with LEPs and provide information about many of the services offered by 311 that are offered and beneficial to immigrants.
- 4th Qtr 2009 – NYC.gov portal will provide an LEP user with a link to a free automated translation service. We anticipate utilizing “Google” as the vehicle for this free service.

c. DoITT’s Agency Access Coordinator

The 311 Director of Administration and Manager of DoITT’s Language Line contract is DoITT’s Language Access Coordinator. She is responsible for overseeing the agency’s Language Access Plan, implementation of ongoing and new initiatives that will enhance language access, and updating the LAP annually.

IV. Service Provision Plan

a. Interpretation services

DoITT maintains the parent contract with Language Line Services which is available for use by other agencies via a Task Order. Telephonic interpretation services are provided by select internal bilingual staff for Spanish and by the vendor in 179 languages (including Spanish residual calls.)

Therefore, 311 utilizes Language Line Services to provision for language access in 179 languages which include the top 6 languages identified by the Executive Order. Once the Call Center Representative is made aware of the need for an interpreter and is able to identify the language, he/she will initiate a conference call to Language Line and an interpreter will join the call. In the event that the foreign language spoken cannot be identified, the CCR will conference Language Line and request to speak with someone who is skilled in language identification. Once the identification is made, an interpreter will join the call.

311 call volume history (data obtained from Language Line’s monthly reports) indicate that 92.9% of calls requiring use of an interpreter are in 6 languages: Spanish, Mandarin, Russian, Cantonese, Korean and Haitian Creole. Call volumes in other languages are comparatively minimal.



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b. Translation of written material

DoITT disseminates essential public documents produced by other agencies as per interagency agreements. These agreed upon processes and procedures are contained in an Oracle Siebel database which is accessed by customer interfacing personnel during each call and maintained by DoITT's Content and Agency Relations team. DoITT does not produce any essential public documents independent of other agencies.

DoITT prefers to utilize the vendor as the prime source for other types of written (non essential documents) translation work. We have utilized Language Line to translate Siebel content, which is read to the 311 caller, into Spanish for the ACS and Nicotine Patch Smart Scripts. This enables the script to be read in Spanish by 311 bilingual customer service representatives. We have also used the vendor for translation of the verbiage for the multi-language recorded IVR messages.

Quality assurance is first performed by Language Line. Language Line's document translation quality assurance begins with recruiting qualified translators who are tested and must score an "A" rating to be hired. Once a document has been translated, it is review by Language Line's Quality Assurance Team before being approved for release to the client. Language Line builds a glossary of frequently used words and phrases for future translation work requested by the client.

Quality Assurance is also performed by internal 311 employees who are fluent in another language. They are utilized to proofread translation jobs completed by the vendor. We have also utilized volunteers from the Citywide Volunteer Language Bank for proofreading purposes for the multi-language IVR scripts and the MOIA Marketing Ad Campaign. Recommendations are made to edit translation work produced by the vendor when it would be more appropriate to use different terminology.

We have also partnered with other agencies for 311 Outreach. This involved creation of posters and ads in other languages. "Plain language" that is simple to read, easy to understand, and free of internal jargon is utilized for this purpose.

The Mayor's Office, in conjunction with the Department of Information Technology and Telecommunications, is developing an online language access policy for *NYC.gov*. The following is being evaluated:

- Feasibility of linking viewers to an external automated translation tool (such as *Google Translator*) which would allow for free translation of information located on *NYC.gov* Portal.



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- Each agency will be responsible for identifying consumer interfacing “essential” documents and the feasibility of having them translated into the top 6 languages identified by the Executive Order. Each agency can leverage the Language Line contract for this purpose. A strategic link can be created between each agency’s website and *NYC.gov*.
- DoITT will work with any agency in need of technical assistance in implementing the automated translation functionality within their site or the addition of manually translated content they elect to publish on their site. DoITT will implement the automated translation solution within 90 days of the publishing of an agency’s approved Language Access Plan, if such assistance is required.
- DoITT will explore the feasibility of creating a “Language Portal” that could serve as a central point of access to translated Agency materials that represent vital City information services. This portal would direct visitors to where other Agency specific essential documents can be found on *NYC.gov*.
- The feasibility of translating certain components of the *NYC.gov* website is largely governed by exorbitant costs that would be incurred initially and for on-going maintenance. The Mayor’s Office of Operations and the Department of Information Technology and Telecommunications will provide a web strategy for language access. However, each agency will be responsible for defining their essential public documents, having them translated into the foreign languages, and posting them on their agency’s website.
- DoITT, at the request of the Mayor’s Office, will upload each agency’s Language Access Plan on the “About Us” page of their agency’s website and at a central location at the Mayor’s Office of Immigrant Affairs (MOIA) site.

The Director of Web Strategy and Operations for *NYC.gov* is responsible for coordinating language strategies and implementation for *NYC.gov* with the Mayor’s Office of Operations.

As previously mentioned in Section IV (b), *NYC.gov* launched the first fully manually translated Spanish site for the Office of the City Clerk (www.CityClerk.NYC.gov) in July 2008 and in October 2008, the Spanish version of the Office of the Mayor’s website was launched.



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c. Signage at public centers

Since DoITT does not have walk-in facilities for customers, we will not need to create multi-language signage for our agency.

Other City agencies make reference to Dial 311 on their signage.

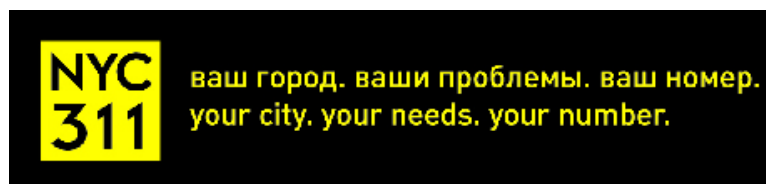
Other agencies can leverage the DoITT contract with Language Line to create signage in other languages.

d. Outreach

DoITT will continue to assess opportunities that will increase public awareness of language access. The agency will consider other languages when producing marketing materials for distribution to the public.

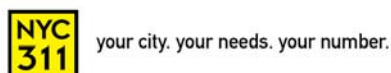
Timeline: The following describes initiatives that have been done or are currently in progress:

- Public awareness of language accessibility is promoted daily to callers to 311 via upfront **IVR announcements** in 6 foreign languages
- The **311 Brochure** will be translated and printed in other languages. (A revised brochure is currently in production in English. Once finalized, we will begin to have it translated into Spanish, Chinese and Russian. Other languages will be considered as needed.) Timeline: 3rd Qtr 2009.
- **Bumper Stickers** in other languages (Spanish, Chinese, Russian, Korean, Haitian Creole, and Arabic) are posted on NYC Taxi & Limousine Commission (TLC) licensed yellow taxicabs and on City vehicles



Bumper Sticker – Russian

- **311 Banners** have been created in other languages and hung in local communities during special events such as street fairs and parades.



- **Yellow “311” posters** targeting types of services provided by 311 (using “311” as a verb) have been translated into Spanish, Chinese, Russian, Korean, Haitian Creole, and Arabic. These posters have been distributed and posted in City Agency offices that are customer facing, in subway cars and stations, on bus shelters, in community based and non-profit organization offices, etc.

Simplified Chinese Poster



- **Public Service Announcements (PSAs)** advertising “Call 311” have been produced in Spanish, Chinese, Russian, Korean and Haitian Creole and have been aired on public access and local cable TV stations
- The 311 Call Center hosts visiting dignitaries from all over the world. They **tour** the center and are impressed by our provisioning of service in 179 languages. Many enjoy simulating a call to 311 in their native language.
- 311 personnel attend **Community Board District Service Cabinet and Borough Service Cabinet** meetings. At these meetings, they often learn about the needs of the constituents in localized areas for specific ethnic populations. 311, in partnership with the Office of the Deputy Mayor for Health and Human Services, promoted calling 311 to obtain information on health and social services over a 7 week period last spring in ethnic press and local publications such as: El Diario, Hoy, El Nacional, Russkaya Reklama, Novoye Russkoye Slovo, Sing Tao, Ming Pao, Epoch Times, Korea Central Daly, Haiti Observer, etc.



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- Other City agencies promote “DIAL 311” in foreign languages on their literature
- 311 supports communities through participation in local events such as **street fairs and parades**. 311 will explore opportunities to increase language access awareness by targeting non-English populations at these events.
- Feb 2009 – In partnership with Betsy Gotbaum, The Public Advocate for the City of New York, 311 will provide information about “The Guide to Public Benefits for Immigrants.” 311 customer service representatives will inform callers who have questions about the guide and its uses and the languages in which it is available. Callers will be directed to call The Public Advocate’s Office to request a copy in English, Spanish, Chinese, Russian, Korean and Bengali.

V. Training

a. **Training on language access**

Timeline: All front-line 311 staff are trained on language provisioning during new hire training:

- Call Center Representatives (CCRs) receive 4 weeks of classroom training with an intense emphasis on customer service skills and techniques
- As part of the training, 311 agents are trained on how to interface with a caller who does not speak English or whose communication skills are limited in English
- CCRs are instructed on how to handle a call when they are unable to readily identify the caller’s language
- CCRs use CTI (Computer Telephony Integration) which allows them to almost instantaneously connect to Language Line and conference an interpreter to the call
- CCRs are trained to speak to the caller through the interpreter so that the caller receives the same service an English speaking caller would receive
- During new hire training, 311 trainers review the Language Line Job Aid “Tips for Handling Language Line Calls”

Internal bilingual Spanish staff at King TeleServices (vendor utilized to support 311 call volumes) must pass an internally developed language assessment test approved by the City to be qualified to handle 311 Spanish calls.



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Language Line employs professional interpreters from 3 top level tiers: “A” rated interpreters have two or more years experience, have a Translation and Interpretation degree, or hold Federal, Consortium or California State Court Certification. “B” rated interpreters might not have a formal interpreting degree but have an advanced degree (Masters or Ph.D.) in a language related field. “C” rated interpreters have a college degree and experience in a field serviced by Language Line (healthcare, education, finance.) The vendor utilizes highly qualified testers to administer an “Interpreter Skills Assessment Test.” Additionally, interpreters are assessed on their ability to speak clearly, remain neutral, maintain accuracy in both languages, process information quickly and concisely, be sensitive to cultural differences, be professional and courteous, use appropriate industry terminology, and understand industry practices and procedures. Newly hired interpreters receive a 3 week orientation program and on-going training and coaching.

The Customer Service Group (CSG) of the Mayor’s Office of Operations (MOO) is working with the Department of Citywide Administrative Services (DCAS) to incorporate language access and cultural sensitivity into redeveloped training for front-line staff.

b. Identifying a customer’s primary language

311 CCRs will acknowledge a caller’s request for a non-English language. If unable to determine the language needed by the caller, the 311 CCR will connect to Language Line and request to speak with someone who is skilled in language identification.

c. Cultural competency training

- The Department of Information Technology and Telecommunications is an Equal Employment Opportunity (EEO) Employer. DoITT is committed to the federal, state and city EEO Laws as well as the Citywide EEO policies and procedures.
- During new hire training, as part of the customer service component, 311 CCRs are trained to be sensitive to the caller’s needs and how to professionally interact with someone who is Limited English Proficient
- 311 personnel also receive a 3 hour EEO orientation class which addresses cultural diversity in the workplace and when dealing with external customers
- Posters written in other languages are positioned throughout the call center to remind the CCRs about our sensitivity to the diverse population of callers to 311



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- During Customer Service Week, a nationally celebrated event, an entire day was devoted to cultural diversity. This included an international “pot luck” food event, employees wearing ethnic attire, cultural presentations describing one’s heritage, locating one’s native country or country of ancestors on a large world map, and playing games such as Language Line Jeopardy and International Taboo to test knowledge of language call handling procedures.
- Language Line also discusses cultural competency during new interpreter training with a focus on the following key items:

Cultural Differences

- **Be aware of possible cultural differences**
- **Remind yourself that a Limited English Proficient (LEP) individual may have cultural differences from you, such as different backgrounds, level of education and experiences.**
- **Cultural differences can sometimes ‘distort’ communication**
- **Language dynamics may differ within each culture**
- **If you sense that the Limited English Proficient (LEP) individual is not understanding, please try to rephrase the question in a different manner.**



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VI. Record Keeping and Evaluation

a. Ensuring quality of language access services

All 311 calls are recorded. The 311 Quality Assurance Team (QAT) monitors recorded calls daily for all shifts. Bilingual QA evaluators listen to Spanish calls and provide coaching and development to the CCRs. 311 supervisory staff also evaluate and coach Spanish calls. In addition to Spanish, the QAT also evaluates calls handled in other languages to ensure that the English speaking 311 agent and the interpreter are in sync with providing the caller with quality service.

Language Line Services similarly has a Quality Assurance Team that monitors live calls without the knowledge of the interpreter. A Senior Language Specialist provides coaching feedback and identifies training and developmental needs.

Language Line has a formalized process known as “Voice of the Customer” (VOC) which ensures that coaching feedback is provided within one business day regarding concerns expressed by the client and of any action taken. The vendor uses the VOC process to target key areas that may require a developmental program for interpreters. 311 managers and supervisors refer problematic Language Line calls to the 311 Vendor Manager for review and escalation to the vendor.

b. Maintaining records of the language services provided

Language Line provides monthly and quarterly reports which include the number of calls and minutes by language.

Reports produced by the DoITT Telephony organization provide the number of callers who listened to the upfront IVR announcements by language. Some calls are resolved by the IVR while other callers chose to speak with a live agent. The number of callers who listen to the IVR in language does not constitute the number of callers who require an interpreter. Some callers speak English but listen to the prompts in their native language while others may have reached a foreign language IVR announcement merely because they selected an incorrect prompt.

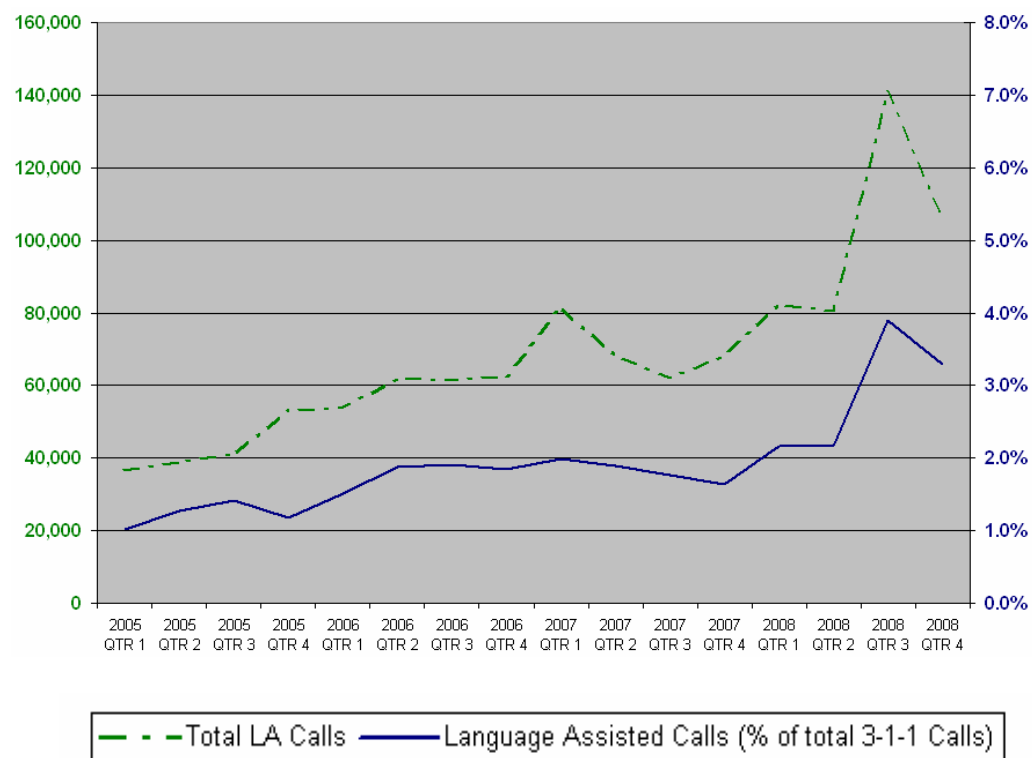


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Citywide Performance Reporting (CPR), which is published on *NYC.gov*, can be utilized to determine the number of calls handled in non-English. This data includes internally handled Spanish calls and calls where a Language Line interpreter assisted with the handling of the call.

Sample from CPR

The following graph depicts trends for calls to 311 over the last 3 years that were handled in a language other than English. As you can see, there is a continuous increase in the trend.



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c. Ensuring compliance with Executive Order 120

DoITT has provided language access in 179 languages prior to Executive Order 120 and will continue to do so.

The following items ensure compliance with the Executive Order:

- Since language access is a critical indicator for the agency, DoITT monitors call volumes and consumer needs which include language provisioning, on a monthly basis
- All 311 calls are recorded, including calls using a Language Line interpreter
- The Quality Assurance Team evaluates calls handled in other languages to measure the level of customer service
- Language Line call volumes by language are reviewed monthly to assess changes in the LEP population
- Annual review to determine feasibility of hiring staff who are bilingual in other top languages besides Spanish
- Utilization of the Voice of the Customer (VOC) process to assess performance of vendor's interpreters
- Application of Service Level Agreements when vendor fails to provide contractually agreed upon services
- Feedback from Community Boards, Borough Presidents' Offices, and the Mayor's Office of Immigrant Affairs
- Caller feedback – complaints filed as a result of language access problems
- Updating the Language Access Plan annually

VII. Resource Analysis and Planning

a. Leveraging current agency resources to implement the DoITT LAP

- DoITT hosts the parent contract with Language Line Services. Language Line Services is considered an expert in the industry for over 25 years. They provide certified interpreters and translators.
- 311 hires staff who are bilingual in Spanish
- Volunteer Language Bank.



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Currently, DoITT seeks assistance from bilingual employees for the purpose of proofreading documents which have been translated by the vendor. We have found that New York City personnel are sometimes able to make alternate recommendations for translation, utilizing colloquialisms in the foreign language that might be more widely understood by the population of callers to NYC 311. Internal bilingual staff is also utilized to listen to and evaluate IVR recordings that are produced by the vendor using professional voice talents.

DoITT will coordinate a Language Bank of volunteers who are willing to perform quality reviews of translated documents, make recordings for the 311 IVR on an impromptu emergency basis, and assist with correspondence received in languages other than English.

Once the volunteers have been identified, and providing funding is available in the budget, it is DoITT's goal to have each volunteer certified through Language Line's Language Proficiency Testing Process.

The list of volunteers for the Language Bank will be updated monthly to ensure that employees who have left DoITT are removed from the list.

An annual recognition event for the volunteers will be considered (budgets permitting.)

Solicitation for new volunteers will be conducted semi-annually by the agency's Language Bank Liaison.

b. Taking advantage of Citywide resources

As previously stated, DoITT maintains the Citywide contract with Language Line Services.



your city. your needs. your number.