



AGENCY LANGUAGE ACCESS PLAN

NEW YORK CITY DEPARTMENT OF DESIGN AND CONSTRUCTION

2024

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## 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 Department of Design and Construction**

Language Access Coordinator name: **Dalela Harrison**

Language Access Coordinator title: **Associate Commissioner and EEO Officer**

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This Plan includes information about:

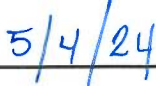
1	Agency mission and services	
2	Agency language access policy	
3	Language access needs assessment	How the agency assesses the language access needs of the people it serves
4	Notice of the right to language access services	How the agency notifies the public about their right to language access services
5	Provision of language services	What language services the agency provides
6	Resource planning	How the agency ensures that it has the internal and external resources to provide language services
7	Training	How the agency trains the staff to provide language services
8	Continuous improvement planning	How the agency ensures ongoing improvement of language access
9	Goals and actions planning	How the agency will put the plan into action


*[Please hyperlink the table of content to each section for easy navigation]*

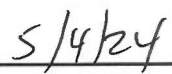
## Signatures

*[NOTE: In this section, include the signature of the LAC and the agency head/ commissioner, and attach LAIP. The signatures signify that agency will take necessary steps to advance equity and inclusion of individuals with LEP.]*

  
\_\_\_\_\_  
Dalela Harrison  
Associate Commissioner and EEO Officer, NYC DDC

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Thomas Foley  
Agency Head/Commissioner, NYC DDC

  
\_\_\_\_\_  
Date



## Section 1. Agency mission and services

Our Mission: The Department of Design and Construction is committed to delivering best-in-class infrastructure and public buildings for the City of New York, on time and on budget. Our design and construction professionals strive to improve project delivery, advance quality design, and ensure that our work meets the highest standards of endurance and resiliency.

Our Services:

**The Department of Design and Construction (DDC) builds for New York City.** As the City's primary capital construction project manager, we build many of the civic facilities New Yorkers use every day. We provide communities with new or renovated structures such as firehouses, libraries, police precincts, courthouses, senior centers, cultural art institutions and more. To successfully manage our portfolio, we collaborate with other City agencies, as well as with emerging and world-renowned architects and consultants to achieve our agency mission. Our Public Buildings Division manages the design and construction of a large range of civic buildings. Our Infrastructure Division designs and improves vital infrastructure, including streets, water mains, and storm and sanitary sewers, step streets, retaining walls, pedestrian ramps, bridges, and plazas for a healthy, resilient city. Our Safety and Site Support division provides valuable technical support to the Infrastructure and Public Buildings divisions, to ensure that we renovate, build and construct, safely.

Although we do not provide direct services to the public, we build for New Yorkers, and that means that we also ensure that New Yorkers are informed about our construction, the impact and nature of our improvements, the construction process, and our expected timelines.

DDC's Office of Community Outreach and Notification (OCON) is the primary unit, within our agency, that communicates with residents, businesses, and institutions about our work. Our OCON unit ensures that communities are heard and informed throughout the construction process. For most projects, a dedicated construction liaison is assigned to help the resident engineer address any community issues and concerns. We also prepare and distribute flyers, advisories and brochures for our projects that provide specific information, including what's being accomplished, when and where the construction will occur, and who to call if there are concerns from residents, or small business owners. This is the important work, performed daily, by our Community Construction Liaisons (CCLs)

CCLs work on behalf of DDC as the frontline contact in the community. They inform businesses and neighbors of construction activities, and quickly resolve any project-related impacts. CCLs can interact with the public daily depending on the status of the project and how near it is to start and / or completion. They prepare the community advisories and quarterly newsletters using plain language, to inform residents and businesses of the project, distribute 72-hour notices to let people know about temporary shut-downs related to construction, and follow those up with 24-hour notices. They knock on doors to prepare people for the coming construction work, leaving a notice if they aren't home, and they also meet with the Community Board and the Council Member's office to give updates. Our CCLs communicate through written correspondence and in person and being able to effectively communicate with members of the community, in their language, is critical to that work.



Figure 1: Business owner FAQ's in Spanish and Mandarin

## Section 2. Agency language access policy

At DDC, we believe that language should never be a barrier to opportunity, or access to information. The purpose of our Language Access policy is to ensure that individuals, with limited English proficiency (LEP), have equitable access to information about our projects and our service delivery.

We recognize the importance of effective communication between our agency and the city we serve. The information and updates that we provide the public, are an important aspect of construction project delivery, and it is imperative that our communication is accurate and inclusive. This Language Access policy is part of our commitment to provide timely, meaningful, and comprehensive information and updates to all New Yorkers, including individuals with limited English proficiency and those whose first or native language is something other than English.

Our goal is to ensure that the information we disseminate is clearly written, easily understood, reliable, and readily available to every community member. We will achieve these goals by prioritizing equity and inclusion efforts that include language access services to the public and notifying the public of the availability of these important benefits.

DDC has designated the Associate Commissioner of Equal Employment Opportunity (EEO), Dalela Harrison, as our agency's Language Access Coordinator ("LAC"). Associate Commissioner Harrison and her staff are the primary point of contacts, for language access compliance efforts, plan implementation, and language services, including interpretation and translation. Questions regarding DDC's Language Access Policy or our Language Access Implementation Plan can be directed to [DDCEEO@ddc.nyc.gov](mailto:DDCEEO@ddc.nyc.gov) or feel free to contact us by calling (718) 391-1776. We are here to help.

### Section 3. Language access needs assessment

In order to effectively plan and provide language access services, DDC will assess the needs of the public with limited English proficiency (LEP) by leveraging direct community feedback, as well as tools like NYC Planning, Population Factfinder, and American Community Survey (ACS) Data tables.

#### Four-Factor Analysis

DDC builds for all 5 of New York City's boroughs and the populations within, and we will be guided by the Four-Factor Analysis in evaluating the limited English proficient (LEP) populations served by the agency. This methodology provides a balanced assessment of language assistance needs while allowing flexibility to adjust language assistance measures.

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

In assessing the LEP population served by DDC, we will analyze our active and upcoming construction and service areas, by geographic location, using census data, to provide composition data regarding race, ethnicity, and language proficiency by zip code. We will continue to utilize data gathered directly from City Council members, by our Office of Community Outreach and Notification, during the development of construction project profiles. We will also leverage the information gathered using our Business and Residential Community Surveys. These surveys have already been translated into Arabic, Urdu, French, Polish, Spanish, Chinese (Traditional and Simplified), Russian, Bengali, Haitian Creole, and Korean. We use the community surveys in conjunction with language identification guides, to help recognize the primary language of individuals with Limited English Proficiency. DDC will continue using demographic data, to ensure that we are providing adequate language coverage.

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

In considering the frequency with which limited English proficiency individuals come into contact with the agency, we consider the role of the Community Construction Liaisons (CCLs) who work on behalf of DDC as the frontline contact in the community. Their sole responsibilities are to inform neighbors of construction activities, and quickly resolve any project-related impacts. CCLs can interact with the public daily depending on the status of the project and how near it is to start and / or completion. They prepare the community advisories and quarterly newsletters using plain language, in all 10 of the designated languages, to inform residents and businesses of the project, distribute 72-hour notices to let people know about temporary shut-downs related to construction, and follow those up with 24-hour notices. They knock on doors to prepare people for the coming work, leaving a notice if they aren't home, and they also meet with the Community Board and the Council Member's office to give updates. Our CCLs communicate through written correspondence and in person and being able to effectively communicate with members of the community, in their language, is critical to that work.

#### **• Factor 3: the importance of the benefit, service, information, or encounter to the limited English proficient person.**

Our advisories and notices include time-sensitive information about the benefit and impact of our construction projects, and it is important that information is as readily available to limited English proficiency persons as it is to those with advanced English proficiency. The lack of language services or inadequate interpretation and translation would result in insufficient access to information and could disproportionately inconvenience New Yorkers with Limited English proficiency while creating unnecessary safety risks, due to a lack of information.

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

The resources available that we use to comply with LL30, and related requirements include:

Language Line: Language Line's team includes 20,000+ LanguageLine® Certified Interpreters that are ready to support our organization, 24/7, that are fluent and certified in more than 240 languages. In addition to utilizing LanguageLine for translation services, DDC is contracting with Language Line to provide over-the-phone, telephonic interpretation, as needed, in the field, for 0.75 cents per minute. The resource will be available to both CCL's and DDC staff members whose work involves direct interactions with communities, served by our agency. LM Language Services Inc: LM Language Service is a MWBE firm, that we also use for In-person Interpretation, at a market hourly rate.

Volunteer Language Bank: DDC will be relaunching our internal Volunteer Language Bank of multi-lingual staff members who offer written and oral translation support, through community review of translated materials provided by our vendors. Although this program was initially launched in 2017, many of the participants left city service and we are eager to make the program bigger and better. DDC will provide additional training to staff on the procedures of identifying the primary language and connecting with Language Line.

#### **Section 4. Notice of the right to language access services**

DDC's plan for raising awareness and providing notice about Language access services is centered around informing the public of the availability of language services and how to access the benefits. This includes sharing information using our social media outlets, posting information on our website, including multilingual content on our website, posting signage in conspicuous community locations about the availability of free interpretation services, and leveraging "I speak" cards and similar resources, when engaging with the public.

#### **Section 5. Provision of language access services**

Based on DDC's limited direct access with the public we will use a very specific combination of language access services to provide access and information to the public with LEP, including Interpretation, Translation and Online Communication.

##### **A. Interpretation**

DDC has and will continue to leverage live interpretation services for our outreach events, community, and agency meetings, and as needed when interacting with the public and hosting



agency specific initiatives, like DDC talks, which is a signature agency event and platform for presentations by subject matter experts to discuss industry-specific topics.

We will also utilize telephonic interpretation services as part of our CCL community communication plans. Specifically, when an individual's preferred language is not easily identifiable, CCL's can utilize a Language Identification Guide to help identify the primary or preferred language of individuals with LEP and contact Language line telephonic interpretation services, as needed, which is available in over 250 languages and dialects.

## B. Translation

DDC will continue leveraging translation services to meet this mandate, as well. Our OCON unit regularly distributes public notices regarding the location and nature of planned construction, water supply shut-off, outages, closures, as well as Project Information Cards (PIC), quarterly newsletters, and advisories to the businesses and residents in the neighborhoods where construction projects take place. These publications, which are most commonly distributed, are used to inform the public about project status and the impact and duration of construction. OCON recently facilitated a workshop for CCL's on the art of plain language use, and we will continue to incorporate plain language principles in the development of these and other essential documents, prior to proceeding with the translation process. In addition, DDC will ensure the quality of final translations through community review and our contracted services. The OCON unit conducts internal reviews of distributed advisories to ensure that they are consistent and accurate and recently incorporated updated wording related to accessibility to ensure inclusivity.



Figure 2: Community Advisory-Service Interruptions in 3 of the 10 designated languages

## C. Digital/Online communication

DDC will use social media, online and digital communications and transactions to increase awareness and share multilingual content to ensure language access as well. We have and will continue using guidance from the Mayor's Office for People with Disabilities (or MOPD) and our agency's Disability Service Facilitator, Jason Wood, in these endeavors.

## D. Emergency communications

In our effort to plan for addressing language access needs in an emergency, DDC EEO will work closely with DDC's Emergency management liaison: Martin Reda RedaMa@ddc.nyc.gov 718-391-1275 and work with OCON to prepare general advisories with fill-in capabilities, in every language that can be used to notify the public of updates and revised timelines related to unforeseen events and incidences with construction-related impacts.

These will be made available in all of the designated languages as well as some additional languages as needed, to ensure that the Information is readily available, in short notice, for emergency situations. This may include stop-work advisories and other updated notifications related to delays in expected construction-related timelines. In the event that access to our construction or work sites are restricted, DDC will share that updated information, via our website as well.

## Section 6. Resource planning

DDC will use a combination of resources to implement the plan, including, but not limited to Bi-/multi-lingual staffing and Language service vendor contracts.

### A. Bi-/multi-lingual staffing

DDC will continue to develop our Voluntary Language Bank and solicit assistance in reviewing translated documents from bilingual staff. In late 2023, DDC EEO conducted a Workforce.

*Diversity Survey to solicit employee feedback that will inform future efforts, including prioritizing equity efforts, creating more diversity and inclusion training opportunities, and enhancing overall accessibility. As a result of the Survey, we learned that over 40 different languages and dialects are spoken within our workforce, and a significant percent of our workforce are polyglots and speak 3 or more languages fluently. Based on this information we plan to canvass for employees who are interested in volunteering to assist with translation review as part of our language bank.*

### B. Language service vendor contracts

DDC will contract with Language Line and LM language services for in person, and telephonic interpretation as well as for translation services. We are also looking into contracting with a vendor who can confirm language proficiency for our volunteer reviewers. DDC will maintain records and report this information for the Language Access Annual Report, in accordance with the LL30 of 2023.

Vendor name	Procurement method	Purpose of the contract	Language(s) provided by the vendor	Period of contract	Total award amount of contract
Language Line Service, Inc	Purchase Order	Document Translation, Telephonic Interpretation	240	2024 FY	\$2000
LM language	Purchase Order	In-person Interpretation	10	2024FY	\$500

## **C. Partnership with CBOs**

Due to the nature of our work, DDC does not have partnerships with CBOs at this time.

### **Section 7. Training**

DDC will ensure that front line and outreach staff and our workplace partners are familiar with language access obligations, through new hire orientation training as well as updates relevant to outreach-related duties. Training will include, when and how to use telephonic interpretation, when and how to request in-person interpretation, the difference between interpretation and translation services, writing and editing documents in plain language, how to identify the primary language of a person with LEP, and how to track individual's preferred language. A component has been added to new hire orientation, and we will be scheduling regular sessions for CCLs. The goal is to provide these trainings biennially.

### **Section 8. Continuous improvement planning**

DDC will assess trends and evaluate service needs and efficacy of the services being provided on an ongoing basis. We will review the LAIP implementation plan quarterly, to ensure that we are using relevant data and monitoring indicators to inform plan for continuous improvements.

#### **A. Data collection and monitoring**

DDC will track and report telephonic interpretation calls, location of project, language translation frequency, and length of call. This data will help assess trends, plan allocate resources and evaluate service needs and efficacy. In addition, the Language Access Coordinator will track Language service usage by monitoring the charges detailed on monthly invoices to DDC.

#### **B. Language access complaints**

DDC will monitor and respond to public complaints about language access as follows:

- The Language Access Coordinator and team will address all inquiries, requests, and complaints on behalf of DDC.
- The Language Access Coordinator will facilitate resolutions and track response time for reporting purposes.
- Complaints and requests related to language services may be submitted by contacting a CCL, by calling 311, by visiting DDC's website, by emailing us at [accessibility@ddc.nyc.gov](mailto:accessibility@ddc.nyc.gov), or by calling us at 718-391-1776.
- Complaint data will be tracked quarterly and DDC will include information about complaints as part of our annual reporting.

DDC will notify individuals of their right to file language access complaints by leveraging notices on our website containing multilingual information about the language access complaint channel(s) that are accessible to users with LEP. We will also include information on complaints as part of the Language Access Annual Report.

### Section 9. Goals and actions planning

DDC will review its language access goals and LAIP on a quarterly basis. In addition, we will update our language access implementation plan, based on changes in the agency's project locations and community population, at least every three years and publish the updates.

Language Access Goal	Action Steps/ Milestones	Stakeholders	Timeline
Develop and launch a volunteer language bank interest survey	Identify our language bank needs, create survey questions that will assess interest and proficiency, share survey-agencywide, identify staff proficient in the designated languages, assess barriers to participation; schedule proficiency assessments.	DDC Employees, CCLs, DDCEEO, Vendor	June 2024
Contract with a vendor to provide proficiency exams for volunteer reviewers	Compare pricing and assess MWBE vendors, schedule proficiency exams, review result and notify staff	DDC, Vendor	June 2024
Relaunch the Volunteer language Bank and community review program	Review the guide for engaging in Community review processes for translated material, review previous program, notify agency of relaunch, schedule first meeting and schedule quarterly meeting to follow, Draft baseline messaging for review process and begin reviewing content	Volunteers, DDCEEO, Vendor, OCON, CCLs	August 2024
Develop and facilitate an advance training for CCLs	Review previous training and update slides, finalize CCL workflow with OCON, incorporate workflow in the training and schedule training during the next quarterly meeting	OCON , CCLs, DDCEEO,	September 2024
Translate current advisories and prioritize fill-in emergency advisories, in the 10 designated languages for Emergency related notifications	Identify the types of notifications necessary, develop advisories with guidance from OCON and creative services, send for translation	DDC, OCON, CCLs, Vendor	June 2025
Develop a Cultural Sensitivity Workshop that includes language access	Assess best practices for development of training and consider current options.	DDC Employees, CCLs,	June 2025