



## Language Access Implementation Plan

The Language Access Implementation Plan explains how the agency will provide services to people who have limited English proficiency (or LEP).

**Agency name:** NYC Commission on Human Rights

**Language Access Coordinator name:** Taiwo Onabanjo


**Language Access Coordinator title:** Executive Director of Human Resources

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This Plan includes information about:

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4. <a href="#">Notice of the right to language access services</a>	How the agency notifies the public about their right to language access services
5. <a href="#">Provision of language services</a>	What language services the agency provides
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## Signatures



6/7/2024

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Taiwo Onabanjo, Language Access Coordinator

Date

Executive Director of Human Resources, NYC Commission on Human Rights



6/7/2024

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Annabel Palma

Date

Commissioner & Chair, NYC Commission on Human Rights

## **SECTION 1: AGENCY MISSION AND SERVICES**

The New York City Commission on Human Rights (the “Commission”) is the agency responsible for the enforcement of the New York City Human Rights Law (“City Human Rights Law”), Title 8 of the Administrative Code of the City of New York. The City Human Rights Law is one of the most comprehensive anti-discrimination laws in the country. It includes protections in public accommodations, housing, and employment based on race; religion/creed; color; age; national origin; immigration status; gender; gender identity and expression; height; sexual orientation; pregnancy; disability; uniformed status; weight; and marital or partnership status. Additional protections are included in employment based on arrest or conviction record; status as a victim of domestic violence, stalking, and sex offenses; unemployment status; credit history; salary history; and status as a caregiver. More protections are afforded in housing based on lawful occupation; lawful source of income; status as a victim of domestic violence, stalking, and sex offenses; and the presence of children.

The City Human Rights Law also prohibits retaliation, discriminatory harassment or violence, and bias-based profiling by law enforcement. The Law further requires employers to make reasonable accommodations for disabilities; religious observances or practices; pregnancy, childbirth, or related medical conditions; and for victims of domestic violence, stalking or sex offenses. Housing providers and public accommodations are also required to make reasonable accommodations for people with disabilities.

To carry out the agency’s mandate, the Commission has three primary divisions – the Law Enforcement Bureau (“LEB”), Community Relations Bureau (“CRB”), and the Office of the Chair. LEB is responsible for the intake, investigation, and prosecution of City Human Rights Law violations, including those that raise systemic violations. LEB offers the option of resolving claims through pre-complaint interventions in lieu of filing a complaint, leading to a quicker resolution. Our enforcement bureau also proactively uses testing to investigate whether entities have engaged in discrimination. Agency staff may conduct testing in person, on the telephone, or online to see if certain protected categories are treated differently or are given different information. Lastly, our Infoline call center is housed within LEB. New Yorkers who feel they may have been discriminated or harassed can call us directly to schedule an intake appointment.

Through borough-based offices, CRB helps to cultivate understanding and respect among the City’s diverse communities through outreach workshops, and training sessions among other initiatives. Many of these efforts are executed in collaboration with different advocacy organizations, sibling agencies and community stakeholders on outreach strategies for groups/different individuals raising claim under NYCHRL.

The Office of the Chair houses the legislative, policy, and adjudicatory functions of the Commission, engages with stakeholders on policy issues, and convenes meetings with the agency’s commissioners. The Office of the Chair houses the agency’s communications and

marketing efforts, which leads multi-media campaigns to raise awareness of the rights and obligations of New Yorkers under the City Human Rights Law.

The Commission's Office of Mediation and Conflict Resolution offers parties a voluntary mediation program at no cost. It is confidential and available at any stage of a case.

Members of the public who believe they have been the subject of unlawful discrimination in New York City can visit the Commission in one of its offices located in the five boroughs, contact the Commission by calling 311, call the Commission directly at (212) 416-0197, or contact the agency via its website.

The Commission continues its track record of hiring staff with diverse and varied backgrounds, and the ability to speak an array of languages. Most staff are based in the Manhattan office (22 Reade Street), which is where LEB and the Office of the Chair are located.

## **SECTION 2: AGENCY LANGUAGE ACCESS POLICY AND GOALS**

The NYC Commission on Human Rights (The Commission) is committed to provide meaningful and accessible language access to information and services. The design and implementation of the Commission's Language Access Policy is one element of this commitment. Throughout the tenure of Commissioner and Chair Annabel Palma, the Commission has been committed to making its services accessible to all New Yorkers, with a particular focus on improving access for limited English proficient ("LEP") New Yorkers and standardizing the use of language access practices throughout the agency. Language accessibility in tandem with disability accessibility are central to the agency's mission.

As a result, the Commission has been able to fulfill the goal of providing quality support for all people who seek our services, regardless of the language they speak. The Commission recognizes that inclusive and accessible communication is key to building trust in historically underserved communities, including immigrant and non-English speaking communities. The Commission consistently communicates to current and new staff that language access is one of the core priorities of the agency, and to that end requires all staff to be trained in Language Access procedures annually. Our external communications, including written materials and social media campaigns are multilingual, and we intentionally collaborate with community and ethnic media to reach a wide array of New Yorkers in their preferred languages.

With over 25 languages spoken in-house, the Commission prides itself on hiring efforts that ensure a multi-ethnic, multi-racial, multi-lingual staff that represents the diversity of New York City. When we are unable to translate into a language requested by a constituent, the agency works with qualified vendors to provide accurate and timely translations during intakes, interviews, and meetings.

The Agency Language Access Policy will be reviewed and revised periodically to ensure continued alignment with Commission goals and policies and meets the evolving needs of New Yorkers.

### SECTION 3: LANGUAGE ACCESS NEEDS ASSESSMENT

**Factor 1** examines the number or proportion of LEP persons eligible to be served or likely to be encountered by the program. The Commission's service area includes all of New York City.

According to the U.S. Census Bureau's most recently available data, which is from 2022, residents who live in the New York area who speak English less than "very well" are most likely to speak: Spanish, Chinese, Russian, Bengali, Yiddish, Haitian Creole, Korean, Arabic, French and Polish.<sup>1</sup>

**Factor 2** analyzes the frequency with which LEP individuals come in contact with the Commission.

The Commission's case tracking system allows staff to flag the need for interpretation and translation for everyone who contacts LEB through the Commission's Infoline to ensure appropriate language services throughout the life of a case, regardless of whether the case is transferred among different staff members. From the beginning of July 2022 to the end of June 2023, the Commission fulfilled 920 requests for interpretation through multilingual staff and the use of LM Language Services, with which the Commission has a contract for interpretation. The Commission maintains this information, organized by language, and uses the information to inform staffing, translation, and interpretation priorities.

The top three languages in which the agency received inquiries other than English were Spanish, Russian, and Mandarin. These languages, as well as the other languages mandated by Local Law 30, are all included in the Commission's language access policies. Based on our data, we believe that the ten languages mandated by Local Law 30 cover an overwhelming majority of our needs and all other translation is, and will be, performed on a case-by-case basis.

The Community Relations Bureau participated in 2,172 events in Fiscal Year (FY) 2023, reaching 132,507 individuals. Nearly 20% of outreaches (which include workshops, tabling, etc.) were in languages other than English.

225 outreaches (were conducted in the following languages: Arabic, Bengali, Chinese (Mandarin, Cantonese), French, Hindi, Russian, Spanish and Urdu. These events were attended by 24,396 people during FY23.

**Factor 3** describes and assesses the importance of the benefit, service, information, or encounter to the limited English proficient person.

The Commission recognizes that our services and information are crucial for individuals with limited English proficiency because they provide essential support navigating legal, social and economic systems that can otherwise seem inaccessible. By offering translation, interpreters, and clear multilingual information, the Commission helps bridge language barriers, promoting

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<sup>1</sup>

<https://data.census.gov/table/ACSDT5Y2022.B16001?q=languages%20spoken%20at%20home&g=040XX00US36>

inclusivity, equity, and justice. This empowers individuals, fostering a more harmonious, informed community where everyone, regardless of linguistic background, can thrive and feel protected. The Commission's goal is that all people who seek our services, regardless of the language they speak, are treated with dignity and respect, and are afforded meaningful access to services.

This plan, like previous CCHR plans, reflects the Commission's commitment to providing language access services and meeting the following goals:

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- To ensure that language is not a barrier to services provided by the Commission;
  - To ensure that everyone has equal access to our services and materials, regardless of the level of their English proficiency;
  - To inform all individuals seeking our services that free interpretation services are always available;
  - To improve data collection systems to track LEP individuals seeking the Commission's services; and
  - To train front-line staff on the importance of ensuring access to free interpretation services for all LEP individuals.

**Factor 4** describes the resources available to the agency and the costs of providing various types of language services.

The Commission uses multilingual staff and vendor services including translation, telephonic interpretation, and, when appropriate, on-site interpretation to speak with clients in their preferred language.

The Commission plans to procure interpretation equipment as well as computer-assisted translation tools, to streamline translation requests, improve consistency, quality, and turnaround times of translated materials. Additionally, we are proud that our staff who engage directly with LEP individuals speak over 25 languages.

#### **SECTION 4: NOTICE OF THE RIGHT TO LANGUAGE ACCESS SERVICES**

At the Commission of Human Rights, we are committed to ensuring that all New Yorkers have equal access to services and information. To ensure that the public is well-informed about the availability of language access services and their rights to these services, the Commission has implemented a comprehensive communication strategy. This strategy includes the production and posting of multilingual signage prominently displayed in all of our offices. These signs are placed in our reception areas as they are the most visible and utilized by members of the public. Current signage includes information about individual rights to translation services and the many languages we offer. Additionally, our website can be translated in multiple languages and provides information about our translation services. Our website also hosts all of our

campaigns detailing the number of protections covered under the Human Rights Law. Our campaigns are all translated in multiple languages. Also, our social media platforms feature multilingual notifications and feature our campaigns which are also translated in an array of languages.

Lastly, as part of the Commission's outreach strategy, we distribute flyers, brochures and posters in multiple languages at public spaces such as libraries, community centers, and places of worship to raise awareness of the Human Rights Law. We make sure to specify that translation services are available at all outreach events.

By providing proper signage and notifications, the Commission emphasizes dedication to the inclusivity and the provision of equitable services to all New Yorkers, regardless of the language(s) spoken.

## **SECTION 5: PROVISION OF LANGUAGE ACCESS SERVICES**

### **Interpretation & Translation**

The Commission's Law Enforcement Bureau continues to interact with members of the public by phone, virtually, and face to-face. A member of the public will generally contact LEB by calling 311 or by calling the Commission's Infoline directly, but the agency can also be reached via the Commission website. LEB's Infoline staff conducts initial phone assessment in four languages (Spanish, Hindi, Urdu, or Nepali) through in-house capacity. If the individual speaks a language other than those identified, Infoline staff immediately calls a phone interpreter through the Commission's vendor, LM Language Services. If an appointment is made for the individual to meet with an attorney, supervisors who assign intakes attempt to assign an attorney who speaks that language for the interview and if no staff with the requisite language skills is available, the attorney will use phone interpretation by LM Language Services during the interview.

Intake forms are currently translated into Spanish, which is, by a large margin, the most commonly used language by members of the public accessing LEB's services after English. Nearly 1/3 of all LEB staff speak and read in Spanish and can therefore review the form directly without need for translation. For all other languages, when the individual arrives for an intake appointment, the attorney or other staff member who speaks the person's language meets with them to verbally translate the form, fill out the form in English, and then proceed with the intake. If no staff members speak the person's language, then the staff member performs the same function with assistance of an interpreter by phone through LM Language Services, or in some instances, with a professional in-person interpreter the Commission has hired for the appointment.

The Commission's Law Enforcement Bureau has translated fifteen commonly distributed documents into ten designated languages. These documents are defined as those that are regularly sent to parties in the investigation, enforcement, and mediation processes. As the

Commission develops new print and web materials for large-scale distribution, it has continued to use a certified outside vendor to translate materials. Once documents have been translated by an outside vendor, the Commission identifies staff internally or through the Volunteer Language Bank to review the accuracy of translation before they are made available to the public. All of our materials are offered on our website and in print by request. Additionally, these commonly distributed documents have been reviewed to ensure they use plain language. Units will integrate plain language review into the workflow for all new document creation, to ensure that ease of translation and accessibility in English and in other languages.

For outreach events, public hearings, or trainings, the Commission accommodates any interpretation requests using portable simultaneous interpretation headset equipment owned by the Commission. CRB provides invitations to events in multiple languages and notes on the invitation on how one may request language interpretation. The Commission continues to make outreach and public awareness of the Commission's services and expanded language capacity an integral part of its work and collaborates with the offices of local elected officials and community-based organizations to have intake events, and days of outreach and visibility. Many of the Commission's presentations are also given in, or interpreted into, Spanish, Russian, French, Mandarin, Haitian Creole, Bengali, Hindi, Arabic, and/or American Sign Language by Commission staff. The Commission also displays signage and literature in multiple languages at the Commission's Community Service Centers advising members of the public of their right to free interpretation.

The Commission makes every effort to conduct key events in-language for key audiences. We also routinely make language interpretation available at community events, town halls, and public hearings. The Commission consistently shares information about our services and other work in a number of languages including in Local Law 30 languages.

To further the Commission's accessibility to diverse language speakers, the Commission's Office of Communications and Marketing has maintained a record of ensuring that all campaigns and advertainments are offered in multiple languages for key audiences.

Outreach to non-English speakers remains a priority for Commission announcements and public education campaigns. The Commission will continue its longstanding relationship with community and ethnic media outlets and organizations for key event partnerships. In recent months, the Commission has held a media roundtable in Spanish, and launched multi-lingual campaigns.

## **Digital Communication**

The Commission continues to leverage social media, digital platforms, and community press to expand our reach. Campaigns such as "Vouchers Pay. Discrimination Doesn't" raising awareness of source of income discrimination; and "Display the Pay," which alerted New Yorkers to the expansive suite of protections for job seekers and informed New Yorkers of their rights and responsibilities under the salary transparency provision that went into effect in



November of 2022. Our multilingual campaigns span social media, radio, print outlets, and convenience stores. We also developed a series of short videos known as the “Human Rights Minute.” These videos aim to make the Human Rights Law and the work of the Commission more accessible to New Yorkers and are widely shared via our media channels.

Media and press outreach are a means to elevate the Commission’s outreach, trainings, events, and enforcement actions. The Commission continues to invest in community and ethnic media through print advertising and ensures all campaigns are translated in multiple languages. We also ensure plain language is used for accessibility.

The Commission will work with the agency’s Language Access Coordinator to enhance the overall accessibility of our communications, including through multiple language media, alt-text, closed captions, and engagement with ethnic media.

## **Emergency Communication**

To effectively address language access needs in both preparation and response phases of an emergency, the Commission will implement a comprehensive plan to identify and communicate with communities with LEP needs. This strategy will begin with a thorough analysis of our services that can be offered during an emergency and community engagement efforts that can help reach the public and those affected by the emergency. During times of emergency, leveraging our relationships with community partners will be crucial, as these CBOs can provide nuanced understanding and facilitate communication with otherwise hard-to-reach populations.

Our language access coordinator will be responsible for liaising with the COOP plan team.

In an emergency, the Commission may need to reschedule appointments or close down offices. It will be vital to communicate our processes in a timely manner and in the appropriate languages. Our Communications team will activate a multilingual communication task force equipped to deliver real-time information in various languages through multiple platforms, including social media, radio, television, and community networks. The plan will include pre-translated materials for anticipated scenarios, alongside on-the-fly translation services for real-time updates. The majority of our campaigns and promotional materials are translated in the 10 designated languages required on all of our platforms. However, with our grassroots approach to outreach, we have identified smaller communities that require translations in other languages outside of the required 10. The Commission currently uses 3 language translation services, all who are able to do quick turnaround translations in various languages.

Continuous assessment and feedback loops will be integrated to adapt and refine communication strategies in real-time, ensuring no community member is left without vital information during emergencies.

The Commission does not issue licenses, permits or registration as stated in LL30, (§) 23-1102b (12)(i).

## SECTION 6: RESOURCE PLANNING

- A. Multilingual Staff: The Commission recognizes the importance of hiring multilingual staff to better serve and understand the cultural nuances of immigrant communities. Roughly half of New Yorkers speak a language other than English at home and having multilingual staff that can understand and translate on demand is crucial for our agency.

The Commission is proud that as a result of our inclusive and diverse hiring process, our staff of over 100 speak over 25 languages.

- B. Language Service Vendor Contracts: The Commission has consistently utilized the resources discussed previously, as well as using any other resources that become known or available, in order to assure continued improvement in the quality of the interpretation and translation services provided. The Commission is committed to full compliance with Local Law 30 and will continue to prioritize the hiring of individuals with existing contacts and relationships with communities that have historically been under-served by government, including certain LEP communities, and will prioritize the hiring of individuals that have the skills to increase the Commission's language capacity and cultural competency.

The Commission has procured through the MWBE solicitation process the following vendors for the FY23 fiscal year: B&N Interpreting, LM Language Services, Langalo and Accurate.

LANGUAGE ACCESS FY23 VENDOR			
TYPE OF SERVICE	VENDOR	AMOUNT	LANGUAGES
Professional Vendor for Translations	Langalo, Accurate	\$18,204	Over 60 languages
Over the Phone interpretations	LM Language Services	\$8,346	Spanish, German, French, Italian, Russian, Chinese (Simplified and Traditional) and others.
In-person (virtual) interpretation	B&N Legal Interpreting	\$5,250	Over 200 languages
	<b>GRAND TOTAL</b>	<b>\$31,800</b>	

C: Partnerships with CBO's: The Commission's Community Relation Bureau has been working to increase its outreach to various immigrant communities throughout the city and partners with community-based organizations, houses of worship, sister agencies, local elected officials, and others to expand the Commission's reach and connect with immigrant and LEP communities. The Commission has also made available all of its latest major agency publications in ten languages other than English. These publications are available for download on the Commission website and in print on demand. The Commission has also use "I speak" cards that inform New Yorkers about interpretation services.

The Commission has also continued its ongoing efforts and investment in New York City's diverse community media outlets and has been persistent with outreach and advertising placements in media, when needed, most relevant to the communities the Commission serves. The Commission has kept an open dialogue with some of our city's most vulnerable and hard-to reach communities and has continued to produce advertisements in various languages to be placed in ethnic print media, including Arabic, Bengali, Spanish, Chinese, Korean, and Urdu. The Commission will continue to focus its advertising budget on community and ethnic media in multiple languages. In addition, like other City agencies, the Commission maintains its website in a manner that allows for direct translation into numerous languages other than English.

## **SECTION 7: TRAINING**

The Commission requires that all staff receive regular training on language access and how to provide appropriate services to LEP members of the public who are accessing the Commission's services. The Commission will continue to train all staff as to all facets of this policy and its implementation on an annual basis and all newly hired staff will be trained on this policy during the on-boarding process. Topics of the training will include: the protocol for use of bilingual staff; the procedure for providing or arranging for the provision of interpretation services; means of identifying a LEP individual's primary language; the use of LM Language Services phone interpretation services; and cultural competency for working with LEP individuals. The training is, and will continue to be, conducted by the Managing Director for Education and Compliance and is regularly updated with approval from the agency's Language Access Coordinator.

## **SECTION 8: CONTINUOUS IMPROVEMENT**

### **A. Data Collection:**

The Commission tracks requests for both interpretation services and translations through LEB's case-tracking system (Microsoft Dynamics) and has added this capacity to track trainings and outreach by CRB. The Commission has also developed and implemented means for evaluating the quality of the services it provides to LEP individuals. This includes seeking feedback from LEP individuals as to their level of satisfaction with the services they have received through evaluation forms and/or surveys after trainings, presentations, and meetings.

Commission staff have also received feedback on the accuracy and effectiveness of interpretation and translation services, particularly at Commission-led events or initiatives, from our community partnerships with houses of worship, advocacy groups, and community organizations that serve a wide range of LEP populations across the city. The Commission's Annual Report also includes a breakdown of inquiries to our Infoline by members of the public whose preferred language is not English, with Spanish maintaining its position as the most requested language. The Commission's Language Access Coordinator, in partnership with staff in all departments, has been monitoring the efficacy of this plan and compliance with Local Law 30.

The Commission will continue to monitor and assess the feedback provided on translation services to help identify gaps and improve service to New Yorkers.

### **Language Access Complaints**

The Commission's Language Access Coordinator monitors all complaints related to language access submitted through 311 or made internally and is responsible for receiving, tracking, and resolving complaints. In addition to complaints, questions, or requests made through 311 or directly to our staff during Commission programming, members of the public can email our team directly at [Languageaccess@cchr.nyc.gov](mailto:Languageaccess@cchr.nyc.gov). This email can be found on our website in the same section as our Language Access Plan.

## **SECTION 9: GOALS AND ACTION PLANNING**

The Commission has consistently utilized the resources discussed in this report, as well as using other resources that become known or available, to assure continued improvement in the quality of the interpretation and translation services provided. The Commission is committed to full compliance with Local Law 30 and will continue to prioritize efforts to ensure that our services are known and accessible to LEP communities. To that end, the Language Access Coordinator, Taiwo Onabanjo, will oversee the implementation of this plan, as well as monitor its effectiveness.

The Language Access Coordinator will review the Plan at least annually, and modify it as needed. The Commission will continue to:

Goal	Milestone/Action Steps	Stakeholder	Timeline
Train all staff on the updated Language Access Plan and cultural competency in working with LEP individuals	<ul style="list-style-type: none"> <li>Re-evaluate current training</li> <li>Schedule training</li> </ul>	All staff	Trainings occur 1x a year.
Prioritize the hiring of staff to increase internal language capacity to reflect the	<ul style="list-style-type: none"> <li>Review JVN's to include knowing another language as a preferred skill</li> </ul>	Hiring Committee,	Ongoing

Commission's service population	<ul style="list-style-type: none"> <li>Enhance recruitment strategies</li> </ul>	HR, Leadership	
Ensure social media content is consistently published in languages in addition to English	<ul style="list-style-type: none"> <li>Identify target languages</li> <li>Translate publishing's inhouse when possible</li> <li>Create content calendar</li> </ul>	Comms Team	Ongoing
Develop trainings and presentations in Spanish, Russian, French, Mandarin, and Haitian Creole, and other additional languages;	<ul style="list-style-type: none"> <li>Create and update presentations</li> <li>Translate presentations using vendor or inhouse</li> <li>Review &amp; present to leadership for approval</li> </ul>	CRB, LEB. Policy	June 2026
Perform strategic outreach to ethnic media that serve LEP communities in the five boroughs in the form of advertisement, press stories, and panel discussions with reporters and editors working at these media outlets	<ul style="list-style-type: none"> <li>Review internal data to understand needs and gaps</li> <li>Meet with ethnic media representatives</li> <li>Create plan</li> <li>Present to Commissioner for approval</li> </ul>	Comms Team	June 2025
Create citywide media campaigns with components translated into languages other than English	<ul style="list-style-type: none"> <li>Review CCHR's guidelines on multi-language media</li> <li>Receive feedback from Commissioner to determine priority subjects for campaign</li> <li>Receive approval</li> <li>Identify potential vendors to use for translations</li> </ul>	Comms Team	June 2025
Plan outreach events to LEP communities.	<ul style="list-style-type: none"> <li>Identify potential partnerships in the LEP communities</li> <li>Create strategy and schedule of events</li> </ul>	CRB	June 2026

	<ul style="list-style-type: none"> <li>• Identify and train staff that will be working in these communities</li> <li>• Execute event and evaluate success</li> </ul>		
Translate major Commission materials into at least ten languages in addition to English;	<ul style="list-style-type: none"> <li>• Identify most commonly used legal and outreach materials that have not yet been translated.</li> </ul>	CRB and LEB	Ongoing