



**The City of New York**  
**BUSINESS INTEGRITY COMMISSION**  
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Elizabeth Cotty  
*Commissioner and Chair*

## **NYC BUSINESS INTEGRITY COMMISSION LANGUAGE ACCESS PLAN**

December 2023

### **I. Agency Name and Agency Language Access Coordinator**

New York City Business Integrity Commission

Language Access Coordinator: Christy Capolongo, Deputy Director of Licensing

### **II. Agency Mission and Background**

#### **a. Mission**

The Business Integrity Commission (BIC) is both a regulatory and law enforcement agency charged with oversight of the private carting industry operating in New York City, the businesses operating in the City's public wholesale markets, and the shipboard gambling industry (although currently inactive). The mission of BIC is to eliminate organized crime and other forms of corruption and criminality from the industries it regulates. BIC's goals are numerous: to ensure that the regulated businesses are able to compete fairly; that the marketplaces remain free from violence, fraud, rackets, and threats; that customers receive fair treatment; and that the businesses approved to operate in these industries are conducting their affairs with honesty and integrity.

BIC issues licenses and registrations to applicants who meet the standards of good character, honesty, and integrity. Through regulation of these businesses by vigorous background checks, auditing, and criminal investigations, BIC carries out its mandate to eliminate organized crime and other forms of corruption and criminality from the industries it regulates.

#### **b. Direct Services**

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

### **III. Agency Language Access Policy and Goals**

BIC has developed its Language Access Plan to guide the agency in serving persons who have Limited English Proficiency (LEP). In keeping with LL 30 of 2017, BIC will provide, to the extent possible, access to services and information to persons with LEP.

BIC remains committed to developing and improving ways to maintain communications with the City's LEP community. In accordance with BIC's language access policy, the agency will:

- Provide training to staff on language access plan procedures;
- Post multi-lingual signage regarding the availability of free telephonic interpretation services;
- Improve the process to identify and track preferred language needs;
- Translate the BIC FYI pamphlet to include additional languages as needed; and
- Provide telephonic interpretation services in at least 100 languages using the language line.

The Language Access Coordinator is responsible for monitoring the effectiveness of the plan by evaluating on a regular basis all requests for language assistance. Staff document all instances of LEP individuals requesting assistance; this information is input into a database which enables the agency to generate reports on types of language and frequency, and aids in identifying documents needing interpretation or translation.

### **IV. Agency Language Access Accomplishments and Progress on Goals from previous LAIP.**

Since the inception of LL 30 in 2017, the agency has implemented various procedures to ensure language access services are available to potential LEP persons including the following:

- Identifying an Agency Language Access Coordinator to develop and coordinate language access services;
- Providing resources to staff to assist LEP persons, such as "I Speak" cards and multilingual posters; and
- Training all frontline staff to properly identify LEP persons and how to use tools to identify their primary language.

BIC will continue to provide annual staff training on the language access policy and procedures and review the LEP customer population for frequency of assistance and additional language needs. New employees will be given a training session on language access policies and procedures. Reminder emails on procedures are also sent to all staff periodically throughout the year.

### **V. LEP Population Assessment**

The following LEP population assessment is based on the Four-Factor Analysis issued by the U.S. Department of Justice. The factors are as follows:

1. The number or proportion of LEP persons in the eligible service population;
2. The frequency with which LEP individuals come into contact with the Agency;
3. The nature and importance of services provided to LEP persons; and
4. The resources available to the Agency and the cost of providing language services.

Factor 1: Number or proportion of LEP persons in the eligible service population.

BIC regulates over 2,000 actively operating licensees and registrants. BIC can interact with or receive complaints from all New York City residents. The 2020 public US census data shows there are approximately 8.8 million New York City residents. According to analysis of Census data provided by the Department of City Planning, 49% of New Yorkers above the age of five, or approximately 3.9 million New Yorkers, speak a language other than English at home.

Factor 2: Frequency with which LEP individuals come into contact with the Agency.

In CY 2021, BIC received 103 requests for language interpretation services. Spanish comprised 71.8 percent of language interpretation services followed by Mandarin (25.2 percent), Korean (1.9 percent) and Pashto (1.0 percent). The language line was used 44 times for language interpretation services while 59 were conducted by multilingual BIC office staff.

In CY 2022, BIC received 99 requests for language interpretation services. Spanish comprised 54.5 percent of language interpretation services followed by Mandarin (33.3 percent) and Cantonese (12.1 percent). The language line was used 65 times for language interpretation services while 34 were conducted by multilingual BIC office staff.

To date in CY 2023, BIC received 118 requests for language interpretation services. Spanish comprised 44.9 percent of language interpretation services followed by Mandarin (31.1 percent), Polish (3.6 percent), Korean (2.7 percent), Punjabi (1.8 percent), Hebrew (1.8 percent), Urdu (1.8 percent), Pashto (1 percent), Turkish (1 percent), (Russian (1 percent), Italian (1 percent), and Bengali (1 percent). The language line was used 107 times for language interpretation services while 11 were conducted by multilingual BIC office staff.

Factor 3: Nature and Importance of services provided to LEP persons.

It is BIC's goal to provide meaningful access to its services and information to LEP New Yorkers. Without the availability of language access services, LEP business owners could feel discouraged about filing required applications, making complaints about unlawful activities or reaching out for basic information. LEP New Yorkers should feel comfortable knowing that they can also make complaints and inquire about basic agency information.

Factor 4: Resources available to the Agency and the cost of providing language services.

BIC had contracted to provide language access services as needed for CY 2021, 2022 and 2023:

Contracted vendor: Language Line (Telephone translation)

Cost for provided services by CY:

- CY 2021: \$422.46
- CY 2022: \$611.92
- CY 2023: \$948.42

Additionally, BIC staff who speak multiple languages may volunteer to engage directly with LEP New Yorkers.

## **VI. Provision of Language Access Services**

### **a. Interpretation Services**

Most of BIC's customer service population contacts the agency through the Licensing unit's reception area and over the phone. BIC's multilingual staff currently handles a significant amount of BIC's interpretation needs. At present, 89.3 percent of BIC's interpretation needs are for Mandarin and Spanish. BIC currently has access to the vendor Language Line to supplement interpretation needs for languages other than Mandarin and Spanish, if so needed. At the same time, BIC will continue to monitor and document language interpretation needs so BIC can identify any additional primary languages of customers.

BIC also includes information on requesting language assistance services at BIC's public hearings in the published notices for public hearings. BIC staff are prepared to provide language assistance services regarding Agency communications.

### **b. Translation of Written Materials**

The essential documents for regulated businesses are the instruction sheets and application forms for private carter and market licenses and regulations. As part of BIC's implementation plan, the instruction sheets to applications have been translated. BIC's website can also be translated into 108 different languages. The agency has access to the vendor Language Line to translate any additional essential documents.

BIC is committed to plain language usage and will continue to work with the Mayor's Office to ensure that all new documents available for distribution to the public meet plain language principals.

### **c. Signage at Public Centers**

Posters informing members of the public of the availability of free language assistance are posted in BIC's reception area. "I Speak" language cards are located at the sign-in counter in the reception area. A welcome sign translated into 10 different languages is posted in BIC's reception area. Since no person is allowed to pass the reception area without escort or assistance, no directional signage is necessary.

### **d. Outreach and Public Awareness of BIC's Language Assistance Services**

BIC conducts community outreach on the agency's language assistance services to individuals through BIC's reception area for the public to evaluate the effectiveness of BIC's language assistance to the LEP population.

## **VII. Training**

- A copy of the new language access plan is available to all BIC staff via the agency's intranet.
- BIC Employees assigned to the licensing center's walk-in area and complaint line personnel are the front-line staff who receive additional in-depth language access training.

- All BIC employees have access to the tools to identify a customer’s primary language, are trained in how to request language services, how to document LEP assistance, and if needed, the use of telephonic interpreters.
- BIC on-site employees who have volunteered their language skills are trained on how to ask questions to identify issues needing answers or clarification, how to provide the correct information, and on interpersonal skills for interacting with LEP individuals.
- BIC will continue to work with MOIA if additional trainings or information is warranted.

### **VIII. Record Keeping and Evaluation**

BIC maintains interactions with LEP persons.

- Requests for interpretations are noted in the Language Line reports (invoices), including Call Detail (language, time, date and duration), and Call Detail Summary Report.
- BIC’s bilingual staff records all interpretations in BIC’s internal database. The data collected includes the staff member who performed the interpretation, the language, the date and the time.
- The LAC will review and evaluate language access data and information annually, including feedback from all frontline and multilingual staff.

### **IX. Resource Analysis and Planning**

BIC developed an internal volunteer language bank. This volunteer language bank will be updated regularly to reflect new volunteers and new languages. The language bank currently offers the following languages: Spanish, Mandarin, Arabic, and Twi.

Contract vendors are available to supplement interpretation and translation needs.

### **X. Outreach and Public Awareness of Language Access Services**

To ensure that the public is aware of the Language Access Services available to LEP persons the agency has implemented the following:

1. BIC has prominently displayed posters stating the availability of free interpretation services at location accessed by the public;
2. BIC’s reception desk has placed the “I Speak” cards front and center;
3. BIC’s website contains the agency’s Language Access plan; and
4. New York City as a whole advertises the availability of interpretation for all LEP persons.

### **XI. Language Access Complaints**

All staff are trained on how to take Language Access complaints. Staff training will focus on utilizing a customer service-based approach. All front-line staff can resolve problems in a manner that allows persons to receive satisfactory requested services. If the front-line staff is unable to resolve the issue immediately, then they will seek assistance from their immediate supervisor. If the issue cannot be resolved at that time, agency staff will inform the person that they can file a complaint either by calling 311 or filling out a complaint form.

The agency LAC will respond to any unresolved complaints promptly. The agency LAC is responsible for the intake of the complaint, tracking, resolving and reporting the complaint to MOIA.

## **XII. Implementation Plan Logistics**

Christy Capolongo, Deputy Director of Licensing, is BIC's Language Access Coordinator.

All staff who interact with the public receive annual training on language access policies and procedures. When possible, BIC utilizes internal staff volunteers to serve LEP persons.

The Language Access plan is currently implemented. The plan can be found here:

<https://www1.nyc.gov/site/bic/about/language-access-plan.page>