



sanitation

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).

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This Plan includes information about:

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sanitation



Language Access Implementation Plan

New York City Department of Sanitation

City of New York

June 2025

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I. Agency Mission & Services

Mission of DSNY

The New York City Department of Sanitation (DSNY) provides high-quality and responsive cleaning, collection, and snow removal services to all New Yorkers in all parts of the City. The agency operates 59 district garages and manages a fleet of more than 2,000 collection trucks and 450 mechanical brooms. DSNY is currently engaged in a Trash Revolution to completely transform the way 8.5 million New Yorkers interact with 24 million pounds of daily residential waste. This includes major achievements in cleanliness, sustainability, quality of life and efficiency, making unprecedented progress in a long-overdue transformation of New York City streets. For generations, New Yorkers put up with massive mountains of trash bags on their streets, with municipal leaders insisting that it had to be this way. Under the leadership of the Adams administration, the Department of Sanitation has resoundingly said "NO!" to the status quo and is delivering New Yorkers the clean streets and sidewalks they expect and deserve. This includes cleaning more areas than ever-- highways, overpasses, step-streets, etc.-- and increased enforcement of core rules around cleanliness, as well as innovative strategic initiatives like containerization and curbside composting.

The Trash Revolution includes the launch of the first-ever citywide curbside composting program. This largest, easiest-to-use diversion program is keeping record amounts of material out of landfill week after week. Instead of millions of pounds of residential food and yard waste becoming methane and rat food, it is instead becoming high-quality compost or renewable energy.

In addition, DSNY is changing the rules regarding how waste is placed for collection, requiring containers with secure lids for both residential and business trash for the first time in 50 years-- leading to a dramatic decrease in rat sightings. This change requires substantial public education which must be linguistically and culturally competent. For that reason, our community engagement, outreach and educational efforts are specifically tailored and directed to not only the public at large, but also to identified neighborhood groups that would benefit from language translation services.

We are committed to providing Limited English Proficiency (LEP) individuals with free interpretation services and materials developed/implemented by DSNY, in compliance with the Mayor's Office of Immigrant Affairs (MOIA) guidelines. The New York City Customer Service Center (311) triages customer service requests and complaints citywide, and LEP-related service requests or complaints are handled through their available telephonic interpretation contact. As needed, DSNY also communicates with LEP individuals by providing educational and outreach materials with translations.

II. Agency Language Access Policy

In keeping with Local Law 30 of 2017, the NYC Department of Sanitation (DSNY) shall provide, to the extent possible, access to services and information to persons with Limited English Proficiency (LEP).

DSNY serves the LEP community in multiple languages by way of bi-lingual staff who are invited to meetings/events, distribution of translated/image-based materials, or contracted interpretation services in our Customer Service Unit when individuals are referred by 311.

The agency remains committed to developing and improving ways to maintain communications with the City's LEP community. We are working to:

- increase image-based messaging wherever possible to broaden LEP access to agency communications
- continuously update the online *Sanitation Material Request Form* to include additional language options
- work to improve our PDF database to include language translations for all outreach flyers
- continue re-evaluating the definition of “commonly distributed” to include as many pieces based on new usage data
- improve process to identify and track preferred language needs
- continue established partnerships with elected officials, community groups and immigrant/ethnic service organizations to provide outreach and education about DSNY services and codes to LEP customers
- review City Planning demographic/census data for changes and feedback from local community groups, service organizations and its field staff to improve and/or improve the identification of languages/translations needed for specific outreach or educational campaigns
- continue review of educational/informational material for plain language usage

III. Language Access Needs Assessment

U.S. Department of Justice “Four-Factor Analysis”

Title VI of the Civil Rights Act of 1964, prohibits discrimination based on race, color or national origin to include discrimination based on English proficiency. Therefore, service providers must provide the Limited English Population with access to programs, services, oral interpretation and written translation of vital documents.

In compliance with the DOJ's Four Factor Analysis (F.F.A) the Department must assess the following:

1. Proportion and demographics of LEP persons using the services
 2. Frequency of LEP persons come contact with services
 3. Nature and importance of services provided to LEP persons
 4. Resources available and costs to recipient
1. Proportion and demographics of LEP persons using the services: According to analysis of Census data provided by the Department of City Planning, approximately 50% of New Yorkers, or approximately 4.24 million New Yorkers, speak a language other than English at home. Twenty five percent of New Yorkers, or 2.12 million individuals, are considered limited English proficient (LEP), meaning that they self-identify as speaking English “less than very well.” LEP correlates with an increased need for language assistance. The top ten citywide languages (other than English) are based on data from the Census and the NYC Department of Education. Based on this analysis, the top ten citywide languages for FY21 - FY25 are: Spanish, Chinese, Russian, Bengali,

Haitian Creole, Korean, Arabic, Urdu, French, and Polish.¹

DSNY uses this general and neighborhood data along with feedback from local community groups, service organizations and its field personnel to determine what language translations may be helpful to a specific campaign.

¹ NYC Department of City Planning, Language Access (<https://www.nyc.gov/content/planning/pages/about-us/policies-notices#language-access>)

2. Frequency of LEP persons come in contact with services: While DSNY services do not require direct contact with the public, public contact is frequent, and we expect employees to meet the needs of all New Yorkers. We serve the LEP community in multiple languages by way of bi-lingual staff who are invited to meetings/events, distribute available translated/image- based material, or contracted interpretation services. Commonly used information is made available in the top ten citywide languages as determined by the Mayor's Office of Immigrant Affairs. In addition to the telephonic interpretation contract, we currently have 17 bilingual staff able to communicate in 12 languages: Chinese, French, German, Haitian Creole, Hindi, Italian, Nepali, Polish, Russian, Ukrainian, Spanish and Tibetan.
3. Nature and importance of services provided to LEP persons: DSNY understands the importance and benefits of communicating with LEP clients in their native languages and provides translated material or bilingual staff as part of our regular community engagement and outreach practices. Our translated materials educate New Yorkers on their responsibilities to help keep our city clean, safe and healthy and enforces the City's Administrative and Health Code related to Sanitation.
4. Resources available and costs to recipient: The NYC Customer Service Center at 311 is the primary source for reviewing and referring public requests for services and/or information to DSNY. When individuals are referred to DSNY by 311, DSNY's Public Affairs staff reviews the request and routes it to the appropriate division for investigation. We provide the same attention and prompt response (typically under the 14-day City Hall mandate) to the LEP community. Typically, our contracted telephonic interpretation service makes it possible for us to respond to LEP-related concerns on the day we receive the request.

FY24 LEP SPEND

Service/Vendor	Instances	Languages Represented	Total FY Cost
Voiance (telephonic)	2 calls	2	\$302.70
Eriksen Translations, Inc.		12 (10+Urdu/Yiddish)	\$17,699.13
C&E Media Outlets	N/A		\$0.00
		TOTAL	\$18,001.83

DSNY is committed to communicating with the LEP community in their native languages and provide them with easy access to DSNY's service-related information. As such we continue to seek ways reach out to make this possible.

IV. Notice of the Right to Language Access Services

In keeping with Local Law 30 of 2017, the NYC Department of Sanitation (DSNY) is required to inform residents who identify as Limited English Proficiency (LEP) of their right to access services in their preferred language.

Most of DSNY's approximately 10,000 personnel interact with the public daily, and as a customer service agency, DSNY takes professionalism and courtesy extremely seriously. This extends to creating a welcoming environment for LEP New Yorkers. All communications inviting residents to use our household special waste sites and several annual SAFE disposal events to dispose of harmful household products, and our Compost Giveback events are provided in multiple languages to ensure that all New Yorkers have access to these services.

Since April 2023, DSNY has been the City's lead coordinating agency on enforcement of the rules around street vending. This brings Sanitation Police Officers in frequent contact with LEP New Yorkers, and we employ Sanitation Police who can competently speak seven languages, with additional language access provided via a vendor. This work is described in more detail below.

V. Provision of Language Access Services

A. Interpretation

DSNY contracted with Voiance Language Services, LLC in FY24, and Accurate Communication, Inc. in FY25 for language access services.

Where in-house or City language bank expertise may be available, efforts are made to utilize them for translating and vetting materials for accuracy in the delivery of information. The volunteer Language Bank remains a valuable source for Language Access needs for DSNY.

B. Translation

DSNY contracted with Ericksen Translations in FY24 and Langalo, Inc. in FY25 for translation services.

Our community engagement and outreach staff are a valuable resource used to educate a variety of groups (i.e. property owners or building superintendents, merchants, etc.) utilizing multilingual material as needed. To ensure that our messages are clear and concise, we incorporate the use of plain language into our commonly distributed general information pieces. Our community engagement, outreach, correspondence and messaging teams, receive training in "writing in plain language". Developing and fostering plain writing fundamentals so that staff has a good basis for writing in plain language ensures that our material is understandable and when appropriate, easier to translate for

consistent messaging. DSNY has staff trained in plain language and a Chief Content Officer who reviews communications/messaging. We plan to continue reviewing and translating print pieces as warranted into the top ten designated languages and other languages as needs arise.

The Bureau of Public Affairs continues to work to incorporate the availability of translated documents in periodic employee updates and training sessions attended by both existing and new managerial/supervisory personnel. DSNY officials are updated on the new information from MOIA, availability of translated documents and staff training as warranted.

As mentioned above, most DSNY staff – front-line Sanitation Workers – serve the public each day without direct engagement. However, enforcement is a necessary component of urban cleanliness efforts, and language access is key to our enforcement work, particularly around street vending. Sanitation Police Officers speak seven languages, including Spanish, Urdu, Korean, Bengali, Mandarin, and Cantonese, and are trained to connect with a language access vendor if necessary.

C. Digital communication

DSNY utilizes multiple social media platforms (Facebook, X, Instagram, and LinkedIn), as well as the agency website, to communicate with the public.

Since DSNY's 2021 LAIP report, DSNY has worked on significantly increasing its presence online, as most New Yorkers, including those who identify as members of the LEP community, have smart phones or other online-enabled devices from which they receive their news. DSNY has staff solely dedicated to the agency's digital footprint. As such, DSNY has been better able to reach LEP communities to promote our initiatives.

D. Emergency communication

During major agency-related emergencies/weather events, (i.e., snowstorms), we work with NYC Emergency Management, which is the primary conduit for urgent public notifications during emergencies. Press releases and alerts are posted on the DSNY website where they can be translated in various languages via automatic translation tool. Our language priorities reference and adhere to MOIA's list of top ten languages to address LEP population needs in the targeted area. Education and outreach information is made available via email notification, media releases and/or media events. Our communications indicate to LEP individuals where they may find access to more information in their language.

DSNY continues to work very closely with its counterparts at the New York City Customer Service Center (311) to provide comprehensive up-to-date information on DSNY services and regulations, as well as to Sanitation Service Requests. Since 2001 when it was created, the City's 311 Customer Service Center has served as DSNY's "hot-line information center"; 311 assumed this responsibility for what was then the Sanitation Action Center. DSNY serves the public, including its LEP clients, via our access point to the public in the form of 311. As a result of the 311 contract for telephonic interpretation services, we can provide Language Access Services to LEP customers as warranted.

VI. Resource Planning

A. Bi-/multi-lingual staffing

The Bureau of Public Affairs has several bi-lingual staffers who are invited to meetings/events, distribute available translated/image- based material, or contracted interpretation services in our Customer Service Unit where escalated issues are referred from 311. Our bilingual staff who participate in community engagement and events wear language identifying tags (I speak X) and use image-based signage and arrows to communicate with and direct the public appropriately at events.

As staff prepares for events throughout the City, they take into consideration the neighborhood(s) that we will be visiting and commonly used information is made available in languages beyond the top ten if appropriate and feasible; staff attending these events also have access to telephonic interpretation should a LEP customer whose language is not available needs assistance.

B. Language service vendor contracts

Vendor Name	Procurement Method	Purpose of the contract	Language(s) provided by the vendor	Period of contract	Total award amount of the contract
Eriksen Translations Inc. (Resource Recovery Division -Formerly the Bureau of Recycling and Sustainability)	Micropurchase	Written Translations	10 designated languages; Other	7/2023 - 6/2024	\$20,000
Voiance Language Services, LLC. (Resource Recovery Division -Formerly the Bureau of Recycling and Sustainability)	Micropurchase	Telephonic Interpretation	Other	7/2023 - 6/2024	\$20,000
Eriksen Translations Inc. (Bureau of Commercial Waste)	Micropurchase	Written Translations	10 designated languages; Other	7/2023 - 6/2024	\$20,000
LM Language Services Inc. (Enforcement)	CT1 827 20238807287	Telephonic Interpretation	Other	7/2023 - 6/2024	\$100,000
Accurate Communication, Inc. (Agency-wide)	CT1 827 20248807741	Telephonic Interpretation	Other	5/2024-4/2027	\$1,000,000
Langalo, Inc. (Agency-wide)	CT1 827 20248807670	Written Translations	10 designated languages; Other	5/2024-4/2027	\$1,000,000

C. Partnership with Community-Based Organizations (CBOs)

DSNY currently does not partner with any community-based organizations to provide services to the LEP community.

VII. Training

Our Language Access Liaison, Antonio Whitaker, and any other “topic” appropriate staff – regularly attend MOIA led workshops and refresher training sessions regarding best practices and guidance on providing LEP services, Local Law 30 obligations and updates, providing easy access to multilingual information, ensuring language access services are readily accessible and available, plain language use and the importance of enhancing the LEP experience, just to name a few.

We also update DSNY officials and outreach staff on LEP-related services, resources available in other languages, vendor translation/interpretation contracts for services, Language Access Service information and translated material available on our website. Periodic employee workshops and training sessions are attended by both existing and new managerial/supervisory personnel. We also provide awareness and reminders of new practices and language-related resources available to the public and more importantly, we maintain an ongoing focus on plain language for consideration when developing agency messaging for LEP clients.

VIII. Continuous Improvement Planning

A. Data collection and monitoring

DSNY’s Bureau of Public Affairs which serves as the agency’s liaison to the Mayor’s Office of Immigrant Affairs periodically reviews agency language access practices, new needs, and available tools to determine their effectiveness and utility. DSNY will use metrics from the contracted language access providers to report requests for interpretation/translation services. Any DSNY related inquiries and requests handled by way of the New York City Customer Service Center -311 are recorded and made available by the appropriate language. We plan to frequently revisit current practices to find ways to improve how we capture LEP-related services and information.

B. Language Access Complaints

Antonio Whitaker, Language Access Coordinator and Assistant Director within the Bureau of Public Affairs oversees language access complaints forwarded to DSNY. DSNY rarely receives complaints submitted in languages other than English. We continue to experience that the NYC Customer Service Center (311) handles most inquiries/complaints requiring interpretation. Language access complaints are typically addressed through 311. On those rare occasions when LEP clients submit service requests by contacting 311, Public Affairs staff triages the request and contacts the

appropriate division for investigation. We provide the same attention and prompt response (usually under the 14-day City Hall mandate) to the LEP community. Typically, our contracted telephonic interpretation service makes it possible for us to respond to LEP-related concerns on the day we receive the request. We have also made telephonic interpretation services available to staff. As staff attend training, they are supplied with a guide and participate in orientation workshops on the use of the vendor telephonic interpretation services. We also developed and use a “Hello I Speak” flier and badges for outreach staff to enable LEP customers to identify staff able to communicate with them in their primary language. The public, including LEP customers may submit inquiries, complaints, or requests for DSNY services directly by contacting our Bureau of Public Affairs at: customerservice@dsny.nyc.gov, or by calling our Customer Service Unit at (212) 291-1220.

IX. Goals and Actions Planning

The NYC Department of Sanitation’s Bureau of Public Affairs has a long-term history of working with elected officials, block associations, neighborhood and community groups and ethnic organizations. These working relationships have helped our ongoing outreach efforts and facilitate translation of DSNY material as needed. Our ongoing efforts include regular contact and meetings with elected officials, neighborhood block associations, precinct community councils, school groups, civic associations and ethnic service groups. DSNY staff are aware of language access protocols including where to direct questions they may have regarding language services.

We are pleased to report that DSNY has continued to:

- offer trainings in several languages for schools, apartment building staff and businesses
- provide new direct links to translated materials via: nyc.gov/sanitationmaterials
- incorporate image-based materials where possible making it easier for LEP customers to understand DSNY messaging
- Work with our procurement office to secure new 3-year contracts with Langalo, Inc. (for translation services) and Accurate Communication, Inc. (for telephonic interpretation services).

Previous Language Access Goal	Update
Expand language services via vendor contracts	<p>Accurate Communication telephonic contract secured</p> <p>Langalo, Inc. translation contract secured</p> <p>Continued working relationship with Eriksen Translations, Inc. (via micro-purchase)</p> <p>30+ new documents translated</p> <p>Over 120 DSNY materials are available in various languages</p>
PDF Database	Ongoing work to improve our language PDFs database to include all fliers and updated information
Training	<p>Accurate Communication telephonic services: retraining as needed</p> <p>New staff: trained in plain language and informed of the protocol/process regarding translating material</p>
Improving ability to track LA requests	Ongoing

DSNY has entered into a new contract with Accurate Communication, Inc. for Language Access Line Services that is available to staff interacting with the public during outreach or customers deferred to our Customer Service Unit from the NYC Service Center 311. DSNY works closely with elected officials and the community boards in identified communities about specific programs and ensures that bilingual staff is available to address community needs. Our outreach staff continue to use the DSNY created “Hello I Speak” flier for outreach staff to identify the language spoken by LEP clients and direct them to available material in their primary language and wear badges identifying them as being able to communicate in languages other than English, so that LEP individuals will know who can better serve them.

As the DSNY’s Language Ambassador, the Bureau of Public Affairs works to:

- coordinate the provision of effective and timely interpretation service for written service requests, complaints, and correspondence requiring translation
- document and report translation services requested and provided
- coordinate vendor document translations as warranted and telephonic interpretation
- maintain up-to-date contact information for intra-agency and inter-agency assistance which may be available for language interpretation/translation
- consult with elected officials and community stakeholders to identify additional languages for specific situations as relevant
- provide links to contract/vendor translated material or access a translate function on the DSNY website to ensure LEP clients have access to information in multiple languages
- continue developing agency website information options for LEP-related documents and information
- work with community and ethnic media to disseminate critical information.

Conclusion

Antonio Whitaker, an Assistant Director within the Bureau of Public Affairs is DSNY's official Language Access Coordinator and liaison to the Mayor's Office of Immigrant Affairs.

The Language Access Plan is implemented by offering translated documents and information on our website where LEP clients may access over 100 languages.

To the extent possible and when available, bilingual staff communicate and interact with LEP clients at local community-based meetings and at table events to explain the event's current message and provide key information and brochures in their appropriate language. Since DSNY's last LAIP report, language access line services are now available to staff. They are provided with updates and reminders on the use of the language line services. The most commonly distributed printed educational pieces are translated in multiple languages and wherever appropriate, include imagery to make the information accessible and simple to understand.

During public events such as SAFE Disposal Events, DSNY has bilingual staff on hand and use of the language access line to assist LEP clients. The Department also provides signage using imagery and arrows to direct the public.

Lastly, we will continue to collaborate with elected officials and community groups to address any relevant translation issues. DSNY will revise its Language Access Plan at least every three years and will post it on the DSNY website: nyc.gov/sanitation.