

# NYC Emergency Management Language Access Implementation Plan

## June 2021

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### I. Agency name and agency language access coordinator

**Agency name:** New York City Emergency Management

**Language access coordinator:** Iskra Killgore, Assistant Commissioner, Community Preparedness Bureau

**Website link:** <https://www1.nyc.gov/site/em/about/language-access-plan.page>

### II. Agency mission and background

New York City Emergency Management (NYCEM) was created by Executive Order in 1996 and was subsequently elevated to departmental status by the City Charter in November 2001.

NYC Emergency Management helps New Yorkers before, during, and after emergencies through preparedness, education, and response.

This mission charges NYC Emergency Management to work with other City, state, federal and public/private partners. Emergencies in a city as large and complex as New York require a coordinated response. NYC Emergency Management works to ensure information gathering, decision making, and resource allocations are carried out efficiently.

#### **NYC Emergency Management programs**

##### **Emergency preparedness education**

In response to New Yorkers' growing concerns about public safety, NYC Emergency Management launched the Ready New York campaign in July 2003. The Ready New York program educates New Yorkers about the hazards they may face and encourages residents to prepare for emergencies. Since its start, the campaign has grown to feature nine guides to help New Yorkers prepare for emergencies. The majority of the preparedness guides are currently available in 13 languages online and are easily downloadable; guides can also be requested through 311. The guides are available in: English, Arabic, Bengali, Chinese, French, Haitian Creole, Italian, Korean, Polish, Russian, Spanish, Urdu, and Yiddish. Ready New York also has four preparedness videos available in English, Spanish, Mandarin, and Russian. Two of the videos are also available in Italian.

NYC Emergency Management has developed in-person and virtual outreach strategies to work with community groups, social service providers, schools, and other agencies to promote and publicize the availability of emergency preparedness guides. Together with government agencies and community partners, NYC Emergency Management has been

using proactive strategies to disseminate translated materials to people with limited English proficiency. Targeted mailings, interactive “Ready Up NYC” webinar series, and direct community outreach and media coverage to ethnic media outlets are just a few examples. The NYC Emergency Management website is ADA compliant. Ready New York guides are also available in audio format. Guides can be accessed via [NYC.gov/readyny](https://www.nyc.gov/readyny).

### **Community Preparedness**

NYC Emergency Management’s Community Preparedness team works with local community and faith-based organizations and networks to provide a direct connection to emergency planning resources and information. Throughout the year, Community Preparedness hosts trainings and events, offers tools to help build local planning capacity, and connects New Yorkers to citywide preparedness initiatives through its weekly newsletter. The program takes a whole community approach to preparedness. Tools and programs are designed to be inclusive and address the diverse needs of New York City communities.

### **NYC Community Emergency Response Teams (NYC CERT)**

NYC Emergency Management also manages the New York City Community Emergency Response Team program (NYC CERT). The program is made up of local volunteers who are trained to engage their communities in disaster preparedness and emergency response. NYC CERT works to recruit a diverse group of New Yorkers who live across all five boroughs and represent the composition of their community. These volunteers are active in assisting their family, friends, neighbors, and communities before, during, and after emergencies.

The NYC CERT program works with the volunteer leadership of each team to improve the language capacity of their members by recruiting members that speak languages other than English. By having members that speak languages commonly found in their communities, the teams are better able to serve their communities.

The CERT program maintains a database of the language capacity of CERT members who can conduct Ready New York emergency preparedness presentations in languages other than English and assist emergency operations when there is a need for general interpretation services, such as greeting or directions and making sure that residents feel comfortable with an operation. (Note: NYC Emergency Management uses professional interpreters where sensitive or technical interpretation is needed.) CERT members also review the translations of NYC Emergency Management guides and other printed material to ensure cultural and linguistic consistency.

### **Notify NYC**

Notify NYC is the City of New York’s official emergency communications program. Notify NYC continues to ensure that New Yorkers stay informed and connected during critical times. Subscribers have access to messages in 13 different languages, audio format, and American Sign Language (ASL). Non-English speaking subscribers can opt-in to receiving emergency notifications via email, text message, phone, fax, and/or TTY/TDD in their

preferred language by visiting the Notify NYC website or by calling 311. Notify NYC's multilingual messages span a variety of emergency situations, including local and regional mass transit alerts, police and fire activity, major traffic disruptions, planned events, public health and safety notifications, including those regarding COVID-19, public school notifications, utility alerts, weather emergencies alerts, alternate side parking updates, missing person alerts, waterbody advisories, and beach notifications.

The program also has two non-English Twitter handles: @NNYCSpanish and @NNYCChinese, which feature emergency alerts in Spanish and Chinese, respectively. In addition to registering for a Notify NYC account, users can also opt-in to receive short code text messages relating to specific emergencies, including COVID-19, planned events, or localized events of some significance. These free text messages are available by texting a keyword to 692-692. Currently, technology limits the short code text messages to English and Spanish, and Twitter to English, Spanish, and Chinese, but as other languages become available, we will work to add them to the system.

### **Media and ad campaigns**

NYC Emergency Management runs seasonal, general, and hazard-specific multilingual advertising to further promote emergency preparedness in New York City. Since 2009, the agency has worked with the Ad Council to produce general preparedness ads under the Ready New York banner for TV, radio, print, digital, and outdoor media (available in English and Spanish). Additionally, NYC Emergency Management runs ads every September, or National Preparedness Month, to emphasize the importance of preparing for emergencies. NYC Emergency Management also runs the several multi-ethnic, multilingual advertising/marketing techniques and campaigns, including the "Know Your Zone" hurricane awareness campaign, which aims to reach the roughly 3 million New Yorkers living within the city's hurricane evacuation zones. Many of these campaigns include multilingual assets in up to 16 languages.

### **III. Agency language access policy and goals**

During an emergency, NYC Emergency Management works to make certain that agencies involved in the emergency response provide a unified, accurate, and timely message to the public. Considering New York City's ethnic and linguistic diversity, NYC Emergency Management makes every effort to make the information available and accessible to all New Yorkers, regardless of their English proficiency. While the capability of NYC Emergency Management's partner agencies to provide language assistance may vary, we work in tandem with these agencies to support language access to their clients whenever they provide emergency services. The agency continuously evaluates how it interacts with and supports communities in New York City, including populations with limited English proficiency and other vulnerable populations.

While NYC Emergency Management is a coordinating agency and does not provide direct services to New Yorkers, the agency's language access policies are based on the following core principles:

- All public facing programs of the agency should be accessible to New Yorkers with limited English proficiency.
- All essential public facing documents for emergency preparedness should be translated and made available in at least the 10 most commonly spoken languages in New York City.
- Language access should be incorporated and addressed in emergency response through the interagency Language Access Task Force, coordinated by the agency.

#### **IV. Agency language access accomplishments and progress on goals from previous Language Access Implementation Plan**

NYC Emergency Management successfully passed an audit from the Comptroller on its compliance with Local Law 30 in April 2019.

In December 2019, NYC Emergency Management, in collaboration with Mayor's Office of Immigrant Affairs (MOIA), hosted an interagency language access tabletop exercise with Department of Social Services (DSS), Community Affairs Unit (CAU), Department for the Aging (DFTA), Department of Education (DOE), Department of Health and Mental Hygiene (DOHMH), and The American Red Cross (ARC). The goal of the exercise was to socialize the Citywide Emergency Language Access Protocol with interagency Emergency Operations Center liaisons and Language Access Coordinators. Agencies discussed how language access needs of New Yorkers will be addressed during a coastal storm emergency.

The Notify NYC program, NYC's official source for information about emergency alerts and important city services, expanded its multilingual capabilities in 2019. New Yorkers now can subscribe to receive the alerts in 12 languages in addition to English. Notify NYC's website also improved its language accessibility. Currently, the program has 157 templated emergency messages pre-translated in 12 languages. These messages can be quickly updated and issued during an emergency.

During the COVID-19 pandemic, the agency launched short code text messages in Spanish to provide essential updates to the public. About 35,000 people signed up to receive text alerts in Spanish and the agency has issued 255 Spanish text messages to date. The agency also posted updates in Chinese on Twitter @NNYCChinese. At the time of this publication, 247 messages in Chinese have been issued.

<b>Goal</b>	<b>Update</b>
Develop a glossary of commonly used emergency management terms and translate it in 12 languages.	This goal was completed and the glossary was used during the COVID-19 response for the translation of emergency alerts and information.
Develop and test an internal protocol for the translation of Wireless Emergency Alerts (WEAs) into Spanish. Train all necessary staff on the protocol.	This goal was accomplished. In fact, the WEA protocol was used for quick-turnaround translations of short code text messages in Spanish and Twitter posts in Chinese.
Continue to expand the language certification program for staff. In this program, language assessment for written and oral proficiency is offered to all agency multilingual staff to motivate staff to engage with our language access mandate and to assure that language access projects are completed with appropriate and confirmed linguistic proficiency.	All NYC Emergency Management staff was assigned to the COVID-19 response in 2020. Therefore, this program was open only to staff with language access responsibilities. This program will continue to be offered to staff as long as funding for the program is available.
Continue to promote and make the multilingual Notify NYC program more accessible to the communities that need this information through direct engagement at community events.	NYC Emergency Management Watch Command and outreach staff attended multiple public events prior to COVID-19 to register people for the Notify NYC program. This initiative has since then paused due to staff's involvement with the COVID-19 response and transitioning from in-person to virtual programming. As the agency returns to normal operations, this initiative will continue, and will be transitioned to virtual programming for the duration of the pandemic.

## V. People with limited English proficiency population assessment

### US Department of Justice Four Factor Analysis

*Factor 1: examine the number of people with limited English proficiency in the eligible service population*

NYC Emergency Management serves the entire City of New York and conducts demographic assessment through its Geographic Information Systems (GIS) unit at the time of an emergency event. Since emergencies are unpredictable in nature and frequency, assessing the language access needs of affected populations is possible only after the emergency occurs. Since NYC Emergency Management is operational 24/7, the agency conducts demographic assessments after an emergency by obtaining information from the field and pre-existing GIS databases. This information is then shared with the agency responsible to provide services to the affected population.

The agency uses the designated by Local Law 30 languages as a baseline for translation of its essential public outreach materials, signage and at outreach events. In addition to the 10 languages designated by Local Law 30, NYC Emergency Management also translates its public materials and Notify NYC messages in Italian and Yiddish as these two languages are in the top 10 languages spoken in New York City's hurricane evacuation zones.

#### Top 10 Languages Spoken in New York City's Hurricane Evacuation Zones in Addition to English

Language	Speakers
Spanish	746,241
Chinese	313,788
Russian	104,395
Bengali	48,679
Korean	39,673
French Creole	34,504
Yiddish	30,339
Arabic	25,934
Italian	21,974
French	18,823

*Data from the 2014-2018 American Community Survey*

*Factor 2: examine the frequency with which people with limited English proficiency come into contact with the agency*

The agency's Ready New York program teaches New Yorkers about preparedness and is the main way individuals interact with the agency. The program's most popular guide – My Emergency Plan – is widely distributed in all of the agency's public events in all five boroughs. From 2017 until 2019, 67.2% of the guides distributed were in English, 14.9% in

Spanish, 6.8% in Chinese, 2.9% in Haitian Creole, and 8.2% in all other languages (Arabic, Bengali, French, Korean, Urdu, Italian, Russian, Polish, and Yiddish). Note: In 2020, outreach was significantly affected due to COVID-19.

*Factor 3: examine the importance of the benefit, service, information, or encounter to the person with limited English proficiency*

Emergency preparedness outreach and education is an important part of the mission of the agency and the agency is committed to making its public facing programs accessible to all New Yorkers. Therefore, public education guides are translated into the languages required by Local Law 30 plus Italian and Yiddish. During emergencies, the agency coordinates with social service partners for the provision of language access services.

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

The agency has multiple language access contracts with vendors available to provide services 24/7 (as described in *Section IX: Resource Analysis and Planning* of this plan). NYC Emergency Management's total Language Access budget is \$150,000 annually (2022 estimated). During time of emergency, NYC Emergency Management may also use an emergency budget to supplement as needed.

## **VI. Provision of language access services**

### **Translation services**

NYC Emergency Management's translation vendor is aLanguageBank. This vendor is used to translate the agency's public education materials, signage, Notify NYC messages, and during emergency for quick turnaround translations.

NYC Emergency Management's Language Access Coordinator manages this vendor, but members of the Community Engagement Emergency Support Function (ESF) are trained on how to access these services during emergencies. Staff of the Notify NYC program are also trained to work with this vendor for quick turnaround translations of Notify NYC, short code, or WEA messages.

### **Telephonic interpretation services**

NYC Emergency Management's telephonic interpretation vendor is Voiance. The vendor can provide interpretation in 100+ languages. This vendor can be used when a service center or an emergency shelter is open, and the lead agency is unable to provide interpretation in any other way.

NYC Emergency Management's Language Access Coordinator manages the interpretation vendor; however, instructions on how to use telephonic interpretation are included in the coastal storm and service center kits. All staff responsible for language access is trained on the use of this contract through the mandatory online language access training, and in-

person in the Emergency Support Function (ESF) meetings that occur every three weeks, and in the Service Center Support Staff meetings that occur quarterly.

In addition, directions are included in the Community Engagement ESF guide available to all staff in this emergency support function. Just-in-Time training is also provided to service center staff when a service center is opened.

### **In-person interpretation services**

NYC Emergency Management's in-person interpretation vendor is Accurate Communications. NYC Emergency Management provides in-person interpretation for its outreach events and during emergency activations as needed, mainly in support of the lead agency in charge of emergency operations.

Staff responsible for language access are trained on how to access services in-person in the Emergency Support Function meetings, which occur every three weeks, and in the Service Center Support Staff meetings, which occur quarterly. In addition, directions are included in the Community Engagement ESF guide available to all staff in this emergency support function. Just-in-time training is also provided to service center staff when a service center is opened.

Staff who do not have direct language access responsibilities are made aware of this service through NYC Emergency Management's mandatory online language access training.

### **Plain language**

NYC Emergency Management regularly provides language access services for its emergency preparedness events (as described in *Section II: Agency Mission and Background* of this plan).

It is policy that the NYC Emergency Management communications team reviews all commonly distributed documents produced by the agency for consistency, accuracy, and to guarantee the information includes common, everyday words whenever possible. These commonly distributed documents, such as the Ready New York guides, are reviewed by the subject matter expert and the communications team before being published.

Staff responsible for the development of these documents have received plain language training. Documents are reviewed for clarity before translation and edits are made when necessary. All NYC Emergency Management outreach materials use plain language principles:

- Content is written in short sentences.
- Content is broken down with lists and headers.
- Content is written in the active voice.
- Content does not contain jargons.

NYC Emergency Management engages all its staff with the Ready New York program. Since our staff is included in our outreach events, they use translated Ready New York



material on regular basis and are familiar with it. Encouraging New Yorkers to sign up for Notify NYC is also a part of our regular outreach and all staff is trained to talk about the multilingual aspects of the program through the Ready New York staff presenter training and the online Language Access training. Both of these classes are mandatory for all staff to complete within their first six months of hire.

### **Notification of free interpretation signage**

NYC Emergency Management is responsible for coordinating the development of citywide emergency plans. These plans address the need for language assistance during emergency events by identifying lead agencies who are responsible for providing services to affected residents. The lead agency for that emergency operation will assume the responsibility for language assistance based on Local Law 73 and Local Law 30.

NYC Emergency Management is the coordinating agency for emergencies in New York City. As such, the agency maintains the Citywide Language Access Protocol, a document that outlines the steps the City, led by the Mayor's Office of Immigrant Affairs, will take to provide language access during emergencies, and the agencies that have lead roles in language access.

As a coordinating agency, NYC Emergency Management works with lead agencies in each incident to make sure that multilingual signage is available. In addition, NYC Emergency Management's Logistics unit maintains multilingual signage kits for coastal storm shelters and service centers.

Each coastal storm sheltering kit contains "I Speak: Free Interpretation Available" signs, in addition to the NYC Emergency Management-created picture communication boards and other translated signage. In coordination with the Language Access Task Force, additional signage is translated during emergencies that is specific to each incident and reflects the languages of the affected community.

### **Language access in agency communications**

NYC Emergency Management's public education programs conduct preparedness events in languages other than English by request from community organizations. All agency's essential documents for emergency preparedness are available on the agency's website in languages other than English. In addition, NYC Emergency Management has continued to translate Notify NYC alerts in at least the 10 mandated languages of Local Law 30. Common Wireless Emergency Alerts (WEAs) are also pre-translated into Spanish. Notify NYC's website is accessible in 12 languages (in addition to English) through both machine and human translation and the agency continues to work with the NYC Department of Information Technology & Telecommunications (DoITT) to improve the multilingual accessibility of the program.

The Cooling Center Finder – an online tool the agency activates during heat events – is natively translated into the 10 languages mandated by Local Law 30.

In June 2021, the agency launched a monthly Spanish podcast called “Prepárate”, which features different emergency preparedness topics.

### **Emergency response**

During an emergency, NYC Emergency Management works to make certain that agencies involved in the emergency response provide a unified, accurate, and timely message to the public. Considering New York City’s ethnic and linguistic diversity, NYC Emergency Management makes every effort to make sure that the information is available and accessible to all New Yorkers.

While the capability of NYC Emergency Management’s partner agencies to provide language assistance may vary, we work in tandem with these agencies to support language access to their clients whenever they provide emergency services.

The Community Engagement Emergency Support Function (ESF), through the City’s Emergency Operations Center, responsible for coordinating language access during emergencies, is trained on specific signage used for emergencies, the agencies that hold primary responsibility for language access during emergencies, and all other related responsibilities, in meetings that occur every three weeks. In addition, directions are included in the ESF guide available to all staff in this emergency support function.

- The need for language assistance and the provision of language services is monitored by members of the External Affairs, Community Engagement, and Human Services ESFs, and the interagency Language Access Task Force can be activated if the needs of the affected populations exceed the capacity of the responding agencies.
- During an emergency, NYC Emergency Management’s External Affairs ESF regularly provides critical information and updates to 311 operators, and 311 services are available in more than 160 languages.
- In addition, NYC Emergency Management maintains a list of bilingual staff and volunteers. In emergencies, bilingual staff and volunteers can be called upon to review or update simple translations, such as a flyer for a service center, or staff a service center and provide information to people with limited English proficiency.
- The agency has language vendors for translation and interpretation available 24/7.

## **VII. Training**

In 2016, NYC Emergency Management launched an updated mandatory language access online training for employees. The training describes NYC Emergency Management’s language access policies and procedures for each unit, as well as the interagency citywide Language Access Protocol. This training was updated again in March 2018 to include Local Law 30 and Local Law 31. The Training and Exercise team at NYC Emergency Management maintains an online database of staff who has taken the training.

Topics covered in the online training for staff include:

- NYC demographics
- Language access legislation
- Overview of the citywide Language Access Protocol
- Overview of New York City Emergency Management’s Language Access Plan
- Tips on how to work with an interpreter

Members of NYC Emergency Management’s Language Access cabinet train response staff in the use of the Citywide Language Access Protocol and how to access translation and interpretation contracts annually.

Community Engagement staff members, responsible for language access during emergencies, are continuously trained on language access policies during meetings that occur every three weeks.

### **VIII. Record keeping and evaluation**

The Ready New York program maintains an event management database where all community events that require interpretation and/or distribution of material in languages other than English are tracked. After each event, the organizer receives a survey to provide feedback about the event. Concerns raised by the organizer are addressed as soon as they are received by Ready New York staff.

During emergencies, NYC Emergency Management works with the incident lead agency and NYC Emergency Management’s GIS unit to get accurate information about language access needs in the field. NYC Emergency Management does not collect any personal information of people requesting language access services.

NYC Emergency Management maintains situational awareness of language needs that arise in the field and coordinates with responsible service agencies to meet those needs. In addition, after large responses, NYC Emergency Management conducts a “hot wash” with staff where all operations, including language access, are discussed and gaps of services are identified. Then, an after-action report is written and contains recommendations and corrective actions for each incident.

NYC Emergency Management maintains an internal corrective action tracker where all incident recommendations and corrective actions are tracked along with staff responsible for executing each recommendation. Ultimately, it is up to the lead service agency providing language services to keep records of language access services provided during each incident.

### **IX. Resource analysis and planning**

NYC Emergency Management maintains contracts with the following language vendors:

- Translations (aLanguageBank)
- In-person interpretation (Accurate Communication)

- Telephonic interpretation (Voiance)
- Sign Language interpretation (Accurate Communication)
- American Sign Language Video Remote Interpretation (Purple VRI)
- Communication Access Real-Time Captioning (Accurate Communication)

To meet language access needs that arise during emergencies, NYC Emergency Management contracts with vendors that are available to provide services 365 days/year, 24/7 with a two-hour advance notice.

NYC Emergency Management uses these contracts to provide language access for its public outreach programs and when needed, during emergencies.

## **X. Outreach and public awareness of language access services**

NYC Emergency Management's emergency preparedness guides and materials are available in 12 languages (in addition to English) on NYC Emergency Management's website and are also accessible through 311. These guides and materials are distributed through NYC Emergency Management's programs described in this report and at outreach events across the five boroughs. NYC Emergency Management has a dedicated staff member who works closely with immigrant communities in New York City. This staff member schedules and conducts emergency preparedness events for people with limited English proficiency and distributes translated material in these communities.

## **XI. Language access complaints**

Language access complaints can be submitted by emailing [languageaccess@oem.nyc.gov](mailto:languageaccess@oem.nyc.gov) or calling 311. Complaints are monitored and tracked by NYC Emergency Management's language access coordinator and as with any other correspondence, members of NYC Emergency Management's language access cabinet respond to complaints within 14 calendar days of receipt.

## XII. Implementation plan logistics

The NYC Emergency Management Language Access Implementation Protocol shall be reviewed and revised annually, or as necessary. Members of the Language Access cabinet will be responsible for the review and revision of the protocol.

Language access goal	Responsible staff	Deadline
Review existing language access contracts to ensure continuity in service.	Language Access Coordinator and Procurement Staff	Annually
Continue to promote the multilingual Notify NYC program and work with MOIA and DoITT on increasing Notify NYC's website multilingual accessibility.	NYC Emergency Management Language Access Coordinator, NYC Emergency Management's Notify NYC program, MOIA, and DoITT	Dependent on availability of DoITT to make updates
Develop and implement virtual cross-cultural outreach for emergency preparedness.	NYC Emergency Management Community Preparedness Staff	Ongoing
Convene interagency Language Access Task Force partners to discuss updates of the task force's operations based on lessons learned during the COVID-19 response	NYC Emergency Management Language Access Coordinator	End of 2021
Develop an overview for language access during emergencies for language access coordinators in collaboration with MOIA based on lessons learned from the COVID-19 response.	NYC Emergency Management Language Access Coordinator	End of 2021