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>>  I will call to order the Civil Engagement Commission's first public hearing focused on language assistance programs. Welcome everyone ‑‑ including anyone participating in the live stream. Thank you for taking the time to be with us today. For you in the audience, if you haven't yet, please add your name to the sign in sheet and there should be a signature sheet for the Commissioners as well. Please sign it when you get it. May I first have the press room attendance please connect with the director of communication and governmental affairs. We are being live streamed ‑‑ we also have live captioning and interpreters that will provide translation in Spanish, Chinese, French or Creole today. If you would like interpretation and have not already received the device, please make the request at the check in table outside. I want to thank all of the interpreters for being here. Are there any individuals that have not signed up to speak but would like to offer a comment up to minutes long?  Anyone that wants to testify can sign up at the table until 6 P.M. As a reminder, the purpose of today ‑‑ the hearing today is to hear from the public on the civic engagement proposed methodology for language assistance. It provides a strategy to determine the languages to be served by this program. The commission was required to make this proposal public by January 1, to open a 30-day comment period and to hold a public hearing to get the public's feedback and possible revisions to the methodology. The commission comments period is open until March first by email or on the online forum on the commission website. All comments will be considered during the revision of the methodology and the final will be published by April 1 and administrated by the 2020 general election. Before I ask the civic engagement commissioner to introduce themselves, I want to acknowledge some people key to being here in this moment ‑‑ the commission staff that helped on make the event today, members of the language advisory committee and you are not here thank you. Key partners that have been very much a part of the thinking and analysis that informed this strategy ‑‑ from the market that has the charter requirements ‑‑ the population of the department of city planning and he Commissioner from the mayor's office of immigrant affairs.  They have been supporting language and helped agencies with guidance and support to help the languages diversity of New York City. The way it has been running for the interpretation throughout the city for 3 years and they will continue to provide language assistance through the upcoming special elections in March, April and June. Beginning in November 2020, as required by the charter, the engagement commission will assume the operation of the language assistance program.

The comments that we take from you today will be used to revise the civic engagement commissions that will be implemented in November. So, I would like to now ask the Commissioners to introduce themselves.  I realize I didn't introduce myself I am Sarah Sayeed the chair and executive director.

>>  Hi. I am Chuck Apelian. I am representing the borough of Queens.

>>  Good afternoon I am Mark Diller representing the borough of Manhattan.

>>  Hi with the spring communities services Linda Lee.

>>  Commissioner Holly representing Staten Island.

>>  I am Anastasia Somoza. I am the Brooklyn borough representative.

>>  I am Donna Gill. From central Harlem ‑‑ still in Manhattan.

>>  I am Lillian Perez representing the Bronx borough Commissioner.

>>  Good afternoon I am Murad Awawdeh ‑‑ from Brooklyn ‑‑ the executive vice president at New York.

>>  Thank you to all the Commissioners. Just as a reminder if you walked in late and would like to testify and have not signed up yet, please sign up in at the welcome table in the back. We will keep the sign-up period open until 6 P.M. so hopefully we will have you sign up and look forward to hearing from you. So, as we prepare to open for the public's comments, I wanted to go over the program and how we will run the hearing today. We will have a brief presentation and overview of the methodology from the commissioner advisor on language access and community boards. After that, we will go into the comments period and each commenter will have 3 minutes to offer their comment. We will be running a timer to help us stay on track. After the commenter finishes, the Commissioners will have the opportunity to ask 2 to 3 clarifying questions. I will not go over 3 questions. These are just questions we will ask by the person in comment. We will not discuss the comments until all of them have been completed and received. If the Commissioners don't have questions, I may turn to the staff who have been working on the proposal methodology to see if they have questions as well. Do any Commissioners have comments on the process we explained?  I will ask to begin the presentation and you need the power point for that ‑‑ correct?

>>  Yes.

>>  Hi. I am Gagan Kaur ‑‑ an advisor for language access. We are grateful to have you all join us to be part of review and public feedback portion of proposed methodology. We will run through the civic engagement commissions proposed methodology for the resistance program by the New York engagement program is mandated  to consider a few factors for the language assistance program. These factors include but are not limited to relevant date, locations of poll sites and election districts, information related to voter turnout and any other information deemed appropriate. This outlines how the commission will determine with limited English proficiency of the city-wide languages. This is defined by the ten most commonly spoken city-wide languages and is routed in 2017.

>>  So, the New York City charter specifies how to choose program languages. We are mandated to prioritize city wide languages spoken by 85 percent of New Yorkers coming from the 2018 American community survey ‑‑ the languages are Spanish, Chinese, Russian, Creole, Arabic, Polish and French. The commission may also consider adding another language if the number of speakers with limited English proficiency is greater than the number of individuals who speak the lowest ranked city-wide language. Right?  So the first step is prioritizing city wide languages, adding another one if the number of people that speak with limited English proficiency is greater than the number city wide by the third thing city mandates, we consider is we don't provide language assistance in areas where the New York City elections already provides services in. The data in CEC is using in the proposed methodology is the American survey and the American community survey 5-year estimates. And let's define American community survey ‑‑ an annual survey gathering social communities. The final methodology that will be published will just use the most recent 5-year date that was not accessible at the time it was published. Let's go through a couple of data sets to consider what we are getting ‑‑ the first is the U.S. Census bureau. We will be using this for the 5-year methodology because it gives us information to citizenship, languages, English proficiency and ages. The information we are missing is whether the individuals are registered to vote. We gather that information from the New York City board of elections and the 2 later sets are what we were asked to gather the data. It only gives us information which we gather from the aces data along with the ‑‑ so step one in the methodology is to identify program eligible languages. The civic data ‑‑ so the table that you see here ‑‑ at the  languages listed in the blue are either designated city wide languages or ‑‑ per charter ‑‑ we can determine in ACS and you can see that Yiddish is a nondesignate, and we are providing services in Yiddish because the number of speakers is greater than the LEP in New York. We would like one to have a concentration with limited ‑‑ the total number of LEP New Yorkers as you can see on the right is the total number of New Yorkers with English limited proficiency in counties that are eligible for services by the New York City board of elections. You may be looking at Chinese and wondering why the number is low because we exclude individuals getting services in Queens for example.

Step 2 ‑‑ actually just let me remind everyone. What counties ‑‑ the board of elections provide services for languages. Which is also share indeed the propose methodology. As heard in the voting rights act, the board of elections must provide services in the following areas ‑‑ Spanish and Chinese in New York or Manhattan, Spanish and Chinese in Kings County or Brooklyn, coverage of Spanish in Bronx and Staten Island. Spanish is covered in all 5 counties by the New York City board of elections and excluded in the analysis because the commission may not duplicate any services that the board of elections provides services to already. Once we have done that ‑‑ the first chart looked at the total number of New Yorkers with English proficiency ‑‑ the second table looks at New Yorkers with limited English proficiency that are citizens 18 plus and eligible voters. The number goes down from table one to table 2. The next step in the methodology is to determine the total number of site to be served for the eligible services. The reasoning for using this approach is to be consistent with the cities policy of practice to serve individuals in designated wide languages and to promote inclusivity and provide services in more languages. Also, it is an effective deployment ‑‑ so for example if where he able to provide services at a hundred sites, Russian has 89, 600 speakers with limited English proficiency of voting age. That number is ‑‑ sorry one second. I am trying to go get used to the interpretation as well ‑‑ Russian we have 89, 600 out of the total number of voter that are of age.

So, because Russian ‑‑ has 42 percent of the total 100t‑ is allocated 42 sites out of 100 in this hypothetical. Again, this is like just to demonstrate the approach per language. Going down ‑‑ Haitian Creole ‑‑ 29, 200 out of the total citizens of voting age at 14 percent so 14 out of 100 sites.

Step 4 ‑‑ so, this actually ‑‑ it is I am going to read through it but be patient with me because we have visuals after. For step 4 ‑‑ the first step is to determine the citizen voting age, limited English concentrations in the areas at poll sites. So, looking up poll sites and seeing where the New Yorkers are with limited English proficiency of voting ages then we looked at each poll site ‑‑ for Russian go from the highest concentration and keep going down until we hit that 42 number. Then step 3 ‑‑ select poll sites with the highest concentration until the proposition is met ‑‑ for that language. What if had the 42 one doesn't have a significant concentration of limited proficiency English speakers. In that case, consider allocating a different language with greater need. We may allocate that site to whatever site has the next highest concentration. And you can see how we overlay the 2 data sets. Here you can see this is Russian limited English proficiency ‑‑ you see the size of like a neighborhood have the deeper red is where the highest concentration of Russian speakers where eligible voters live then orange then yellow is the lowest. Southern Brooklyn is the highest. After we overlay with the whole site level data. So we take the concentrations for individuals with limited English eligible voter to then rank the top 42 in order highest concentration sites for Russians, so in our proposed methodology, based on the 2017 data that we used, these are the program eligible languages ‑‑ Arabic, Bengali, pretty much, Creole, Korean, pole etc. These may shift as we provide the final methodology in 2020. We are publishing the final methodology April 1 ‑‑ taking into all the public comments that you are sharing with us today. If you have any questions on the presentation, you can ask after the hearing. Just finds me. Thank you so much.

>>  Thank you.

>>  Thank you for taking us through that presentation. So now I am going to ‑‑ open up the floor for people to have all for comments to methodology, and we are going to first call on if you say you need to do ‑‑ I would like to call on the CEO and executive director of community services to come up and offer a comment.

>>  Just turn on the microphone when you speak.

>>  Hello. Good evening everyone. I am the CEO of the community center and day care center. I am also a member of the community board, copresident of the association. I want to applaud the engagement poll sites to help limited language proficient boarders with litigating the voting process and the chair of the New York City civil engagement commissions for creating this opportunity for testimony on poll site language assistance program. The Brooklyn community center is the only Muslim center in this area. They have the languages to be able to communication and understand the Muslim population. They have applied for and received federal state and city documents for the neighborhood. The Brooklyn neighborhood of brighten beech and Cony Island is a very diverse population ‑‑ often times they are not native English speaker and have a hard time makes communication. We help to bridge the gap to fulfill life. Apna miss is to bridge the gap to communities, education and empowerments. We are the second largest religion in the United States as of 2015. Many people believe all of Muslim Americans are immigrants. More than 40 percent are born here. What is not true is where he not all Arabs. About 41 percent white, 28 percent Asian and 20 percent are black. Throughout history, New York City has been a major point of location for immigrants. 800 languages are spoken in New York. English remains the most widely spoken but there are areas in outer boroughs where 25 percent of people speak English as a second language. According in the United States survey, there are many Asian Indians, 41,000 Pakistani, but it should also be noted that this is the form the hard to find communities. Having interpreters will help them especially the seniors take part of the election process. Currently the majority will register to vote but can't see or read the ballot and will not participate in the election. This will help the family members in the election date. It is important that interpreters be presents at the polling site and be advertised to the various media platforms before the election, prior to the election days. This will increase turn out and help the immigrant population for what they are ‑‑ citizens of New York City. Thank you very much.

>>  Are there clarifying questions for her?

>>  The next person that will speak is a member of the community services.

>>  I am the member of neighborhood advisor board 15. Thank you to the New York City city engagement commission for today ‑‑ creating a poll site language assist program. I have been working with the community center for years now. There is no better place like it. Every time I come to the center, I feel like home. The centers for everyone not just the elders of the community ‑‑ they have clothing drives as a way of giving back to the community at the schools at the center. The center talking to the members and helping activities for the elder. We have so many diversity, accessibility for all. Many parts of New York are full of immigrant communities and working-class period. A lot of immigrant families are not participating because of language barrier. There is only a hand full ‑‑ if we have a translator, the numbers they will be able to understand what they are doing ‑‑ the language assistant program will make it easier for the voters and people to come out of comfort zone. The this is especially beneficial for seniors. Thank you New York civic engagement commission for the dedication to these issues.

>>  Thank you for your testimony. Are the languages that you saw in the presentation sufficient?  Or are there languages you would proposal we consider achieving the goals the testimony encourages to achieve.

>>  You do the different language for like Chinese but for my community and behalf on my communities, I am speaking.

>>  So, yours is on the list. Okay. Thank you very much.

>>  Do you think this was very good?  Hold on come back. This was excellent. Speaking of your community, I noticed that you indicated that children would have to go to whole site with an adult to do the interpretation. Now are you aware that the board of elections allows anyone to go in with the person to interpret for them so I think that needs to be said or broad cast to the community so that if interpretation is not available, at least they can take another adult with them to the poll site.

>>  Can I ask answer this?  I agree that the seniors can tame anyone with them for interpretation but often times the voting day is when another adult of the family is busy in school or college so in that case, the seniors have no option. They can't go alone so if the turn out on the voting site will increase.

>>  Okay. Thank you.

>>  Anyone else?

>>  You mentioned, Lilliam, a bit about the font size of some of the paperwork that we have out in the polling sites. I myself and legally blind so I understand that. That is an issue I have had as a New York City voter for a long time. Do you feel the population in your community with font size and vision issues are only age related or do you think that there is another factor that is besides the fonts size?

>>  One is age related. In the last elections, I have been a poll watcher and I encourage my community members to go. First is the seniors ‑‑ it is difficult to read then mark appropriate circle and on top of that, appearing in English language so the seniors don't know because the same are English, they can't read. They can't do anything so we to have been tell them this is the name written, this is the council man, this is the judge, this is the public attorney ‑‑ so the language on the paper as well as the font size because if they are circling so small, they are seniors. Hands are shaky rather than circling the appropriate box they do the other side so the vote will not get counted if it is for 2 individuals ‑‑ obviously that will not count.

>>  Thank you.

>>  We have received a maximize of 3 questions on that comment. So, thank you again ‑‑ for joining us today. The next person up is Jerry from the Asian American legal defense fund. I would like to acknowledge other colleagues here from the Census I believe are outside ‑‑ also, I want to thank colleagues from the New York Board of Elections also for being here with us today. Thank you. Is Jerry here?  Okay. Ralph ‑‑ member of the Life of Hope Center ‑‑ are you here?  Okay. Diaby ‑‑ Chuck park. Are you here?  Amy Torres‑‑ from the Chinese American council?

>>  I wasn't sure ‑‑ hi. Thank you. I am Amy Torres ‑‑ I am the director of the Chinese American policy council. We are the largest social services for Asian Americans in the country, but we are just in New York City. We serve over 60,000 low income and immigrant community members every year including education, economic empowerment. In addition to the services, we provide civic engagement and advocacy for inclusion in many great things like the methodology work here today. CBC is here because Asian Americans face very specific problems with voter problems and turn out. We are limited on time so to share quickly the language access issues ‑‑ CBC serves communities at many different intersections and poverty. Poverty is a large predictor of limited English for Asian Americans and Pacific islanders. While that is part of the community we are working with, we also recognize this community is eligible to vote at higher rates but issues like language access, access to legal services prevent the group from naturalizing then once we do then turning out to vote. We were pleased to comment on today's plan ‑‑ the pace at which we have issued recommendations and prioritized language access is important to us, and we acknowledge and appreciate that. We have 5 recommendations to share ‑‑ expanding the source to select eligible languages, include noncitizens and New Yorkers over 15, reexamining the coverage in voting and providing mechanisms to cover the language at their site. I will pass around my testimony because it is long.  The source data we were happy to see is that ACS was used but the publication sometimes lags, and a number of my colleagues are testifying that the city budget process, from the time from implementation to the publication of that can be quite long. We were a strong advocate for the city's plan to introduction 551, a mandate that the report for the language access and ethnic subgroups would like to see the commission consider that data as part of the expansion of the language program ‑‑ those laws require annual reporting of the data. So, it is voluntarily submitted, but it is more updated and can enhance and fill in the gaps from the ACS data. We also recommend a decrease on relying on the turn outs because of reasons in the testimony. It is often language access preventing the language turn outs. We would like to see an overinvestment because of the untapped potential we are not seeing because of the limited English rated in our communities. We recommend against the reliance on surnames ‑‑ many of us are from countries with legacies of colonization ‑‑ I would not show up ‑‑ well there are many communities that would be seen as invisible by reliance on surnames. We would like to see a reexamination on the types of voting, so we are happy to see coverages included on the final day of the final weekend. We would like to see all 4 days included. Because this is looking at turn out from the prior year of early voting in had a period that was one city wide race, we questioned if that is the best way to anticipate potential turn out in 2020 and 2021, so we would like to see that in all 4 days. We see the budget constraints and we would like to see more than city wide races covered as well. Lastly, again we are so pleased at the pace of the commission. We would like to see more ways for the public to comment on the final implementation or request language access for future cycles as well. It is wonderful to see so many people in the room and audience. We would love to continue to contribute to the success of this one. Thank you.

>>  Thank you, Amy. Any questions for her from the Commissioners?

>>  Thank you, Amy. I had a question about your recommendation to include noncitizens over 15. Can you speak more about that?

>>  Sure. So under the current proposal it uses, I recently published ACS data and because of the lag, a lot of people will naturalize in that time and because of state data with preregistered 16 and 17-year-olds ‑‑ we would like to see 15-year-olds included because by the time they are implemented and preregistered they will be of voting age so we want to see an acknowledgements of that lag and we will be acknowledging people that will be eligible over time toe naturalize. Because of public charge issues, increase of enforcement and a general fear in our community, we have seen a lot of requests for naturalization services and application support, so people are considering it at higher rates than before. I can't say that in the testimony, but we would like to see that whatever the data set, there are going to be people that are eligible.

>>  Clarifying questions?  Anyone else in the administration questions for Amy?  Thank you, Amy.

>>  The next person I would like to invite up is Ahyoung Kim from the Asian American association.

>>  Thank you for having us. I will be submitting a written this morning by email. Sorry about that. My name is Ahyoung ‑‑ I am a small business project manager and on the access advisor committee. We seek so strengthen the pan‑Asian population ‑‑ the fastest growing racial group in the city and we support nonprofit organizations ‑‑ we accomplish our mission through 4 program areas ‑‑ I have 2 issues to raise today given that the proposal in front of us ‑‑ one on the standard of need and second on the operation details.  First of all, I am sure you heard earlier on there is a section saying if there are fewer sites with significant concentrations that are allocated for a given language then we may consider providing services to another language. While we welcome the flexibility in this for the best method to implement interpretation, there has to be a clearer threshold ‑‑ this has come up and the answer we have gotten before is that no threshold has come up yet. I would like to recommend there be a threshold be set in the future and also for the CEC to consider for the community to maybe ask to reconsider once the poll sites are considered if the community feels not properly represented they are able to request the services. Secondly, I understand that the methodology is mainly about the sites we are going to give the interpretation services but we believe it is important to keep in mind the problems we see in today’s interpretation services, the issue of quality control themselves ‑‑ we would like to see more detail in terms of how it will be held, what kinds of education the interpreters are going to be receiving and  a kinds of control will be done. As of now, I believe they are rely original the third-party inventory doctor to drain interpreters. We would like to ask if the CEC has the ability to take it on as a service and also if the outreach and recruitment will be available for public comment once the rules are set.

>>  Thank you. Clarifying questions?

>>  Yes. I have a question ‑‑ what are your specific things with the party vendors?

>>  So this is not about the CEC, but in terms of the services given by DOE now ‑‑ we hear from the partner organizations where voters have been turned away by less aware interpreters that tell them because you are not registered ‑‑ you are not allowed to vote here. It happens every election especially where interpreters are less trained and come with less of an awareness of their roll. They seem to interject on what authority they can say to the voters so saying a better form of education and outreach.

>>  Any other questions?  Thank you so much.

>>  Next person that I have on the list is member of the advocacy group Mariya.

>>  Good afternoon. I am Shahana ‑‑ I am a member of the committee also the member of American equity group, a long-drawn vote of elections also there are other organizations called American salvation community services.  It is shortly an organization created, supported and a response initiative and has programs for the state of New York. It is a city engagement organization that engages is seminar programs for people. This group is a pointed to working with the government agency community basis organization and elected official ‑‑ the life of the communities since 2011. The advocacy group was founded in voice to the community to encourage people to demand for equal rights. This is the voice is especially for Bengali speaking population. We are in 5 boroughs including new Jersey and New York. Our community, which is the Bengali speaking population in Bronx, Queens, Brooklyn, Manhattan and Staten Island. We need to have a number of language assistant program. We are thankful on the board of elections that we have few only a few poll sites with translator language assistant, but this is not enough. This is very lack of the population we have in the city and states. So, it is very important for the Bengali Americans because I will keep saying the Bengali speaking population. That racial we don't have the language in the voting poll. There is a large ‑‑ the number of the people they are with the challenges of the language and language barrier. Most of the time, they don't go to vote because they feel embarrassed. They mainly go to the voting site ‑‑ for example we like myself when the first time I went to vote, the person assisting me was talking to me like I am stupid and dumb. That is the one that makes me like I am not citizen yet. I didn't feel like I am part of this city engagement. This has happened to me with the people that don't speak English, elder, sometimes they are from another country even though not Bengali sometimes. How they feel in their voting ‑‑ so lack of an assistant program or Bengali assistant organization ‑‑ we can see that people when they come to the ‑‑ it is a large number of people not voters ‑‑ because they don't feel like they are part of a voting access to go to vote but like if we have this language access program, it is giving you like couple of years ‑‑ 6, 7 years ago when we were demanding for a language assistant program, there is some translator in Brooklyn and Queens, you can go and check there is a large number of voter numbers in the Bengali speaking populations because they are very comfortable when they come here and when they go back, they feel good and give a message to the community. They don't have to depend on anyone.

>>  Sorry to interrupt your time ‑‑ can you offer a closing sentence.

>>  One more thing ‑‑ if we have a language access program, then the people will be free. They don't have to go to a family member. They can participate their civic duty. I am encouraging the language assistant program all over the city and especially the program for Bengali speaking people to participate.

>>  Thank you so much. Any clarifying questions?  Thank you so much. Next, I would like to invite Mariya Mark with the Russian community.

>>  Thank you so much. I am Mariya Mark with the Russian speaking community. I work for the city, but I am here as a private individual. The language program has been great to help New Yorkers the last few years. I have been happy to watch the service grow. Due to the board of elections inability to provide some languages that we were discussing today, is it is wonderful the city has stepped in to get the translator to the sites into the buildings. During the last elections under the mayor’s office of immigrant affairs, a hundred poll sites ‑‑ of them 70 provided language access to the language Russia community, polish Italian and Yiddish. Some were in front of door visible. Others had translators in bad locations with signs leading voters through a maze before they could find anyone to help them at the polls. There were volunteers like myself giving out flyer to let people know there were translators. There were sites that were not used because voters didn't know the translation services were available. I believe the voters should be informed ahead of time. That can be done through mailers where we have the whole site interpreters at. People can actually know and go out to actually use the services. The truth is if you have 50 or a hundred or 200 poll sites, it doesn't matter if people are using them ‑‑ you can have 5 poll sites everyone uses which would be better than 200, so getting that information out is important. I agree with the proposed methodology including the extra languages covered and believe the way you are planning to do is important. Have that threshold is important to know where the cut off is. If there is a threshold for 20 to 30 eligible voters to fall within the guidelines, that may be a good number. You can do more ‑‑ 5 potential voters may not be cost effective if you are running on a budget but having between 20 and 30 could be more reasonably. I do have a question and thought about the current way that the poll site translators are done. Know there is a capacity to have up to 4 languages at every poll site. At the last round there were not. We are also including more languages with the next methodology so our partners at apna, they would be able to be at the Y‑‑ with the Russian speaking community as well throughout the city. There is a question about try language interpreters because some people may speak many languages. If someone can speak both in Yiddish and in Russian, that can be an additional ‑‑ one individual that would be helping 2 communities and it may be a great thing to add more of those trilingual communities ‑‑ great for locations where people speak multiple languages.

>>  I will ask you to wrap up.

>>  Actually, that was the end of it. So, thank you so much for giving me the time and for everybody being here for an important cause.

>>  Any questions?

>>  Thank you.

>>  You mentioned in your testimony ‑‑ thank you. You mentioned that there is a maze before you can find the interpretation services. Is that a metaphor or is there a physical barrier to overcome?

>>  The poll site I vote at, I was looking for the translators and had my child in a stroller. In order to find the translators, I had to go through many hall ways then when I finally found them, there were steps going down so I can yell to them and they would be able to come up to me but that was an extra very odd situation although in other poll sites they were right at the door ‑‑ so.

>>  Anymore questions in the room?  Okay. Thank you. Next person I have on the list is the New York immigration ‑‑

>>  Hello. I am the senior director of civic engagement at the New York (inaudible). We are a policy organization with over 150 organizations statewide. Today we are here to present testimony on the poll site language assistance program. I want to thank the commission for the work around methodology, we believe a standard trance parent methodology will improve language access for the voters as well lead to a more inclusive democracy ‑‑ we dove a few recommendations to share ‑‑ some have been highlighted by previous testimonies but ours are 1 ‑‑ around the data set not to remove 15 to 16-year-olds and the noncitizens. Second recommendation ‑‑ don't use turn out data of past services in factors of future. 3 ‑‑ standardizing the language access services for all elections. To speak beyond the first recommendation is the timeliness of the ACS  data. I know it points on the 2018 data but if you factor in had the city budget, 2 of the 3 elections this year especially primaries happen within the physical 2020 that means we are using the 2017 data so for 2 of the 3 elections this year, not including the special elections we are using 3 year old data. What does that mean for us?  It is not inclusive of it, so it is not inclusive of the populations and changes within a population, so we want to mitigate the changes but including noncitizens and 15 to 17-year-olds. Every year about 86,000 residents become citizens and about the same number of people 15 to 17. That is about 170 thousand individuals per year over the course of 3 years then you look at close to half a million voters not included in the methodology. We encourage to include those populations. As we are in the Census conversation. We know the Census bureau under count communities of color and those that would benefit from language services so a more expansive data set will all set recurring the communities most in need of the language services. Our second recommendation is around turn out. It is difficult to predict. We believe that under the current methodology, we are using turn out a past usage data. This is not the best way to determine usage because we should be anticipating future usage ‑‑ we should look forward and anticipate the need rather than look at the needs in the past not being met. People say have not been using the services you because they were not well advised or serviced. Promotional services all together make a lack of utilization ‑‑ we believe that usage would increase with a language standing program and we can't let the usage determine which poll sites or languages are included ‑‑ the last point is around early voting. We are now in the stages of early voters. Our state should be accustomed to early voting. It is very confusing because not everything under early voting is covered. That would be confusing so we prefer standardization and we hope that we would not have to limit interpretation services for early voting to just one weekend and to elections for a city wide race because if you look at the Queens elections, Queens is one of the most language diverse counties and an election there is critical to provide services ‑‑ not included with the current services so we recommend a standard language services. We intend to submit written testimony so look forward to that. I want to talk about recruitment, quality of interpretation, training of poll site work. Feedback is the most important from the public. We hope that in the future, these things can be considered and spelled out in a process clear for our voters.

>>  Thank you. Clarifying questions?

>>  It would be great if you have the written testimony because you covered so much.

>>  I have a preliminary copy I am happy to share with you, but I want to include better data, but I can pass it around.

>>  I could not keep up.

>>  I was very aware of the 3-minute mark. I have been beeped so ‑‑

>>  To everyone else that has spoken and will be speaking, if you have not given us a written version, you can email to us or submit online. It is critical to have the information in writing as we review the feedback.

>>  The next person on list is Arab association of New York ‑‑

>>  Hello. I am Tom ‑‑ and I want to thank the organization for the work here very much. In the Arab American communities, under voting is critical. As our community tries to ‑‑ the work of the commission will be a large part of the work to help immigrants from the Arab world gain citizenship and the right to work. There is irony in people investing time effort in gaining citizenship only to not be able to vote because of lack of translation. We are grateful this work is being done. We have a limited amount of new information to add. We want to reinforce the points made by previous speaks and New York immigration commission. It is a situation where we agree with the key recommendations not to remove 15 to 17s and noncitizens.  These populations are going to not only going to contribute but as a result of that we think it is important to consider them in determining locations for polling sites. Additionally, standing by polling sites for turn out and factors to be considered. That is one that is particularly of note. We are thrilled of accommodations for early voting but for a lot of immigrants it can be difficult to understand that there are translation services ‑‑ beyond that we just have extremely limited new information to add. Essentially, we just want to thank commission for the work you are doing ‑‑ and to say that as long as certain accommodations are made, we are looking forward to opening up the election in the coming months to thousands of New Yorkers.

>>  Thank you. Any clarifying questions?  Okay. Thank you. Next, I have from Lerner Susan Lerner.

>>  As you. I am the executive director of common cause New York. It is a 50-year-old organization that works to improve and make the democracy more effective and inclusive. We have a presence in 36 states. I am happy to be here today. Thank you for talking about the challenging task ‑‑ they have been a strong supporter for translation services, and we have worked to help develop trainings and work with translators. We also spent significant time on election day going around to polls to where people were assigned and frustrated with the way the board of elections at the time kept the translators at a distance. I know it has been hard to find them. We were happy to see that as part of the Civic Engagement Commissions found that you were tasked with developing the supervisor because it was clear that they had to accept translators, so I would like to repeat and second the recommendations of the colleagues in the new American communities. We rely on the colleagues in the different organizations among others that recommend the metrics you should use to identify languages. I would like to make additional suggestions. First ‑‑ we have been supporters and I think successful advocates for early voting in New York state. I am concerned that you are shorting early voting in your thinking because of the limited experience in last November. We knew last November would be a low turnout election. That is why we had early voting start during that time period so the problems could be worked out ‑‑ 2020 and 2021 we believe will be different. As previously testified, the highest use of early voting tends to be on the weekends. We have 2 weekends. I urge you to consider having translation services on those weekends. As more people are familiar with early voting, word of mouth is good, and more people will take advantage of it and it is absolutely predictable that the spikes will be on the weekends. If you have the resources to consider extra help on the weeknights ‑‑ that is when we see the most turn out for early voting. I urge you to be transparent in your voting. One of the things that ended up in the previous program, we don't understand how they chose, what languages, and which poll sites so after you concluded with your methodology and made adjustments, I would suggest that the final step is after you have applied that methodology to the data, release your calculations, it is better for the public so see why you made the choices you made, and some people will pull out the calculations ‑‑ that is a good thing. Because we are going to have such expected large turnout in 2020 and 2021, you seriously need an adjustment to the program between the 2020 election and 2021 ‑‑ use 2020 as a pilot ‑‑ anticipating an equally large turn out because this is a city program and I would suggest don't wait until September 2022. The calendar and Census calendar are against you when it comes to adjustments for the June 2021 primary. I don't know you will be able to factor in new Census data but you should look after the presidential cycle so when you are going into the city program, you feel that you have strengthened the program then I would also ask please have a similar hearing to this one as you are developing your training program. As someone that participated in am developing the training, there is a lot of wealth of knowledge in the room and in our communities and I think the training program will benefit from the experience of organizations that are here ‑‑ those of us that have worked with voters over the years in different communities to be sure that the training hits everything that we have experienced ourselves in trying to help voters. Your training program will be stronger and the transparency is always welcome by the public have we at common cause look forward to working with you and it has been mentioned by recruitment of translators is very challenging so we look forward to working with you on the training and on advertising the program to be a model for the rest of the country to be as successful as possible to be sure every eligible New Yorker has an opportunity to cast a ballot with an understanding.

>>  Thank you, Susan. Clarifying questions?

>>  Thank you. Next the Muslim community network?  Saad Khaishgi.

>>  Hi. I would like to start with the unusual request. Can you please hand me back all your testimony?  Because I will send one tomorrow which will be perfect. I had half an hour to make this up. So, I would like to present my best foot forward. I will send it back tomorrow. Good afternoon. I deliver this on behalf of the Muslim communities network a civil society solved in religious diversity program. I am the civic advocacy coordinator and preventing hate crimes against Muslim. The reality of language translations can't be stressed enough. If there is a true interest in the communities, exercise this civic right to vote. When seeing the expensive network, most individuals will be exposed to other locations than their neighborhoods. There for, this can be through pop up voting sites, finding information of where to go to vote and however all the pop up sites will be culturally appropriate language and literature as well as appropriate language, resources at every site where people of various languages speak which does happen but I have heard from other people in politic organizations that have their issues. I guess there is a lack of understanding between the language required and who shows up. There is another factor that is direct to language access ‑‑ outreach is the responsibility of the political and governmental bodies so be sure people are aware of the elections happening and to elaborate on the importance ever the vote. Having done work in the 2018 elections myself, I am confident to say there is lack of outreach to immigrant communities for the awareness of the elections and their roll in voting. While ESL decided whether they should be part of immigration policies ‑‑ as of now we need to improve integration and create a better overall connection between community and elections. As of now we are ensuring that both language access and outreach occur. (Inaudible) is already using this as we conduct hate crime surveys as well as flyers and surveys language appropriate to the communities we are working with ‑‑ it would also be relevant that MCN would be pleased to work with government bodies to provide access to communities and CBOs where we operate. With all of this, I would like to conclude that if anyone from the office of civic engagement or other audience members wish to discuss the information further you can contact me at Saad@mcn.org.

>>  In your second paragraph you are asking ‑‑ that you want language appropriate resources at every poll.

>>  Yes. What I meant by that is by which is why I am trying to go rewrite it for tomorrow. I was trying to say that we need method for information to be able to reach the public beyond their own neighborhoods ‑‑ I have to reword it but you need pop up sites and places for people to get information where to go. Maybe they are not in their neighborhood the whole day.

>>  How does someone vote outside of where they live.

>>  I have to rewrite that. I was talking about from the information period. It was a bit of a rush.

>>  So, to clarify, notifications do go out to all of the voters. I am assuming the languages are limited ‑‑ do you know how many languages they translate?  I think 4. That is a good question for us to consider in the future ‑‑ it is going to become part of terms of notification of the voting.

>>  I would just like to do that which is the factor that when it comes to languages in the Bronx where I was recently, I large section of Muslim communities there speak languages other than the 12 to 14 there ‑‑ very specific dialogues and I know how difficult that is but you will leave out a lot of people if one doesn't get more precise with who is living will and what is going on and I notice that in the work I am doing.

>>  Questions?  Comment before I call up the next witness.

>>  Just an apology that I have to leave.

>>  I have one question for you. ‑‑ the Albanian community ‑‑ that is 500,000 New Yorkers in the Bronx ‑‑ they are not all but ‑‑

>>  Turkish would be another language. When we talk about the African community it is another universe.

>>  So, thank you pardon the interruption I want to apologize that I have to go chair another meeting up town. It has nothing to do with anything everyone has said. I am sorry to miss the testimonies I will not hear. Forgive me.  Thank you very much for the testimony so far. Thank you.

>>  The next person is Jerry Vattamala from the Asian American legal defense fund.

>>  I am the director of the democracy program. We are national civil rights organization, racial justice organization and we want to protect the rights of Asian Americans. We do this through advocacy. We have been very involved in language assistant in the country. We have a long history in New York City. We started poll monitoring and conducting Asian American poll in 1988 starting in mostly China town, lower east side and brook line. We have expanded to 14 states and Washington DC. We have had problems with the elections program showing compliance with the registered voting rights act. When Chinese interpretation was required in Manhattan Brooklyn and Queens the board said they could not fit the Chinese translation. We had to print on paper and show it could fit. Once we convinced them it would fit, they said they would not translate the candidates’ names and we objected and the department agreed with us at the time and required the board of elections to translate allowing many Chinese to cast a vote. There were many problems where the wrong Chinese interpreters were sent to the wrong parts of town. In the 2000 primary election ‑‑ they had miss translated Republican and democracy ‑‑ we sued the board of elections in 2006 for failing to comply with section 206. The board settled case with us, and it is including a target methodology. We feel that it is targeting methodology that captures the correct number the poll sites. We also in 2013 had to sue the board of elections for failing section 203 for not giving ballot is in Queens county for Bengali. We had to sue them because of the 4 elections in the row without Bengali ballots. So, giving a sense of the background, we of done a lot work with the board. There are certain areas where we noticed there was a huge need from the community, but the federal voting rights didn't provide any relief for us specifically for the Bengali community. We sent many letters to the board to ask for Bengali interpreters at 4 poll sites in the Bronx and 3 in Brooklyn. We admit they are not covered in section 203 and the response said they are not required sorry you are out of luck. We are pleased to see another option we have here through this commission. I want to share these letters with you. I will provide electronic copies to whoever can receive them. We sent these in 2014 and 2015 so now we are coming up on 5 or 6 years and the effort in the letters by a year or 2 where we begged for Bengali language at target poll sites. Not every poll site. This is also am response to community members. We work with community-based members across the city. It is a problem to not receive input from these organizations. The board of elections has an agreement with us ‑‑ established language advisory committees ‑‑ this is the best resource for admit administrators ‑‑ we meet with the board of elections twice a year to talk about problems with Chinese and Korean language assistance. We have open line of communication for Bengali language assistance. We need to establish language committees comprised of the legal based organization doing work on election day. We are at poll sites, providing real time voter protection across the city. Which have poll monitors ‑‑ attorneys and law students travelling to poll sites so we know where the problems are. These are recurring problems ‑‑ specific poll sites in the Bronx and Brooklyn. We know that Bengali is covered in Queens. I urge you not to overlook Bengali because it is covered in Queens county. There is a specific need at targeted poll sites in the Bronx and Brooklyn. I will close with this ‑‑ our observation letter we sent to the board of elections on February 22, 2019 after the midterm elections. We had several thousand Asian American voters we interacted with and teams of attorneys and law students monitoring many poll sites in Manhattan Brooklyn and Queens. There were not enough interpreters in every language, so even when the 203 language there are huge holes there, so I urge you to look at the methodology for Chinese and Korean around think about language advisory committees. They have worked well in the ones we have been a part of and the connection to the groups turning out voters for those that are limited language proficient. They are working with us on board of protection, doing communities education, we need the groups in the room to provide some contacts and feedback. You will get information that you see in the letters. Those letter that is you see today ‑‑ the process was started by community-based organizations says we need Bengali interpreters in the Bronx and Brooklyn so I hope you that I can that into consideration. I am happy to answer any questions you may have?

>>  Thank you. Do we have questions?

>>  Thank you. Your targeting methodology ‑‑ is that all of it?

>>  No. That is the targeting methodology that the board of elections greed to adopt.

>>  How does it compare ‑‑ are you planning to provide a written?

>>  If it is too big of a question maybe you can sort of share with us how it compares to what we are proposing.

>>  You are working with more organizations than were involved inlet city planning data and commission. There is significant overlap. They worked closely with us to develop methodology ‑‑ there is opportunity to submit in put where there are gaps where the formula may not take into account needs of the community, so that is why I am pushing for the evolvement of some type of language involvement committee. In the written committee, I will give detail but there is significant overlap we are pleased to see.

>>  Just a clarifying question ‑‑ the CEC does have a language assistant committee of the ten language groups and more so are you saying your recommendation is we have a group for each language?

>>  Yes.

>>  You can have that meeting with all of the groups together, but there are needs for certain language groups and it is good at the need for each language.

>>  You have given us a lot of information ‑‑ I know you had a lot of handouts and copies of letters. Can you be sure they are submitted to us in accessible format preferably a word document.

>>  I am happy to do that. I want to note there is a level of frustration too. The letters if you look at the date from 2014 ‑‑ we have been struggling to get language assistance at places. We are happy to see other language groups receive language assistance, but we would like to be included too. It is important that all groups to the except possible receive the assistance needed.

>>  Are there people with additional people signed up to offer comments that didn't already cover?  Okay. It looks like we have covered everybody signed up which is great. I will open for a brief period of discussion among the Commissioners. If you would like to offer comments or thoughts on the methodology you are welcome.

>>  I think we should be looking at recommendations ‑‑ to help us be sure that I agree with the comment of let's use this as a pilot year so we get it right next year with one of the biggest as I elections we haven't seen in the past 8 years right?  So looking at how we restore or include 15 to 17-years-olds, not removing the noncitizen data as we heard over 170 thousand noncitizens who half way become citizens each year naturalize and 15 to 17-year-olds ‑‑ that significant population we are not looking at now and that would be a blind site on our part of not looking at it and not looking at turn out or using past services as factors as you heard from I think Mariya ‑‑ who spoke from the Russian community. That program which had a number of Russian translators of the pilot program, there was a number of limitations in the program where you saw year 1 or election 1 will the board of elections didn't let them in. Year 2 ‑‑ they comprised and were allowed inside the building but placed where the board of elections deemed it appropriate which was not accessible. When we are talking about language accessibility, it needs to be physically accessible. Lastly, I do want to point out the last part of early voting was done for a slow election, small election and one that we it was done intentional to see how the process would work out. Looking at that data will not be comprehensive into looking at a presidential year or a year with all of the city-wide ballot and council seating up for grabs as well. Thank you.

>>  You can ask clarifying questions.

>>  Thank you. Are we hiring and training interpreters?

>>  So far, the city has been using third party vendors. We have not ‑‑ we are required to have regulations related to interpretation and are you still in the room?

>>  He went out.

>>  We are required to work on the rules for qualifications for interpreters. That will be a separate conversation. Whether or not a third-party vendor handles the interpreters is a separate question but once we have the rules, we can ask the vendor to follow the rules. We are just talking about rules forming for at the particular times if you would like to chime in. The question was are we using a third-party vendor. What quality control will we have on the interpreters on their qualifications and training.

>>  The commission has to propose rules for the requirements for training.

>>  Who is the lead agency now?  A hear a lot of conflict because of the board of elections and I think most people can understands that there is con fusion and sometimes with our data control in general. If we came up with certain procedures, how do we know it is implemented who is the lead agency that not DOE.

>>  Also to what capacity do we have to make recommendations to the DOE, because a lot of who we are hearing here has Lilliam to do with the mandate which are trying to comply with so a lot of it is frustration with the lack of staff ‑‑ translators are usually in the back of the cafeteria ‑‑ you can't find them. The sign in seat doesn't exist. A lot of this is not part of the methodology conversation. What is the power we have to speak or recommend to the DOE further other than this?

>>  One of the things we need to remember is the collaboration grounds of election day between the city’s interpretation services and board of elections. That will continue. We are working together to provide service for New Yorkers and as a commission where he committed to working together to do that. As far as the concerns into the related to services that the commission provides but feedback on the DOE program, there are opportunities to submit the comments directly to the board of directions and they are instructed for us because service provision is challenging not just for elections but interpretation services is challenging overall. The city providing any service is never a perfect process. There are always opportunities to learn from the feedback we heard today including criticism as to how we can do better. If continued cooperation we can work to the to improve the services.

>>  I have a question about outreach because I ‑‑ I was really pleased to hear all the testimony we had today. It was rich and informative ‑‑ a couple people mentioned outreach. We talked about this at the last commission. But I think our service is going on in the fall on the poll sites unless we do efficient outreach unless we are not available. If we are considering a methodology that divorces from registered voters, then we don't have the ability to contact people. There will have to be a different outreach to get to people that are not citizens and younger. I am interested to hear about our resources to do that outreach and how we if we are going to rely on the organizations or have lists to contact. The other comment is the testimony we heard today, and I am also interested am in hear from the groups we didn't hear from on the language list. I didn't see anyone hear from the Creole communities, Polish community etc. I hope we can tap our language advisory group to get some feedback from them.

>>  Thank you. Those were good comments. We are going to circle back with folks on the communities not represented here today to be sure we get input from them for sure. Then also your question about the commission outreach plan is critical. We need to work on that. That is part of the work we will be doing with the assistance advisory committee ‑‑ is working on how to help people become aware of services because it is true of any service offered ‑‑ you can create it, but if you don't let people know about it you see the civilization rates are low.

>>  Back to the question about who provides the language translation ‑‑ we should if it is not set or will be set very soon ‑‑ we should just look at the third party vendor agreement and be sure there is possibility of translator worker co‑ops be part of that. There are growing cooperatives here in the city.

>>  Can we write a letter with some recommendations here today to the DOE?  Or is that out of the scope of what we can do here?

>>  We are actually but the city has a conversation with DOE, and it cooperates in terms of implementing poll interpretation services. That is happening. There is ongoing interpretation. We will be part of that. We have also reached out and we will have our meeting to discuss the work that we are doing. This is just the beginning phase ‑‑ proposed methodology ‑‑ to improve what was proposed and very committed we all share that commitment. Some of you work the polls. You know what it is like. So, we will work toward that for sure.

>>  I am wondering about the capacity to expand the language advisory committees. That was a compelling recommendation and I am interested in those hard to reach communities language groups that have not shown up like Haiti.

>>  This goes on the question of outreach. It is hard to imagine a universe will everyone that needs interpretation is served ‑‑

>>  But it should be our vision.

>>  I think people are not informed of their rights and their ability to bring an interpreter into the poll site and that is something we should educate people about their rights for poll interpretation or the disability community ‑‑ you can bring someone. We should be sure that are is part of the outreach effort.

>>  We have data from this program that has information about these people so something as simple as talking about the voting rights but also will they can go to get the services once we have of a program. I think that is what you are talking about. As an immigrant resident myself, it took a while to get 2 languages. It looks like we know better know. So, I think to your point is we can have a perfect program but if we don't spends the dollars or resources or partnerships to get in the communities ‑‑ I witness now a lot when we go vote. I don't know if it is just the English proficient or no one knows the translators are there.

>>  One last comment ‑‑ I want to repeat the comment that the recommendations were excellent and we have smart people that think about how to integrate those so I am confident we will come up with something that reflect the thinking of our colleagues. I want to underscore the importance of the over site and quality piece because it is not squarely in the mandates. We can have the perfect program well designed program, but the sort of magic is in the implementation and that is not just about developing a set of rules around it but the next step ahead ‑‑ how do we monitor or ensure quality control. That is incredibly resource intensive ‑‑ just to underscore for me that is the biggest take away from tonight.

>>  One other thing I would like to add ‑‑ we heard a lot about the senior community. As much as we are working hard to integrate available language interpretation ‑‑ if the seniors can't see it then we are not getting anywhere so I would urges the commission to work with the mayor's office for people with disabilities and whatever outreach has to be in a large enough font for the individuals to be able to see it in whatever language it needs to come by.

>>  I agree. If is not about seniors alone. We have a lot of people with disabilities that are not seniors. So, I think we should think about and get the fonts at least larger. I can't see it. With my glasses on. So ‑‑

>>  Well my guide dog is not going to read it. I have the same issue.

>>  We have a lot we have got from this. This is actually very good. I am thinking about our data sets. Maybe we need to look from what is some people were saying ‑‑ we need to broaden data sets or look in a different way which would be fine. That is something we may need to incorporate in am it. Because we may capture a larger amount of people by doing that and also the availability of being able to get the information out to all the communities. The most basic bit of information is what you actually said Sarah about people knowing that they can take right now ‑‑ they can take someone to the poll with them. Because DOE has not taken that information just it is not on anything that you have received from them saying they tell you about the elections, this tell you about how to vote but nowhere does it say if you need an interpreter, you can bring one to the polls with you. That is key to a lot of things ‑‑ a lot of the language people that are English is not their first language. They will be able to plan when they go to the polls even though with this they won't have to, but I think that is an important thing that needs to be out there.

>>  There are charter requirements for us to work on an outreach plan for the public as well as a process to monitor and respond to public complaints and services to provide.

>>  Okay so an in-house scope.

>>  Yes. Specifically, for us.

>>  Part of the process ‑‑ the problem with the 15-year-olds. We are assuming we don't update the data in the next 3 years at all. The other problem is you are actually targeting people that won't vote to the effectiveness is nonexistent people. If we charge the data should be updated every cycle and not looking 3 years down the road because you will target people saying my grandson is 15 years hold mean while he is not existing for the next 3 years so going back to get an analysis of the voting cycle, the numbers will be diluted. It is not about giving someone the opportunity to vote but it is really putting nonexistent voters into a base now. The voter base should be updated every year and fresh statements can be made.

>>  The problem with the data of looking at 15 to 17-year-olds and saying we should be looking every year. When the ACS study is done, it takes time to come out, so you need to go back to the same ACS data that is old. So, if you look at 2017 at a 15-year-old ‑‑ now they are 18. The data doesn't come out very quickly. By the time you get the full report out t‑ is already 2 or 3 years later. If you include them ‑‑ that is how the city I don't know if anyone is from the city department of planning this year ‑‑ we should like really access what is the data we are looking for and how soon the city gets it. Maybe they are getting it before we do as the general public.

>>  Can the city tell us how old the data is?  Year old data or not?

>>  The comment on how long it takes for the data to be available to the public and what impact that has in terms of the validity of the data.

>>  Just 12 months ago.

>>  My only intent is to get the best data to reach the best market. It is not about excluding people. It is not making it come out or not. It is a matter of whether or not you will get the effectiveness. We are putting this much time into it. We want to be effective. We don't want sites will we expected 20 people to show up and 6 people show up. And we say how did that happen.

>>  Well you don't want to plan too leave anyone out. You want to include everyone.

>>  We want to include voters. Not everyone that is alive.

>>  The point of the noncitizen ‑‑ we have to discuss for you to understand it. In the immigrant communities in the way the country is moving now if you look the data of how many new immigrants become naturalized, it is insane. It.

>>  We can look at the numbers look like in the data analysis. Rerun the numbers.

>>  We have ‑‑ you can pull out how many folks ‑‑ it is happening on an annual pace ‑‑ the number was 86 thousand mentioned ‑‑ in testimony, but going back to the acs data, we have put in the 2017 acs data sample which is 3 years old. So if I want us to be as intentional in this process ‑‑ if we are going to use 3 year old data ‑‑ if 2017 is the date we are referencing from, we should look at the 15 to 17 year olds who by now are probably 18.

>>  Just to clarify, we did say partly because of availability issues to use the 2017 but for the final it will change. It doesn't address your issue but to clarify that we are going to be using 2018 ‑‑ 5-year data for the methodology for the next round of analysis.

>>  Because it is released in bits. The goal is to be sure we are using ‑‑

>>  We are the most people that need the services.

>>  I want to just put a reminder out there that trying to compare the different sources of data and quality and also, we want to cross check data sources so it is not like we are only using the American survey data. We are also using data potentially ‑‑ I know we don't want to but turn out data as across check because we want to be sure that we are using the data that is available, recognizing limitations but again one of the things I learned from this process is that the ACS data is actually the best data available to us.

>>  And we have used the data to present the methodology from the 2017 set that is fully available as other years after that. We want to be as expansive as possible with the limited view that we are in but at the same time not excluding people or under counting as we are going through the process because that would undermine our mission here.

>>  Any comments on Commissioners?  Discussion on anything you heard?  I just want to check with the folks in the back, are there other comments that we left out?  In.

>>  Saad ‑‑ I have one thing to say. We have to clarify it is not only noncitizens not registered to vote. There are a lot of citizens not registered at all. It is an important point to remember.

>>  Thank you for that. One more.

>>  Hi. Has it been considered to have something like a reverse phone bank will if I am at the polling site, my particular language, will is no interpreter available ‑‑ a central place where the majority of the languages are at a phone location I can call that the coworkers have an 800 number that I can call and get some assistance by phone even if not physically present. Would that solve anything?

>>  We have not considered that approach.

>>  I would say the New York City board collections doesn't permit phones inside polling places, so the use of phone assistance is not possible. That why real-life translators are used.

>>  What is the prohibition on phones?

>>  Well, it is a general prohibition on the use of phones and electronic devices while a person is inside the voting booth and the way it is by a person providing translation or a family member etc.

>>  Any other questions?  Comments?  So, I just want to thank everyone who has come today and shared with us and I want to remind people if they haven't sent in comments electronically by emailing or going on to the CEC website. I also want to remind people that the comments area is open until March 1. If you have anything about partners, community members or individuals that would be interested to submit comment, encourage them to do so. We are an engagement commission. This is our first public hearing. We would love to have engagement with the work we are trying to go do and we want to remind people we are open until March 1 so I hope we will get more commenting with the online options. If no one else has thoughts or comments, I would like to entertain a motion on adjourn this hearing. We are now adjourned. Thank you.