

**M O I A**

# Local Law 30 Report

For Fiscal Year 2023



**NYC**

Mayor's Office of  
Immigrant Affairs

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# 1. Introduction

The Mayor's Office of Immigrant Affairs (MOIA) and the Mayor's Office of Operations are pleased to submit the annual report on language access to the City Council in compliance with Local Law 30 of 2017. Local Law 30 (LL30) requires that covered city agencies appoint a language access coordinator, develop language access implementation plans, provide telephonic interpretation in at least 100 languages, translate their most commonly distributed documents into the ten designated citywide languages, and post signage about the availability of free interpretation services, among other requirements.

In January 2023, the Council passed Introduction 136-B, which later became Local Law 6 of 2023 (LL6). In accordance with LL6, the annual report's reporting period now aligns with the fiscal year rather than the calendar year. Additionally, the report encompasses details about language services contracts entered by agencies.

The Office of the Language Services Coordinator, based in the Mayor's Office of Operations and MOIA and led by MOIA, is tasked with coordinating City agencies to ensure meaningful access to information and public services for New Yorkers with limited English proficiency (LEP).

In compliance with LL30, MOIA is submitting this annual report to the City Council, which includes an overview of MOIA's implementation efforts and agencies' language access accomplishments in fiscal year 2023 as well as the following mandated components for each agency subject to the requirements of section 23-1102 of the NYC Administrative Code:

- the name of the agency's language access coordinator (LACs), including all titles held by such individual;
- the agency's language access implementation plan (LAIP), which, per LL30's requirements, is updated at least every three years;
- information regarding how members of the public may submit language access complaints, questions, and requests to the agency; and
- data on complaints and requests received pursuant to section 23-301 of the NYC Administrative Code and a description of how complaints and requests are addressed;
- information regarding the outreach conducted by the Office of the Language Services Coordinator and MOIA to assess additional service needs in other languages, pursuant to section 15(c)(3) of the NYC Charter; and
- a copy of the list of the ten designated citywide languages (Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish), created pursuant to section 23-1101 of the NYC Administrative Code, as well as the data relied upon for its creation; and
- details on contracts entered into by the agency during fiscal year 2023 and for which the principal purpose of such contacts was language services.

## 2. Overview of MOIA's LL30 Implementation Efforts

Since LL30's enactment in 2017, MOIA has provided oversight and guidance to support City agencies in understanding their obligations under LL30 and advancing the implementation of language access throughout City government. In fiscal year 2023, MOIA continued to work with City agencies to advance language access by:

- Providing extensive **technical assistance and training** to agencies
  - Advised 30+ agencies on how to implement their language access implementation plans, required by LL30
  - Held multiple online and in-person convenings of Language Access Coordinators (LACs) to share information regarding legislation related to language access, developments in the language services industry, including technology, and best practices from across government.
  - Provided orientation and resources for newly-appointed LACs
  - Engaged with the Digital Equity Working Group (DEWG) to expand inclusion of language access as part of efforts to improve digital access
- Working with agency partners to ensure they have the **resources in place to provide translation and interpretation**
  - Led a series of convenings, with the Mayor's Office of Contract Services (MOCS) and the Department of Citywide Administrative Services (DCAS), to assist agencies with procuring and ensuring the continuity of language services as the centralized contracts under DCAS expired.
  - Provided guidance with Small Business Services on language service providers certified as M/WBEs
  - Supported DCAS with the procurement process for the next generation of citywide contracts for telephonic interpretation and video-remote interpretation
  - Identified community organizations that could assist in providing support in less common languages
  - Advised ACS, OTI, and others on localization of websites and digital communications to expand language access
- Expanding in-house capacity to improve multilingual communications and engagement, for MOIA, Mayoral Offices, and City Hall, through the **Language Access Hub initiative**
  - Onboarded 5 initial Language Access Specialists (Arabic, Bengali, French, Spanish, Russian) and 2 project managers to expand the provision of more quality and community-responsive translation.
  - Delivered 221 translations in 52 languages across 32+ Mayoral Offices and agencies to support multilingual communications for various initiatives, including materials on immigrant rights, environmental justice, air quality, gender equity, and tenant support.
  - Provided 324 interpreters across 154 events. Interpretation was provided in 26 languages.
  - Provided 8823 telephonic interpretation in 60 languages, logging 2152 hours of telephonic interpretation.
  - Supported asylum-seeker response operations by translating materials such as information page, signs, updates, scripts, and emails into 27+ languages.

## 3. Overview of Agency Language Access Accomplishments

### Ongoing improvement on language access

During Fiscal Year 2023, city agencies continued to build out elements of the infrastructure to deliver multilingual communications and manage language services, reflecting the key areas that MOIA has worked with agencies to advance language access. These efforts draw from elements of each agency's Language Access Implementation Plan and evolve as part of citywide efforts to improve equity and efficiency of government operations. Together, the agencies represent varied approaches to reaching audiences with limited English proficiency, which are shared across City government. The broad areas of focus include: strengthening capacity, providing language services, bolstering training, and expanding outreach.

### **Strengthening capacity**

During FY23, agencies took significant steps to expand their internal resources to coordinate around language access and deliver language services. The Department of Health and Mental Hygiene (DOHMH) expanded its Language Services team, bringing on two assistant directors and a new in-house Spanish translator. The Department of Social Services (DSS) shared additional materials and services with 299 providers and expanded its emergency language service contracts. The Administration for Children's Services (ACS) expanded its services to provider agencies and parent advocates. The Office of Administrative Tribunals and Hearings (OATH) expanded its training offerings and multilingual materials, including a new instructional guide for participating in virtual hearings. NYC Aging developed a staff protocol for using translation and interpretation services and ensured that Language Access requirements were included in RFPs and Operating Procedures. Several agencies, including the Department of Buildings (DOB), The Department of Transportation (DOT), and the Department of Records and Information Services (DORIS), addressed the role of bilingual staff to support quality assurance of translated materials. ACS and NYC Emergency Management (NYCEM) expanded language proficiency testing for bilingual staff. DOHMH introduced a mandatory fluency assessment test for staff members willing to provide services in a language other than English. The Department of Sanitation (DSNY) developed a database of translated materials and expanded language services for enforcement agents. DOT developed a dashboard for monitoring language-related requests and delivery of services, which also reduced turnaround times.

### **Providing language services:**

#### **Translation**

- Agencies generally continue to translate their most-commonly-distributed materials into the ten languages designated by LL30. Several agencies, however, regularly translate materials in languages beyond those designated by Local Law 30. DOHMH translates into 13 languages, including both Simplified and Traditional Chinese, Yiddish, and Italian. DOHMH also worked with its in-house team to translate 82 emergency-related documents, 200 regular files, and 103 press releases; furthermore, DOHMH translated an additional 210 projects through its translation vendors. DSS translated 975 new documents and updated 215 other documents in 11 languages.
- During FY23, some agencies expanded language coverage either to better serve key target communities for their agency or as part of ongoing efforts to broaden access to information and services. For example, the Civic Engagement Commission (CEC) translated materials for the participatory budgeting program into languages relevant to the target audiences, utilizing American Community Survey (ACS) data specific to NYC neighborhoods and boroughs. The Taxi and Limousine Commission (TLC) added Hindi and Punjabi to the list of languages into which materials were translated. OATH and Aging added Yiddish to the list of languages for translation. Small Business Services (SBS) produced materials for the Small Business Opportunity Fund in 22 languages. NYCEM continues to deliver emergency messaging through NotifyNYC in 13 languages. Aging produced materials for Health Insurance Information and Counseling Assistance Program (HIICAP) in 15 languages.

- Several agencies reported incorporating a plain language review process as a standard practice. For example, the Civilian Complaint Review Board (CCRB) reported completing a plain language review of essential agency documents. The Mayor’s Office to End Domestic and Gender-Based Violence (ENDGBV) mentioned training an additional 16 staff, including the entire communications team, in plain language and started reviewing their outreach materials and website contents. The Law Department started incorporating plain language review in its material development process.

### **Providing language services: Digital communications**

Language access and digital access both present challenges for agencies as they seek to serve all communities in an equitable manner. As agencies expand the ways in which they communicate with their clients or communities through digital means, whether online or in-person, providing access to content in their preferred language requires directed attention. These efforts must include internal measures to support staff with the tools they need to provide multilingual support. Along these lines,

- ACS launched an initiative to incorporate human translation into its website operations working with its language service provider and a proxy-server solution.
- DOT, DOB, and Housing Preservation and Development (HPD) provide digital signage in the form of message boards and multilingual kiosks to inform and serve clients in walk-in centers.
- Agencies, such as DSNY, CCRB, and ACS, reported making more effective use of their respective intranets to distribute language access guidance and multilingual resources.
- The Office of Technology and Innovation (OTI) launched the MyCity portal to streamline digital access to City services. The first iteration involved a collaboration with ACS to support public engagement with child-related resources. OTI has expanded its technical integration of language support for MyCity with technology and language partners, which will continue in the second phase with SBS in FY24.
- ENDGBV launched its use of a proxy-server solution to expand language access to its website.
- TLC provided a poster with QR codes to access materials in languages other than English.

### **Providing language services: Interpretation**

Agencies continue to rely on telephonic interpretation as a critical resource to provide timely information in languages other than English, especially across a breadth of languages. OTI supported more than 990,000 calls in 86 languages during FY23. Call centers at DSS, ACS, Aging, DOT, and the Department of Youth and Community Development (DYCD) all report delivering language support through contracted services. These agencies have taken additional strides to streamline access for callers with limited English. DSS launched its One Number phone service, which features Interactive Voice Response (IVR) in 12 languages. 311 added five more designated citywide languages (Arabic, Bengali, French, Polish, and Urdu) to its IVR capacity. 311 further supports service improvements through a customer satisfaction survey in all LL30 languages and provides in-language instructional guides on the 311 portal.

Agencies also report bolstering language support for in-person engagements and for partners, including at public hearings (CEC, DSS, Aging) and with contracted providers. CCRB highlighted its expanded capacity to conduct intake and mediation in Spanish. CEC provided 135 language services at 100 poll sites in the November 2022 General Election and 132 language services in the June 2023 Primary Election.

### **Bolstering training**

Staff training serves a critical role in ensuring language access, especially as agencies face staffing gaps and budget shortages. Ensuring that all staff, especially those in public-facing capacities, are aware of protocols and know how to use language resources is key to equitable customer service for New Yorkers, regardless of the language spoken. ACS delivered more than 20 trainings on language access to its staff in FY23. CCRB conducted trainings for 75 new hires. DSS trained 3189 staff members. DORIS developed a new training module on language access obligations. NYPD expanded its training to all members through a new “Language Matters” module. TLC provide language access training to all public-facing staff. DOHMH provided language access training that reached 2255 staff members. Several agencies amplify such in-person trainings by disseminating the resources through their respective intranets. As part of its training efforts, NYCEM led two half-day, all-city emergency preparedness exercises in which the scenario incorporated language barriers and tested language service coordination efforts.

### **Expanding outreach**

Building connections with individuals and communities who face language barriers is a key responsibility of agencies seeking to develop stronger community engagement and trust, as well as to meet the goals of the agency. Many agencies conducted multilingual outreach events and campaigns. For example, the Department of Consumer and Worker Protection (DCWP) conducted 478 outreach events in a language other than English to educate participants about City workplace laws, consumer protection, and free financial counseling and tax preparation. The DOT Street Ambassadors program conducted outreach in specific communities in Polish, Spanish, Haitian Creole, and Albanian.

Many agencies highlighted their partnerships with community organizations and programs to provide in-language programming. Aging’s NY Connects partnered with Women for Afghan Women and Bangladesh American Development Youth Services to disseminate opportunities. ENDGBV partnered with immigrant-serving organizations at each of the Family Justice Centers to promote a welcoming and safe environment. CCRB engaged through other city partners, such as the Department of Education and New York Public Library, as well as groups like the Muslim American Society to promote access to its services. SBS worked with local nonprofits to deliver in-language presentations about opportunities for small businesses. TLC conducted multilingual community outreach at senior community centers, community boards, and events hosted through partnerships with other city agencies and community-based organizations.

Many agencies also conducted outreach with community and ethnic media to reach a broader audience. For example, DCWP’s multilingual, multimedia campaign included advertising through community and ethnic media. Aging released a public services campaign in community and ethnic media outlets and their websites in Mandarin, Urdu, Spanish, and Yiddish.

### **Asylum Seeker operations**

During FY23, New York City faced an unprecedented emergency with the arrival of tens of thousands of migrants. Multiple city agencies including the Mayor’s Office of Immigrant Affairs, the Department of Social Services, Health and Hospitals, Emergency Management, and Housing Preservation and Development contributed extensively towards supporting individuals and families arriving in New York City via various modes of transportation. As the migrant situation endured, the city shifted to establish a central agency to lead and coordinate the response and ensure all the relevant agencies continue to collaborate effectively. In Spring 2023, the Mayor announced the creation of the Office of Asylum Seeker Operations to lead the city’s migrant response in partnership with other sister agencies. The asylum seeker population has been diverse, initially featuring migrants from South and Central America and adding significant new arrivals from West Africa,

among a broad array of source nations. A confluence of international events across the year contributed to the arrival of individuals needing support in Russian, Ukrainian, Haitian Creole, Chinese, and particularly several West African languages, including Wolof and Pulaar.

Agencies involved in the support of new arrivals elevated their language services coordination. NYCEM provided translated materials, signage, and multilingual videos to assist newcomers, including in Wolof, Pulaar, Portuguese, Arabic, and French. Given the constant need for language support, DSS transitioned its service model to providing full-time, on-site interpreters for high-demand languages. During FY23, DSS, including HRA and DHS, brought in about 20,000 shifts of interpreters onsite, in addition to responding to specific client linguistic needs and providing language services in myriad of ways. DOHMH dedicated an additional \$100K for in-person interpretation and respite centers. Agencies sought to work with community organizations that serve African communities, seeking to ensure both language coverage and quality of language services through sufficient training. MOIA provided extensive language support, especially in the early phases of the emergency, as well as part of its ongoing outreach to immigrant communities (see Section 5. Outreach Efforts).



## 4. Agency Language Access Coordinators and 311 Information

As required under LL30, the below charts include:

- the name of each agency’s language access coordinator (LAC) and other titles held by the LACs at each of their respective agencies;
- a description of how members of the public can submit language access complaints, questions, and requests;
- the number of language access complaints and requests for additional language services received in fiscal year 2023; and
- an overview of how complaints and requests were resolved.

Members of the public can submit language access complaints and requests through 311. Complaints may also come through other avenues for customer comments —e.g., in-person or via the agency’s website/social media channels—as reported by the respective agencies.

“*Language access complaints*” refer to instances where an individual stated that they did not receive access to information or services because of a language barrier.

“*Requests for additional language services*” involve requests beyond individual interactions, such as a general need for interpretation at a facility or agency service or materials that should be translated into additional languages to support language access.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Administration for Children's Services (ACS)</b>	1	1	0	0
<b>Language Access Coordinator:</b> Lauren McSwain, Director of Immigrant Services and Language Access				
<b>How members of the public can submit language access complaints/questions/requests:</b> The public can submit language access complaints, questions, and requests through 311 or by reaching out to the ACS Office of Advocacy.				
<b>Complaint resolution process:</b> The Language Access Coordinator follows up by contacting the complainant about the specific issue. For the complaint received by ACS in FY23, the LAC reached out to the caller to inform how to get an interpreter. Additionally, the LAC worked to ensure future callers can be connected directly with interpreters, instead of navigating menus in English.				

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>City Commission on Human Rights (CCHR)</b>	0	0	0	0
<b>Language Access Coordinator:</b> Taiwo Onabanjo (interim), Executive Director of Human Resources				
<b>How members of the public can submit language access complaints/questions/requests:</b> In addition to complaints, questions, or requests made through 311 or directly to staff during the course of Commission programming, members of the public can also email CCHR's team directly at <a href="mailto:policy@cchr.nyc.gov">policy@cchr.nyc.gov</a> . This email can be found on the CCHR website in the same section as the Language Access Plan.				
<b>Complaint resolution process:</b> If CCHR receives a 311 complaint regarding language access, it will be forwarded to the Language Access Coordinator to respond and make the necessary change, as needed.				

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Civic Engagement Commission (CEC)</b>	0	0	0	0
<b>Language Access Coordinator:</b> John P. (JP) Wojciechowski, Language Access Coordinator				

**How members of the public can submit language access complaints/questions/requests:**

The NYC CEC respects and appreciates feedback about its own communications and engagement practices and strives to eliminate the gaps in language access to its information and services. Members of the public can contact the NYC CEC through multiple channels to make a complaint or request additional language services including:

- By mail: 22 Reade Street, 4th Floor, New York, NY 10007
- Email: [info@civicengagement.nyc.gov](mailto:info@civicengagement.nyc.gov)
- Website contact page: [www.nyc.gov/civicengagement](http://www.nyc.gov/civicengagement)
- Telephone (with interpretation available): (646)-769-6020
- Any member of the public can also call 311 to make a complaint about language access at the CEC.

**Complaint resolution process:**

CEC's Language Access Coordinator will track and respond to complaints about language access via the CEC website, email, phone, 311, and/or social media. The LAC will review complaints and update the implementation plan to address emerging issues, as necessary.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Civilian Complaint Review Board (CCRB)	0	0	0	0

**Language Access Coordinator:**

Edwin Peña and Jessica Peña, Senior Investigative Managers

**How members of the public can submit language access complaints/questions/requests:**

The public can submit language access complaints or ask any questions related to language access, by visiting the CCRB's website or by submitting a complaint via 311.

**Complaint resolution process:**

The Language Access Coordinator shall respond to all complaints within 14 days of the CCRB receiving the complaint, in conjunction with the General Counsel's Office.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department for the Aging (DFTA)	0	0	0	0

**Language Access Coordinator:**

Sandy March, Senior Policy Analyst

**How members of the public can submit language access complaints/questions/requests:**

The public can submit language access complaints, questions, and requests by calling 311.

**Complaint resolution process:**

The Correspondence Manager is responsible for ensuring complaints made via 311 are resolved. This includes proper follow-up with appropriate staff and/or supervisor, depending on the nature of the complaint. Additional training will be provided to staff involved in the complaint, if necessary.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of Buildings (DOB)	0	0	0	0

**Language Access Coordinator:**

Lisa Lewis, Director of Customer Service

**How members of the public can submit language access complaints/questions/requests:**

The public can submit language access complaints, questions, and requests by calling 311.

**Complaint resolution process:**

The Language Access Coordinator reviews the complaint and follows-up with the staff member/unit involved.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of City Planning (DCP)	0	0	0	0

**Language Access Coordinator:**

Sok (Soki) Ng, Senior Commissions Operations Specialist

**How members of the public can submit language access complaints/questions/requests:**

Members of the public can submit complaints or requests by calling 311 or by contacting the DCP central office or each of the borough offices by phone (contact phone numbers on the last page of the Language Access Plan)

**Complaint resolution process:**

The Language Access Coordinator shall respond to all complaints within 14 days of the DCP receiving the complaint and copy the Executive Office and the frontline planner (if applicable) on the response to the complaint.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of Citywide Administrative Services (DCAS)	0	0	0	0

**Language Access Coordinator:**

Latesha Parks, Director of Agency Support Services

**How members of the public can submit language access complaints/questions/requests:**

The public may contact the language access coordinator, whose contact information is listed on [DCAS.nyc.gov](http://DCAS.nyc.gov).

**Complaint resolution process:**

311 complaints about language access are directed to the Language Access Coordinator who follows up with complaints.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of Consumer and Worker Protection (DCWP)	0	0	0	0

**Language Access Coordinator:**

Kristen Johnson, Language Access Coordinator

**How members of the public can submit language access complaints/questions/requests:**

The public can submit language access complaints, questions, and requests to DCWP by calling 311 or emailing [LanguageAccess@dcwp.nyc.gov](mailto:LanguageAccess@dcwp.nyc.gov), which will connect them to the LAC.

**Complaint resolution process:**

DCWP's Language Access Coordinator will track and respond to complaints about language access via 311 and social media. The LAC will review complaints and update the implementation plan to address emerging issues, as necessary.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of Correction (DOC)	0	0	0	0

**Language Access Coordinator:**

Garrett Hair, Program Manager; Michael Castelblanco, Director of Emergency Operations

**How members of the public can submit language access complaints/questions/requests:**

Complaints may be submitted through 311. The Office of Constituent and Grievance Services (OCGS) is also accessible to the public through the DOC website, which can be translated into 103 languages. OCGS can be contacted via email and phone.

**Complaint resolution process:**

All language access complaints that are received via the 311 system will be forwarded to the Senior Program Liaison from DOC's Office of Constituent and Grievance Services (OCGS). Once received the complaints will be reviewed for appropriate support and resolution.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of Design and Construction (DDC)	0	0	0	0

**Language Access Coordinator:**

Dalela Harrison, Associate Commissioner/EEO Officer

**How members of the public can submit language access****complaints/questions/requests:**

The public can submit language access complaints, questions, and requests to DDC by calling 311, by emailing [Accessibility@ddc.nyc.gov](mailto:Accessibility@ddc.nyc.gov), or calling (718) 391-1776.

**Complaint resolution process:**

DDC's Language Access Coordinator will track and address inquiries, requests, and complaints.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of Environmental Protection (DEP)	3	1	2	1

**Language Access Coordinator:**

Sara Pecker, Director of Special Projects and Initiatives;  
Eileen Alter and Colin Murphy, Deputy Directors of Special Projects and Initiatives

**How members of the public can submit language access****complaints/questions/requests:**

The public can submit language access complaints, questions, and comments to the agency by contacting 311.

**Complaint resolution process:**

The Language Access Coordinator reviews the complaint and sends it to the appropriate bureau for an explanation of how the complaint was handled and resolved. For the complaint DEP received in FY23 regarding the translation of a document, DEP personnel contacted the complainant, provided explanation that the document was currently being translated. For the request DEP received regarding translation requests from a local police agency (Mount Pleasant PD), DEP Police Officers assisted with interpreting in Spanish victims' answers and events.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of Finance (DOF)	7	7	0	0

**Language Access Coordinator:**

Jacqueline Gold, Assistant Commissioner, External Affairs; John Mulvey, Administrative Staff Analyst

**How members of the public can submit language access****complaints/questions/requests:**

The public can submit language access complaints, questions, and comments to the agency by contacting 311.

**Complaint resolution process:**

Complaints are forwarded to the Language Access Liaison for resolution and/or response. If the customer's request can be accommodated, the liaison does so. If the customer has a complaint about a specific interaction, that is addressed with the applicable manager.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
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<b>Department of Health and Mental Hygiene (DOHMH)</b>	3	3	0	0
<b>Language Access Coordinator:</b> Anton Kuzmin, Assistant Director of Language Access & Research				
<b>How members of the public can submit language access complaints/questions/requests:</b> The public can submit language access complaints, questions, and comments to the agency by contacting 311 or emailing <a href="mailto:languageaccess@health.nyc.gov">languageaccess@health.nyc.gov</a> .				
<b>Complaint resolution process:</b> Complaints about language access are directed to the corresponding divisions and programs. Upon review, the point of contact then reaches out to the constituents within 3 weeks to work towards a resolution.				

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Department of Housing Preservation and Development (HPD)</b>	0	0	0	0
<b>Language Access Coordinator:</b> Robert Turbiak, Director of Operations HR				
<b>How members of the public can submit language access complaints/questions/requests:</b> The public can submit language access complaints, questions, and comments to the agency by contacting 311				
<b>Complaint resolution process:</b> Complaints about language access are directed to the Language Access Coordinator and corresponding entity to work towards a resolution.				

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Department of Parks and Recreation (DPR)</b>	0	0	4	4
<b>Language Access Coordinator:</b> Karina Smith, Assistant Commissioner for Community Outreach & Partnership Development				
<b>How members of the public can submit language access complaints/questions/requests:</b> The public can submit language access complaints, questions, and comments to the agency by contacting 311.				
<b>Complaint resolution process:</b> Complaints are routed to the Language Access Coordinator for swift resolution via written translation or telephonic interpretation.				

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Department of Probation (DOP)</b>	0	0	0	0
<b>Language Access Coordinator:</b> Kenya Lee (interim), Special Assistant, Deputy General Counsel's Office				
<b>How members of the public can submit language access complaints/questions/requests:</b> All events that are open to the public are advertised with the telephone number of the agency's LAC. DOP's website includes information on how to file a complaint through 311.				
<b>Complaint resolution process:</b> The Commissioner's Secretary receives all complaints via 311 and coordinates with the Language Access Coordinator. All 311 complaints are prioritized and followed through to resolution by the LAC.				

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Department of Records and Information Services (DORIS)</b>	0	0	0	0
<b>Language Access Coordinator:</b> Gerald Rosero, Special Assistant to the Commissioner				
<b>How members of the public can submit language access complaints/questions/requests:</b> The public can submit language access complaints, questions, and comments to the agency by contacting 311.				
<b>Complaint resolution process:</b> The Language Access Coordinator receives language access complaints and will investigate the complaints. The LAC will take further necessary action and will notify the constituent.				

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Department of Sanitation (DSNY)</b>	70	60	0	0
<b>Language Access Coordinator:</b> Debra Barreto, Deputy Director, Bureau of Community Affairs; Ryan Merola, Deputy Commissioner, External Affairs				
<b>How members of the public can submit language access complaints/questions/requests:</b> The public may submit inquiries, complaints, or requests for DSNY services directly through 311 or by contacting the Bureau of Community Affairs (BCA) at: customerservice@d sny.nyc.gov, or by calling the Customer Service Unit at (212) 291-1220.				



**Complaint resolution process:**

The complaints DSNY received in FY23 were received mainly through DSNY social media accounts and were addressed by either calling the customer in their preferred language, replying via social media in their preferred language, or responding to incoming messages in their preferred language.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of Social Services (DSS)/ Human Resources Administration (HRA)/ Department of Homeless Services (DHS)	95	46	1	0

**Language Access Coordinator:**

Cheryl Wertz, Director of Language Access; Carolyn Robledo, Assistant Director of Language Access

**How members of the public can submit language access complaints/questions/requests:**

The public can submit language access complaints, questions, or requests in any of the following ways:

- Call 311
- Call Infoline at 718-577-1399
- Call the DHS Ombudsman Unit at 1-800-994-6494
- Speak to the Director at any walk-in sites or residential locations
- Click on "contact us" at [nyc.gov/hra](http://nyc.gov/hra) or [nyc.gov/dhs](http://nyc.gov/dhs)
- Email the Office of Refugee and Immigrant Affairs (ORIA) at [oria@dss.nyc.gov](mailto:oria@dss.nyc.gov)

**Complaint resolution process:**

If the complaint is solely regarding language services, the complaint is routed to the Office of Refugee and Immigrant Affairs (ORIA). ORIA investigates, addresses the concern and reports back to the client. If the complaint involves a benefits issue in addition to the language access complaint, ORIA investigates the language access element and the appropriate program area investigates the benefits concern. Both programs will report their findings to the client.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of Transportation (DOT)	0	0	2	0

**Language Access Coordinator:**

Moussa Kouyate, Associate Director, Public Data

**How members of the public can submit language access complaints/questions/requests:**

The public can submit language access complaints, questions, and comments by submitting a webform to the "Contact the Commissioner" page on the DOT website, or by calling 311.

**Complaint resolution process:**

Language access complaints are processed in DOT's Response Tracking System (ARTS). The complaints are reviewed and translated into English, assigned to operational group for a review. Once completed, a written response is translated and sent to the customer.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of Veterans' Services (DVS)	0	0	0	0

**Language Access Coordinator:**

Curtis Dorval, Digital Communications Manager

**How members of the public can submit language access complaints/questions/requests:**

The public can file language access complaints via 311, the "Contact Us" page on the agency's website, email: info@veterans.nyc.gov, the agency's main phone line, or directly to an outreach coordinator in the field.

**Complaint resolution process:**

The Language Access Coordinator will address inquiries, requests, and complaints as appropriate.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Department of Youth & Community Development (DYCD)	0	0	0	0

**Language Access Coordinator:**

Andrew Miller, Senior Director, Intergovernmental Affairs, EEO Counselor

**How members of the public can submit language access complaints/questions/requests:**

Members of the public may make complaints concerning Language Access through 311, Community Connect, the DYCD Commissioner's office or directly through the Language Access Coordinator.

**Complaint resolution process:**

The Language Access Coordinator is responsible for keeping a log of all complaints and ensuring that all are addressed in a timely fashion.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Fire Department (FDNY)	0	0	0	0

**Language Access Coordinator:**

Steve Ertrachter, Executive Director of Licensing; Aja Cox, Administrative Staff Analyst

**How members of the public can submit language access complaints/questions/requests:**

A language access complaint can be made by calling 311 and submitting an official request or complaint.

**Complaint resolution process:**

311 calls are routed to the FDNY Correspondence Office or FDNY Business Support. FDNY Correspondence Office or Business Support then refers the case to the respective unit and if it is a language access issue, the unit will attempt to resolve the complaint. The language access coordinator's team has developed a plan to meet regularly with the Correspondence Office and FDNY Business Support to review and address all language access complaints.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Landmarks Preservation Commission (LPC)	0	0	0	0

**Language Access Coordinator:**

Courtney Clark Metakis, Director of Communications

**How members of the public can submit language access complaints/questions/requests:**

The public can email the agency at [access@lpc.nyc.gov](mailto:access@lpc.nyc.gov) or call 311. LPC has a dedicated email for language access and the public information line would handle any telephone complaints. This information is also listed on the agency's website.

**Complaint resolution process:**

Complaints are directed to the Language Access Coordinator, and the LAC responds to them.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Law Department	0	0	0	0

**Language Access Coordinator:**

Karlyne Fequiere, Chief Diversity & EEO Officer

**How members of the public can submit language access complaints/questions/requests:**

The public can submit language access complaints, questions, and requests by contacting the agency LAC at [languageaccess@law.nyc.gov](mailto:languageaccess@law.nyc.gov) or by directing their submissions via NYC311.

**Complaint resolution process:**

The Language Access Coordinator determines best way to resolve complaint, if there is a resolution, then issue notice to appropriate entities to make changes. Outreach and follow up to the complainant is made, if appropriate.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
Mayor's Office	1	1	0	0

<p><b>Language Access Coordinator:</b> Kenneth Lo, Senior Advisor, Language Access</p>
<p><b>How members of the public can submit language access complaints/questions/requests:</b> Any member of the public can call 311 to make a complaint about language access at units of the Mayor’s Office. Members of the public can also contact the Mayor’s Office of Immigrant Affairs (MOIA) through multiple channels to make a complaint or request additional language services. MOIA has bilingual staff and telephonic interpretation to support direct contact. Telephone (with interpretation): (212)788-7654 Email: askmoia@cityhall.nyc.gov Website: <a href="https://www1.nyc.gov/site/immigrants/contact/contact.page">https://www1.nyc.gov/site/immigrants/contact/contact.page</a></p>
<p><b>Complaint resolution process:</b> MOIA receives copies of 311 language access complaints labeled as a language access issue wherein we reach out to the appropriate offices within 14 days of receipt to check on resolution and any appropriate next steps. For the complaint MOIA received in FY23, MOIA followed up with the appropriate Mayoral Office, which determined that the complaint was about an organization that does not contract with the Office.</p>

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Mayor's Office of Media &amp; Entertainment (MOME)</b>	0	0	0	0
<p><b>Language Access Coordinator:</b> Karla Cordero, Chief Operating Officer (7/2022 - 5/2023); Lori Barrett-Peterson, General Counsel (6/2023 - Current)</p>				
<p><b>How members of the public can submit language access complaints/questions/requests:</b> The public can submit language access complaints, questions, and requests to the agency by contacting 311.</p>				
<p><b>Complaint resolution process:</b> The Language Access Coordinator or Intergovernmental staff would provide a response usually within a few days but not later than two weeks.</p>				

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Mayor's Office to End Domestic and Gender-Based Violence (ENDGBV)</b>	0	0	0	0
<p><b>Language Access Coordinator:</b> Sara Gonzalez, Senior Policy Advisor</p>				

**How members of the public can submit language access complaints/questions/requests:**

Members of the public can submit language access complaints, questions and requests through the agency using the language access email address (LanguageAccess@endgbv.nyc.gov), through 311, or by speaking with a member of the ENDGBV Administrative team at each Family Justice Center.

**Complaint resolution process:**

Every language access complaint via 311 or other channel is responded to directly by the language access coordinator to the complaining party. Each complaint is assessed on whether it is a structural or individual issue and solutions are planned accordingly.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Emergency Management (NYCEM)</b>	0	0	0	0

**Language Access Coordinator:**

Iskra Killgore, Assistant Commissioner, Community Engagement

**How members of the public can submit language access complaints/questions/requests:**

Language access complaints can be filed by emailing languageaccess@oem.nyc.gov or calling 311.

**Complaint resolution process:**

The Language Access Coordinator responds to complaints within 14 days of receipt.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>New York City Police Department (NYPD)</b>	43	13	0	0

**Language Access Coordinator:**

Wendy Garcia, Deputy Commissioner, Equity and Inclusion; Aristy Dinorah, Assistant Commissioner; Luis Lerebours, Commanding Officer, Reasonable Accommodation Unit

**How members of the public can submit language access complaints/questions/requests:**

Public complaints regarding language access are received through 911, 311, the Civilian Complaint Review Board (CCRB), or directly to the NYPD Internal Affairs Bureau.

**Complaint resolution process:**

All complaints are handled by the Internal Affairs Bureau, who maintains responsibility for intake and follow-up of the complaints.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
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<b>Office of Administrative Trials and Hearings (OATH)</b>	0	0	0	0
<b>Language Access Coordinator:</b> Marisa Senigo, Deputy Commissioner for Public Affairs and Communications				
<b>How members of the public can submit language access complaints/questions/requests:</b> the public can submit language access complaints, questions and requests through 311 or by submitting this contact the Commissioner form and choosing "Language Access Inquiry/Complaint" on the Message Topic dropdown menu.				
<b>Complaint resolution process:</b> OATH translates the complaint into English, drafts the response, has the response rush-translated, and then emails the response to the complainant.				

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Office of Chief Medical Examiner (OCME)</b>	0	0	0	0
<b>Language Access Coordinator:</b> Alison Nixon, Agency Attorney				
<b>How members of the public can submit language access complaints/questions/requests:</b> Members of the public can submit complaints or requests for language access services by calling 311.				
<b>Complaint resolution process:</b> OCME receives email notification of any filed 311 complaints or requests from the Mayor's Office. This 311-email inbox is monitored by OCME's Director of Public Affairs. If a complaint or request for language access services was filed through 311, the Director of Public Affairs would notify OCME's Language Access Coordinator. The complaint or request would then be handled accordingly.				

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Office of Technology and Innovation (OTI)</b>	0	0	0	0
<b>Language Access Coordinator:</b> Rachel Alba, Deputy EEO Director; Michael Hutchinson, 311 Contracts and Finance Director				

**How members of the public can submit language access complaints/questions/requests:**

311 can receive complaints, questions and requests pertaining to language access from the public via several of its channels. A customer may choose to self-serve on several of these channels (311 Online, social media, and mobile) or may call 311 directly to communicate the question, complaint, or request. The link to self-serve via 311 Online is <https://portal.311.nyc.gov/submit-feedback>

**Complaint resolution process:**

All verified language access complaints are investigated to determine root cause and to the extent possible, the customer who made the complaint is contacted to obtain feedback to ensure the complaint is remedied appropriately. MOIA receives copies of all verified complaints and the remedy for each.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Small Business Services (SBS)</b>	0	0	0	0

**Language Access Coordinator:**

Michael Silver, Senior Policy Advisor

**How members of the public can submit language access complaints/questions/requests:**

The public can submit complaints via 311 and other inquiries through its website via “contact us” portal.

**Complaint resolution process:**

The Language Access Coordinator will track and respond to complaints about language access.

Agency Name	Total Complaints	Complaints from 311	Total Requests	Requests from 311
<b>Taxi and Limousine Commission (TLC)</b>	22	0	8	0

**Language Access Coordinator:**

Jinsuk Moon, Language Access Coordinator

**How members of the public can submit language access complaints/questions/requests:**

The public can submit language access complaints, questions, and requests to the agency via 311 or write to the Language Access Coordinator at [tlcexternalaffairs@tlc.nyc.gov](mailto:tlcexternalaffairs@tlc.nyc.gov).

**Complaint resolution process:**

All complaints are sent to the Language Access Coordinator who resolves it with the customer.

## 5. Outreach Efforts

LL30 requires that the Office of the Language Services Coordinator, in consultation with MOIA, perform outreach in neighborhoods with a significant number of residents who do not speak LL30's ten designated Citywide languages to understand the needs of these communities. This section describes MOIA's efforts in fiscal year 2023 to engage with immigrant communities that speak languages beyond the ten LL30 languages to disseminate critical information, connect immigrants to City services, and to better understand community needs.

Outreach to immigrant communities, including newly arrived and hard-to-reach communities, has been a critical focus of MOIA's work. Working closely with community partners and City agencies, MOIA uses multiple channels to provide information to the public about City services, policies that impact immigrants in New York, and other resources. While MOIA conducts outreach and education to speakers of LL30 languages, staff also regularly works with communities that speak languages other than the LL30 languages, disseminating critical information into non-LL30 languages, and organizing events so that these communities can engage directly with the City.

In FY23, MOIA translated materials into 52 languages. These materials included resources on immigrant rights, environmental justice, air quality, gender equity, and tenant support. MOIA also reached communities that speak languages other than the ten LL30 languages.

### **Immigrant Rights Workshops (IRW)**

MOIA continued to conduct Immigrant Rights Workshops (formerly "Know Your Rights" forums) in various communities across the City. The workshop educates the community on how to navigate city services and resources, recent executive orders and changes to federal immigration policy, and workers' rights and worksite enforcement actions. From December 2022 to November 2023, the IRW presentations were facilitated in 11 languages, including Arabic, Chinese (Mandarin and Cantonese), French, Haitian Creole, Korean, Polish, Russian, Spanish, Turkish, and Ukrainian.

### **Rapid Response**

In response to the increase of recently arrived immigrants in search of safety and a better life, MOIA led the operation of the Navigation Center System. Officially launched in September 2022, the Navigation Center served as a central location for recently arrived immigrants to receive case management services and to connect to the most immediate city resources. In FY23, the languages served were Arabic, Mandarin Chinese, French, Haitian Creole, Hindi, Portuguese, Russian, Spanish, Ukrainian, and Venezuelan Sign Language. More languages were served as the demographic of recently arrived immigrants changed at the end of FY23.

### **AskMOIA Hotline**

AskMOIA Hotline is another key channel for engaging with immigrant communities, understanding their needs, and connecting them to City services. From December 2022 to November 2023, the AskMOIA Hotline and email inbox responded to about 4,500 calls and 1,175 emails. AskMOIA Hotline, in 13 languages, which includes Arabic, Bengali, Chinese (Cantonese and Mandarin), French, Haitian Creole, Japanese, Portuguese, Russian, Spanish, Ukrainian, Uzbek, and Wolof.

### **NYC Care**



In August 2019, NYC Care launched as a key part of the largest and most comprehensive plan in the nation to ensure that uninsured New Yorkers have access to quality and affordable health care, regardless of immigration status or ability to pay. NYC Care guarantees low- and no-cost health care services to New Yorkers who do not qualify for or cannot afford health insurance. Given the barriers to healthcare access that exist for immigrant New Yorkers, MOIA partnered with H+H to enlist the support of 22 trusted CBOs in community outreach.

### **Outreach support**

MOIA's outreach team plays a crucial role in increasing access to City resources and services for immigrant New York City residents. MOIA's outreach team also works with community-based organizations so that newly arrived immigrants receive assistance by providing additional information for City programs. On FY23, the outreach team supported 357 events in 31 languages, including Quechua and Wolof.

## 6. Agency Expenditure Report on Language Services

Local Law 6 of 2023 (LL6) requires the annual report to include the language services contracts entered into by the agency during the preceding fiscal year. As required under LL6, the below charts include:

- whether the vendor is a community-based organization;
- means of procurement;
- the principal purpose of each contract;
- to the extent practicable, the languages the service provided;
- the period of service;
- the total dollar value of the contract;
- the total dollar value of payment during fiscal year 2023.

The definitions of procurement methods can be viewed on the [NYC BuyWise website](#).

Agency	Vendor Name	Is this vendor a community-based organization?	Means of procurement	Principal purpose of the contract	Language(s) the service provided	Period of service	Total dollar value of the contract	Total dollar value of payments during FY23
ACS	Accurate Communications	No	DCAS Task Order	In-person interpretation; Video remote interpretation (VRI)	35+ languages	10/01/21 - 06/30/25	\$ 7,489,500.00	\$ 1,196,174.99
ACS	Accurate Communications	No	DCAS Task Order	Onsite Spanish interpretation and Language Certification Programs	<b>OnSite Interpretation:</b> Spanish; <b>Language Certification Program:</b> Spanish, French, Croatian, Russian, Tamil, Portuguese, Cantonese, Haitian Creole, Urdu, Yoruba, Hebrew, Hindi, Malayalam, Akan, Bengali, Vietnamese	10/01/21 - 06/30/25	\$ 1,548,651.76	\$ 142,920.74
ACS	Language Line Solution	No	DCAS Task Order	Telephonic Interpretation	200+ languages	6/26/21 - 6/30/25	\$ 4,075,000.00	\$ 869,312.49
ACS	Language Line Solution	No	DCAS Task Order	Translation	35 languages	9/1/21 - 6/30/25	\$ 1,040,000.00	\$ 199,608.81
CCHR	Accurate Communications	No	Small Purchase	ASL, Communication Access Realtime Translation (CART)	N/A	5/8/2023	\$ 500.00	\$ 300.00
CCHR	B&N Interpreting	No	Small Purchase	In-person and virtual interpretation	ASL, Bengali, Japanese	12/22 - 6/23	\$ 5,600.00	\$ 5,250.00
CCHR	Langalo	No	Small Purchase	Translation	Spanish, Chinese, Russian, Bengali, Haitian, Arabic, Urdu, French, Polish	9/22 - 5/23		
CCHR	LM Language Service	No	Small Purchase	Telephonic interpretation	Various languages from Arabic to Urdu	7/22 - 6/23	\$ 11,400.00	\$ 8,345.70
CCRB	Language Line Solution	No	Small Purchase	Telephonic Interpretation	23 languages	7/1/22 - 6/30/23	\$ 11,372.90	\$ 11,372.90
CCRB	LIS Group	No	Small Purchase	In-person, virtual Interpretation	Fulani, Haitian Creole, Mandarin, Russian, Spanish	7/1/22 - 6/30/23	\$ 6,200.00	\$ 6,140.00
CCRB	LIS Solutions	No	Small Purchase	Translation	Spanish, Simplified Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, Polish	7/1/22 - 6/30/23	\$ 12,809.94	\$ 12,809.94
CEC	ALanguageBank	No	Micropurchase	Translation, On-Site Interpretation	Arabic, Bengali, Chinese (Simplified, traditional), French, Haitian Creole, Italian, Korean, Polish, Russian, Urdu, Yiddish	9/26/22, 10/6/22, 10/17/22, 10/31/22, 11/30/22, 12/2/22	\$ 54,769.00	\$ 54,769.00
CEC	Eriksen Translation	No	MWBE Small purchase	Translation	Arabic, Bengali, Chinese (Simplified, traditional), French, Haitian Creole, Italian, Korean, Polish, Russian, Urdu, Yiddish, Greek, Albanian, Tagalog,	7/20/22 - 6/30/24	\$ 100,000.00	\$ 24,151.00
CEC	Language Line Solution	No	Micropurchase	Telephonic Interpretation	200+ languages	7/1/22 - 6/30/23	\$ 10,000.00	\$ 43.00

CEC	Smartling	No	Micropurchase	Website Localization / Translation	Arabic, Bengali, Chinese (Simplified, traditional), French, Haitian Creole, Italian, Korean, Polish, Russian, Urdu, Yiddish	7/1/22 - 6/30/23	\$ 15,000.00	\$ 15,000.00
CEC	The Big Word	No	MWBE	On-site Interpretation for Poll Site Language Assistance Program	Arabic, Bengali, Chinese (Cantonese, Mandarin), French, Haitian Creole, Italian, Korean, Polish, Russian, Urdu, Yiddish	7/1/22- 6/30/2023	\$ 833,189.73	\$ 833,189.73
DCAS	Geneva Worldwide	No	Small Purchase	Translation	Spanish, French, Chinese Simplified	4/22/22 - 4/21/23	\$ 6,250.00	\$ 123.00
DCAS	Geneva Worldwide	No	Small Purchase	Translation	Arabic, Bengali, Chinese Traditional, Chinese Simplified, French, Haitian, Korean, Polish, Russian, Spanish, Urdu	4/22/22 - 4/21/23	\$ 6,250.00	\$ 586.00
DCAS	Geneva Worldwide	No	Small Purchase	Translation	Spanish, Polish	4/22/22 - 4/21/23	\$ 6,250.00	\$ 89.28
DCAS	Vanguard	No	Small Purchase	Translation	Arabic, Bengali, Chinese Traditional, Chinese Simplified, French, Haitian, Korean, Polish, Russian, Spanish, Urdu	7/1/22 - 6/30/23	\$ 5,000.00	\$ 665.00
DCWP	Geneva Worldwide	No	Micropurchase	Transcription	English, Spanish, Chinese, Bengali	7/1/2022	\$ 2,597.54	\$ 2,597.54
DCWP	Geneva Worldwide	No	Micropurchase	Transcription	English, Spanish	12/16/2022	\$ 1,080.00	\$ 1,080.00
DCWP	Geneva Worldwide	No	Micropurchase	Transcription	English, Spanish	4/7/2023	\$ 2,151.00	\$ 2,151.00
DCWP	Language Line Solution	No	DCAS Task Order	Translation	Spanish	7/8/2022	\$ 54.56	\$ 54.56
DCWP	Language Line Solution	No	DCAS Task Order	Translation	Chinese, Korean, Russian, Spanish	7/15/2022	\$ 161.75	\$ 161.75
DCWP	Language Line Solution	No	Micropurchase	Translation	Spanish	8/4/2022	\$ 217.12	\$ 217.12
DCWP	Language Line Solution	No	Micropurchase	Translation	Korean	9/1/2022	\$ 33.60	N/A
DCWP	Language Line Solution	No	Negotiated acquisition	Telephonic Interpretation	200+ languages	7/31/22 - 6/5/23	\$ 30,000.00	\$ 5,568.34
DCWP	Language Line Solution	No	Requirement Contracts	Translation	Arabic, Bengali, Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu	9/7/22 - 6/27/23	\$ 75,000.00	\$ 37,159.43
DDC	Language Line Solution	No	Small Purchase	Translation	Spanish, Chinese	7/1/22 - 3/1/23	\$ 435.10	\$ 435.10
DEP	Eriksen Translation	No	MWBE	Secondary review	Arabic, Bengali, Chinese (Simplified), French, Haitian Creole, Italian, Korean, Polish, Russian, Spanish, Urdu, Yiddish (NYC)	7/1/22 - 6/30/23	\$ 6,000.00	\$ 8,533.94
DEP	Geneva Worldwide	No	DCAS Task Order	Translation	26 languages	7/1/22 - 6/30/23	\$ 2,000.00	\$ 13,195.30
DEP	Voiance Language Services, LLC	No	DCAS Task Order	Telephonic Interpretation	Mandarin, Spanish, Cantonese, Bengali, Fuzhou, Russian, French	7/1/22 - 6/30/23	\$ 1,000.00	\$ 739.10
DFTA	Birch Language Solutions	No	Purchase Order	Translation	Spanish, Russian, Chinese	N/A	N/A	\$ 310.00

DFTA	CQ Fluency	No	Purchase Order	Translation	Spanish, Russian, Arabic, Haitian Creole, Polish, Bengali, Korean, French, Urdu, Japanese, Chinese	N/A	N/A	\$ 1,351.89
DFTA	Language Line Solution	No	Small Purchase	Telephonic Interpretation	43 languages	1/1/23 - 12/31/25	\$ 99,000.00	\$ 31,096.92
DFTA	LM Language Service	No	Purchase Order	Translation	Spanish, Russian, Arabic, Haitian Creole, Polish, Bengali, Korean, French, Urdu, Chinese	7/17/23 - 12/31/25	\$ 99,000.00	\$ 14,065.59
DFTA	Nova Languages	No	Purchase Order	Translation	Spanish, Russian, Arabic, Haitian Creole, Polish, Bengali, Korean, French, Urdu, Japanese, Chinese	N/A	N/A	\$ 690.00
DOB	Geneva Worldwide	No	DCAS Task Order	Translation	Arabic, Bangla, Chinese (simplified Cantonese), French, Haitian-Creole, Italian, Korean, Polish, Spanish, Urdu, Nepali, Tibetan, Greek, Punjabi and Yiddish	12/7/20 - 6/30/23	\$ 25,000.00	\$ 206.00
DOB	Voiance Language Services, LLC	No	DCAS Task Order	Telephonic Interpretation	Arabic, Bangla, Chinese (simplified Cantonese), French, Haitian-Creole, Italian, Korean, Polish, Spanish, Urdu, and Yiddish.	7/1/20 - 6/30/23	\$ 16,500.00	\$ 2,754.00
DOF	Language Line Solution	No	DCAS Task Order	Interpretation	Arabic, Urdu, Russian, French, Spanish, Chinese (Simplified), Polish, Bengali, Korean, Haitian Creole	7/1/22 - 6/30/23	\$ 200,000.00	\$ 103,647.00
DOF	Language Line Solution	No	DCAS Task Order	Translation	Arabic, Urdu, Russian, French, Spanish, Chinese (Simplified), Polish, Bengali, Korean, Haitian Creole	7/1/22 - 6/30/23	\$ 200,000.00	\$ 95,122.00
DOHMH	Accurate Communications	No	MWBE	In-person interpretation; Video remote interpretation (VRI)	173 languages (including LL30 languages)	7/1/18 - 6/30/24	\$ 1,865,348.00	\$ 242,829.50
DOHMH	Eriksen Translation	No	MWBE	Language testing	Amharic, Arabic, Armenian, Bengali, Burmese, Cambodian, Mandarin Chinese, Cantonese Chinese, Farsi, French, German, Greek, Gujarati, Haitian Creole, Hebrew, Hindi, Hmong, Italian, Japanese, Korean, Lao, Polish, Portuguese (Brazil), Portuguese (Portugal), Punjabi (Eastern), Punjabi (Western), Russian, Somali, Spanish, Tagalog, Thai, Urdu, Vietnamese	7/1/22 - 6/30/23	\$ 19,910.00	\$ 11,550.00
DOHMH	Geneva Worldwide	No	DCAS Task Order	In-person interpretation; Video remote interpretation (VRI)	100+ languages	7/1/19 - 6/30/24	\$ 1,580,352.54	\$ 55,954.32

DOHMH	Human Touch Translations	No	MWBE	Translation; Translation review	200+ languages	12/1/20 - 11/30/23	\$ 500,000.00	\$ 247,317.00
DOHMH	Language Line Solution	No	DCAS Task Order	Telephonic interpretation	200+ languages	6/3/18 - 6/2/24	\$ 1,885,198.00	\$ 130,977.57
DOHMH	Language Line Solution	No	DCAS Task Order	Translation	100+ languages	6/3/18 - 6/2/24	\$ 2,275,800.00	\$ 442,782.97
DOP	Accurate Communications	No	MWBE Small purchase	In-person interpretation	Mandarin, Spanish	8/11/22 - 3/17/23	\$ 1,225.00	\$ 1,225.00
DOP	Ebony Marketing Systems	No	MWBE Small purchase	Translation	Language breakdown unspecified	9/23/2022	\$ 625.00	\$ 625.00
DOP	Ebony Marketing Systems	No	MWBE Small purchase	Translation	Bengali, Haitian Creole, Polish, Russian, Chinese (Simplified), Spanish, Urdu	5/15/2023	\$ 970.00	\$ 970.00
DOP	Language Line Solution	No	DCAS Task Order	Telephonic interpretation	43+ languages	7/1/22 - 6/30/23	\$ 202,599.64	\$ 63,799.96
DORIS	CQ Fluency	No	MWBE Small purchase	Translation; In-person interpretation; Telephonic interpretation	Spanish, Chinese, Russian, Korean, Bengali, Haitian Creole, Arabic, Urdu, French, Polish		\$ 20,000.00	
DOT	Accurate Communications	No	DCAS Task Order	Interpretation; Communication Access Realtime Translation (CART)	CART reporter listens to speech during an event/meeting and using captioning software instantaneously translate all the speech to text	5/1/22 - 4/30/24	\$ 16,000.00	\$ 4,446.80
DOT	Accurate Communications	No	DCAS Task Order	Interpretation	Spanish, Russian, Arabic, Haitian Creole, Polish, Bengali, Korean, French, Urdu, Chinese, Yiddish, Italian, Hindi, Japanese, Albanian	11/1/19- 6/30/25	\$ 257,852.00	\$ 100,597.70
DOT	GV Solutions	No	MWBE Purchase Order	Translation (Third party Review)	Spanish, Russian, Arabic, Haitian Creole, Polish, Bengali, Korean, French, Urdu, Chinese	7/1/22- 6/30/24	\$ 20,000.00	\$ 2,984.24
DOT	Language Line Solution	No	DCAS Task Order	Telephonic Interpretation	Spanish, Russian, Arabic, Haitian Creole, Polish, Bengali, Korean, French, Urdu, Chinese, Hebrew, Hungarian, Italian, Greek, Mandinka, Ukrainian, Hebrew, Swahili	6/03/22 – 6/02/25	\$ 34,749.00	\$ 6,748.15
DOT	Language Line Solution	No	DCAS Task Order	Translation	Spanish, Russian, Arabic, Haitian Creole, Polish, Bengali, Korean, French, Urdu, Chinese, Italian, Greek, Ukrainian, Yiddish, Punjabi, Hindi	6/3/18 – 6/02/25	\$ 560,000.00	\$ 72,513.99
DPR	Accurate Communications	No	DCAS Task Order	In-person & remote interpretation; Communication Access Real-Time Transcription (CART)	100+ languages	7/1/22 – 6/30/23	\$ 15,000.00	\$ 11,723.75
DPR	Language Line Solution	No	DCAS Task Order	Telephonic interpretation; Translation	200+ languages	7/1/22 – 6/30/23	\$ 121,700.00	\$ 87,934.99

DSNY	Eriksen Translation	No	Micropurchase	Translation	Arabic, Bengali, Simplified Chinese, Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu	8/12/22 – 4/17/23	\$ 20,000.00	\$ 19,092.53
DSNY	LM Language Service	No	MWBE Small purchase	Telephonic Interpretation	Arabic, Bengali, Simplified Chinese, Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu	7/1/22 – 6/30/23	\$ 100,000.00	\$ 30.54
DSNY	Voiance Language Services, LLC	No	Micropurchase	Telephonic Interpretation	Arabic, Bengali, Simplified Chinese, Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu	7/31/22 – 6/30/23	\$ 20,000.00	\$ 293.76
DSS	Accurate Communications	No	Small Purchase	Secondary On-site interpretation	Albanian, Bengali, Georgian, Haitian Creole, Hungarian, Korean, Latvian, Polish, Pulaar, Russian, Spanish, Urdu	1/1/22 – 12/31/22	\$ 20,000.00	\$ 3,387.50
DSS	Accurate Communications	No	Small Purchase	Communication Access Realtime Translation (CART)	English	5/1/22 – 6/30/25	\$ 60,000.00	\$ 6,150.00
DSS	Accurate Communications	No	Competitive Procurement	Secondary On-site interpretation	35 languages	7/1/22 – 6/30/26	\$ 200,000.00	\$ 153,530.00
DSS	Accurate Communications	No	Emergency Procurement	Emergency on-site interpretation	Spanish	9/16/22 – 6/30/24	\$ 8,197,988.00	\$ 6,170,321.77
DSS	Eriksen Translation	No	Small Purchase	Translation quality assurance	Arabic, Bengali, Chinese (Traditional and Simplified), French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu	1/7/21 – 6/30/25	\$ 29,040.00	\$ 29,040.00
DSS	Geneva Worldwide	No	Competitive Procurement	On-site Interpretation	28 languages	7/1/18 – 6/30/25	\$ 3,037,600.00	\$ 824,071.26
DSS	Language Line Solution	No	DCAS Task Order	Telephonic Interpretation	200+ languages	6/3/18 – 6/30/25	\$ 17,712,932.00	\$ 4,575,019.60
DSS	Language Line Solution	No	DCAS Task Order	Translation	24 languages	6/3/18 – 6/30/26	\$ 14,778,522.00	\$ 995,283.50
DYCD	Contreras Translation & Interpretation Services	No	MWBE Small Purchase	Translation	Traditional Chinese, Simplified Chinese, Haitian Creole, Korean, Russian, Spanish, Arabic, Bengali, French, Polish, Urdu	7/1/22 - 6/30/23	\$ 30,000.00	\$ 4,121.29
DYCD	Language Line Solution	No	DCAS Task Order	Telephonic Interpretation	Traditional Chinese, Simplified Chinese, Haitian Creole, Korean, Russian, Spanish, Arabic, Bengali, French, Polish, Urdu	7/1/22 - 6/30/23	\$ 15,000.00	\$ 1,156.93
ENDGBV	Accurate Communications	No	Small Purchase	In-person interpretation	ASL, Spanish	7/1/22 – 6/30/23	N/A	\$ 5,737.50
ENDGBV	Language Line Solution	No	DCAS Task Order	Translation	Arabic, Bengali, Chinese (Traditional and Simplified), French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu, Hindi, Vietnamese, Japanese, Tagalog	7/1/22 – 6/30/23	N/A	\$ 499.36

ENDGBV	Smartling	No	Small Purchase	Translation	Arabic, Bengali, Chinese (Traditional and Simplified), French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu	1/10/23 – 1/9/26	\$ 99,000.00	\$ 33,000.00
ENDGBV	Voiance Language Services, LLC	No	Small Purchase	Telephonic Interpretation	40+ languages	7/1/22 – 6/30/23	\$ 75,000.00	\$ 66,676.05
FDNY	Language Line Solution	No	DCAS Task Order	Telephonic Interpretation	200+ languages	6/1/22 – 5/31/25	\$ 156,550.00	\$ 26,597.55
FDNY	Language Line Solution	No	DCAS Task Order	Translation	Spanish, Chinese, Russian, Bengali, Haitian-Creole, Korean, Arabic, Urdu, French, Polish	9/19/19 – 6/2/23	\$ 135,000.00	\$ 27,154.83
HPD	Language Line Solution	No	DCAS Task Order	Telephonic Interpretation	200+ languages	7/1/22 – 6/30/25	\$ 196,000.00	\$ 55,398.88
HPD	Language Line Solution	No	DCAS Task Order	Translation	200+ languages	7/1/22 – 6/30/25	\$ 425,000.00	\$ 55,938.83
LAW	Eiber Translations Inc	No	Purchase Order	Primary vendor for translation and interpretation (live and remote)	31 languages	N/A	\$ 160,000.00	\$ 149,734.75
LAW	Geneva Worldwide	No	Purchase Order/ Amendment	Backup vendor for translation and interpretation (live and remote)	Arabic, Armenian, Bengali, Cantonese, French, Mandarin, Panjabi-Eastern, Portuguese, Russian, Spanish, Ukrainian, Urdu	N/A	\$ 40,000.00	\$ 28,792.02
LAW	Voiance Language Services, LLC	No	Purchase Order	Telephonic Interpretation	21 languages	N/A	\$ 20,000.00	\$ 11,113.23
LPC	Accurate Communications	No	Small Purchase	Translation	200+ languages	7/1/22 – 6/30/23	\$ 4,500.00	\$ -
LPC	Language Line Solution	No	Small Purchase	Telephonic Interpretation	200+ languages	7/1/22 – 6/30/23	\$ 500.00	\$ -
MO	Accurate Communications	No	MWBE Small purchase	In-person interpretation	23 languages	7/1/22 – 6/30/26	\$ 100,020.00	\$ 39,357.50
MO	CQ Fluency	No	MWBE Small purchase	Translation	50 languages	8/1/22 – 12/31/24	\$ 385,000.00	\$ 156,494.09
MO	CQ Fluency	No	Micropurchase	Translation	24 languages	7/1/22 – 7/31/22	\$ 20,000.00	\$ 161,401.28
MO	Eriksen Translation	No	Micropurchase	Language testing	Arabic, Bengali, Chinese – Simplified, Chinese – Traditional, French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu	12/15/22 – 12/14/23	\$ 7,950.00	\$ 5,130.00
MO	Geneva Worldwide	No	DCAS Task Order	Translation	25 languages	1/1/20 – 6/21/24	\$ 264,100.00	\$ 80,254.61
MO	Geneva Worldwide	No	DCAS Task Order	In-person interpretation	Arabic, Bengali, Chinese – Cantonese, Chinese – Mandarin, French, Haitian Creole, Korean, Polish, Punjabi, Russian, Spanish, Tibetan, Ukrainian	1/1/20 – 6/21/24	\$ 179,835.44	\$ 36,363.91
MO	Language Line Solution	No	DCAS Task Order	Telephonic interpretation	200+ languages	7/1/18 – 6/30/25	\$ 150,000.00	\$ 64,508.19
MO	Language Testing International	No	Micropurchase	Language testing	Arabic, Bengali, Chinese – Cantonese, Chinese – Mandarin, French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu	8/10/22 – 8/9/23	\$ 19,935.00	\$ 2,726.00



MO	Smartling	No	Micropurchase	Website proxy	Arabic, Bengali, Chinese – Simplified, French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu	7/18/21 – 7/17/22	\$ 20,000.00	\$ 20,000.00
MOME	Language Line Solution	No	DCAS Task Order	Translation, in-person interpretation, telephonic interpretation, audio-video transcription	200+ languages	7/1/22 – 6/30/23	\$ 20,000.00	\$ -
MOME	Language Line Solution	No	DCAS Task Order	Translation, in-person interpretation, telephonic interpretation, audio-video transcription	200+ languages	9/1/22 – 8/31/24	\$ 200,000.00	\$ 3,716.19
NYC311	Language Line Solution	No	RFP Solicitation	Telephonic interpretation	86 languages	6/3/18 – 6/2/24	\$ 9,294,920.00	\$ 1,736,851.47
NYC311	Language Line Solution	No	RFP Solicitation	Translation	11 languages	6/3/18 – 6/2/24	\$ 102,203.00	\$ 8,999.60
NYCEM	Accurate Communications	No	Small Purchase	Communication Access Realtime Translation (CART)	English	7/1/22 – 6/30/23	\$ 20,000.00	\$ 3,531.75
NYCEM	Accurate Communications	No	MWBE	In-person interpretation	100+ languages	7/1/22 – 6/30/24	\$ 250,000.00	\$ 18,000.00
NYCEM	Language Bank Inc	No	MWBE/Renewal	Translation	200+ languages	7/1/22 – 6/30/24	\$ 250,000.00	\$ 59,694.21
NYCEM	Language Testing International	No	Other – pay per test	Language testing	N/A	N/A	N/A	\$ 3,162.00
NYCEM	Telelanguage/Propio	No	Small Purchase	Telephonic Interpretation	200+ languages	6/2/22 – 6/1/23	\$ 100,000.00	\$ 573.30
NYPD	Accurate Communications	No	Small Purchase	Translation, in-person sign language interpretation, Communication Access Realtime Translation (CART)	N/A	7/1/22 – 6/30/23	\$ 100,000.00	\$ 32,864.28
NYPD	Berlitz Corporation	No	Subscription	Language testing	Arabic, Armenian (Western), Chinese/Mandarin, Cantonese, Czech, Danish, Dutch, English, Farsi/Persian, French (European and Canadian), German, Greek, Haitian Creole, Haitian Creole, Hebrew, Hindi, Hmong, Indonesian/Bahasa, Italian, Japanese, Khmer/Cambodian, Korean, Laotian, Polish, Portuguese (Brazilian), Punjabi, Russian, Slovak, Spanish, Swedish, Tagalog, Thai, Turkish, Vietnamese	1/1/22 – 12/31/23	\$ 300,000.00	\$ 131,940.00
NYPD	Language Line Solution	No	Customer Agreement/Amendment	Telephonic Interpretation	200+ languages	9/1/20 – 8/31/22	\$ 2,100,000.00	\$ 220,087.33
NYPD	Language Line Solution	No	Customer Agreement/Renewal	Telephonic Interpretation	200+ languages	9/1/22 – 8/31/24	\$ 2,900,000.00	\$ 1,285,556.91

OATH	Accurate Communications	No	Small Purchase	Backup in-person interpretation	N/A; service was not used	5/3/23 – 6/30/23	\$ 965.00	\$ -
OATH	Accurate Communications	No	MWBE	In-person interpretation	Mandarin Chinese, Georgian, Spanish, Indonesian, Bengali, Russian, Mixtepec Mixtec	7/1/22 – 6/30/25	\$ 50,775.00	\$ 6,132.50
OATH	Geneva Worldwide	No	Small Purchase	Transcription	English	7/1/22 – 6/30/22	\$ 20,000.00	\$ 16,513.50
OATH	Geneva Worldwide	No	Small Purchase	Transcription	English	7/1/22 – 6/30/23	\$ 4,000.00	\$ 1,668.00
OATH	Geneva Worldwide	No	Small Purchase	Transcription	English	7/1/22 – 6/30/23	\$ 20,000.00	\$ 10,053.50
OATH	Geneva Worldwide	No	Negotiated acquisition	Transcription services (Legal and Medical)	English	7/1/22 – 6/30/23	\$ 1,949,083.50	\$ 1,911,244.92
OATH	Language Line Solution	No	DCAS Task Order	Telephonic Interpretation	24 languages	6/3/22 – 6/2/25	\$ 198,720.00	\$ 73,245.40
OATH	Language Line Solution	No	DCAS Task Order	Telephonic Interpretation	22 languages	6/3/22 – 6/2/25	\$ 56,801.00	\$ 6,652.43
OATH	Language Line Solution	No	Small Purchase	Telephonic Interpretation	Mandarin, Arabic, Tibetan, Spanish, Punjabi, Bengali, Uzbek, Urdu, French, Bahasa, Haitian Creole, Turkish, Russian, Cantonese	6/3/22 – 6/2/25	\$ 13,027.00	\$ 3,138.46
OATH	Lex Reporting Service	No	Small Purchase	Court reporting, transcription	English	7/1/22 – 6/30/23	\$ 2,000.00	\$ -
OATH	LM Language Service	No	Small Purchase	Backup telephonic interpretation	Russian, Georgian, Spanish, Bengali, Arabic, Urdu	6/3/22 – 6/2/25	\$ 3,383.00	\$ 1,097.16
OATH	LM Language Service	No	MWBE	Translation	Spanish, Arabic, Bengali, Chinese, French, Haitian, Korean, Polish, Russian, Urdu, Yiddish, Hebrew, Tibetan, Thai, Ukrainian, Punjabi, Japanese, Georgian, Albanian	6/3/22 – 6/2/25	\$ 78,931.00	\$ 9,199.44
OATH	LM Language Service	No	MWBE	Translation	Spanish, Arabic, Bengali, Chinese, French, Haitian, Korean, Polish, Russian, Urdu, Yiddish, Hebrew, Tibetan, Thai	8/25/22 – 8/24/23	\$ 307,678.00	\$ 75,683.57
OATH	LM Language Service	No	MWBE	Transcription	English	9/1/22 – 8/31/23	\$ 274,645.00	\$ 115,291.50
OATH	Simulinqa Inc	No	Small Purchase	Backup telephonic interpretation	Spanish, Mandarin, Arabic, Portuguese, Hindi, Wolof, French, Punjabi, Bengali, Cantonese, Haitian Creole	6/3/22 - 6/2/25	\$ 6,160.00	\$ 3,348.61
OATH	Voiance Language Services, LLC	No	Small Purchase	Backup telephonic interpretation	Spanish, Shanghainese, Mandarin, Bengali, Bambara, Russian, Arabic, Korean, Cantonese, Sinhala, Haitian Creole, French	7/1/22 - 6/30/23	\$ 186.00	\$ 186.00
SBS	Accurate Communications	No	DCAS Task Order	In-person interpretation	100+ languages	7/1/18 - 6/30/25	\$ 237,150.00	\$ 6,354.00

SBS	Asian American Federation, APNA Brooklyn Community Center, African Communities Together, Chhaya Community Development Corporation, Life of Hope Center, Women's Empowerment Coalition of NYC	Yes	Council Discretionary	Translation	Korean, Chinese, Urdu, French, Bengali, Haitian Creole, Arabic	7/1/22-6/30/23	\$ 100,000.00	\$ 67,910.00
SBS	Geneva Worldwide	No	DCAS Task Order	Translation	200+ languages	7/1/18 - 6/30/25	\$ 365,250.00	\$ 56,572.00
SBS	Voiance Language Services, LLC	No	DCAS Task Order	Telephonic Interpretation	200+ languages	7/1/18 - 6/30/25	\$ 13,575.00	\$ 4,840.00
TLC	International Language Services	No	MWBE Small purchase	Translation, in-person interpretation	100+ languages	7/1/22 - 6/30/25	\$ 450,000.00	\$ 115,364.00
TLC	Language Line Solution	No	DCAS Task Order	Interpretation	200+ languages		\$ 52,164.00	\$ 66,445.12
TLC	Voiance Language Services, LLC	No	DCAS Task Order	Telephonic interpretation	200+ languages		\$ 6,887.00	\$ 3,104.45
OCME	Language Line Solution	No	DCAS Task Order	Telephonic Interpretation	Spanish, Chinese, Russian, Bengali, Haitian, Korean, Arabic, Urdu, French, Polish	6/3/21 - 6/2/24	\$ 90,000.00	\$ 23,933.51
OCME	Geneva Worldwide	No	DCAS Task Order	Translation	Spanish, Chinese, Russian, Bengali, Haitian, Korean, Arabic, Urdu, French, Polish	6/3/21 - 6/2/24	\$ 10,000.00	\$ 346.95



Mayor's Office of  
Immigrant Affairs

Nisha Agarwal  
Commissioner

## Memorandum

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**To:** Mayor Bill de Blasio and Speaker Melissa Mark-Viverito  
**From:** Nisha Agarwal, Commissioner, Mayor's Office of Immigrant Affairs  
Mindy Tarlow, Director, Mayor's Office of Operations

**Date:** May 15, 2017

**Subject:** Preliminary Assessment of Designated Citywide Languages for Local Law 30 of 2017

Submitted by the Mayor's Office of Immigrant Affairs and the Mayor's Office of Operations in compliance with Local Law 30

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### Summary:

Local Law 30 requires MOIA to produce a preliminary report on the ten citywide languages. This memo outlines the basis for selecting the top ten languages, and presents the data. It also raises some considerations going forward.

### 1. Requirements

Section 6 of Local Law 30 requires the Office of the Language Services Coordinator (OLSC) [in effect, the Mayor's Office of Immigrant Affairs, in collaboration with the Mayor's Office of Operations] to "make a preliminary assessment, based on the best available data, of the ten limited English proficiency languages likely to be the designated citywide languages when section 2 of this local law takes effect, and report the results of that preliminary assessment to the speaker and the mayor."<sup>1</sup>

LL30 further designates how the "Designated citywide languages" are to be determined:

- The top six limited English proficiency languages spoken by the population of New York city as determined by the department of city planning and the office of the language services coordinator, based on United States census data; and
- The top four limited English proficiency languages spoken by the population served or likely to be served by the agencies of the city of New York as determined by the office of the language services coordinator, based on language access data collected by the department of education, excluding the languages designated based on United States census data.

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<sup>1</sup> NYC City Council, Local Law 30, available at:

<http://legistar.council.nyc.gov/LegislationDetail.aspx?ID=2735477&GUID=D0A0ECA1-4D71-47EB-B44D-5919777ED818>



Mayor's Office of  
Immigrant Affairs

## 2. Top six languages

As noted by City Council, Local Law 30 represents a codification and expansion of Executive Order 120 (2008).<sup>2</sup> LL30 effectively applies the standard established under EO120 for determining the top six LEP languages.

Based on its analysis of 2011-15 American Community Survey data from the Census Bureau, the Department of City Planning released the table, "Top Languages Spoken at Home by Limited English Proficiency (LEP)," in February 2017.<sup>3</sup> The top six LEP languages are:

1. Spanish
2. Chinese\*<sup>4</sup>
3. Russian
4. Bengali
5. Haitian Creole<sup>5</sup>
6. Korean

According to the Census numbers, there is a significant gap between the numbers of LEP speakers for the sixth and seventh LEP languages.

## 3. Additional four languages

The four languages added by LL30 are determined by the Office of the Language Services Coordinator, based on Department of Education (DOE) data, specifically the Parent's Preferred Language report.

As part of its annual registration process, DOE collects data from parents about language spoken at home and preferred language for written and spoken communications. The result is a dataset of over a million records, capturing language communities in which children attend the City's public school system across the five boroughs.

Based on an average of DOE's data from school years 2011-2012 through 2015-2016 for preference for written communications from the Parent's Preferred Language Report, the top four languages that are not included in the top six languages are:

7. Arabic
8. Urdu
9. French
10. Polish

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<sup>2</sup> NYC City Council, Summary of Int. No. 1181, available at:

<http://legistar.council.nyc.gov/LegislationDetail.aspx?ID=2735477&GUID=D0A0ECA1-4D71-47EB-B44D-5919777ED818>

<sup>3</sup> NYC Department of City Planning, "Top Languages Spoken at Home by Limited English Proficiency (LEP)" (February 2017), available at: [http://www1.nyc.gov/assets/planning/download/office/data-maps/nyc-population/acs/top\\_lang\\_2015pums5yr\\_nyc.xlsx](http://www1.nyc.gov/assets/planning/download/office/data-maps/nyc-population/acs/top_lang_2015pums5yr_nyc.xlsx)

<sup>4</sup> Census Bureau specifies that this language category includes Chinese, Mandarin, Cantonese, Taiwanese. See note about spoken language.

<sup>5</sup> The Census data specified French Creole, which is a Census language category. In the NYC context, this effectively means Haitian Creole.

#### 4. List of 10 languages

Therefore, based on averages of five-year data from the Census Bureau's American Community Survey and the DOE, the 10 covered languages under Local Law 30 are:

1. Spanish
2. Chinese
3. Russian
4. Bengali
5. Haitian Creole
6. Korean
7. Arabic
8. Urdu
9. French
10. Polish

#### 5. Discussion

- The two datasets on which the language determination is based are relatively robust, collected on a regular basis across all communities of the City. Guidance from the Federal Department of Justice notes school records as a potential source of language data.<sup>6</sup>
- The data from DOE captures a younger demographic of New Yorkers with school-aged children. This dataset may therefore identify more recent or emerging LEP communities.
- We apply the five-year average for both Census and DOE data to ensure comparability as well as stability of language data. In this way, the data represent language trends, but do not overweight data from an individual year.
- DOE provided annual data from the Parent's Preferred Language report over the school years 2011-12 through 2016-17. MOIA produced a five-year average of the school years 2011-12 through 2015-16, in order to base the four additional languages on the same period as the City Planning data.
- Over the period 2011-15, DOE data indicates that approximately 33% of the parents preferred written communication in a language other than English. Note that DOE data do not technically identify limited English proficiency, unlike the Census.
- Given the City's communication needs for service provision, the designated citywide languages largely apply to the translation of written communications. The Census language data, however, are technically based on three questions on the Census form that address spoken language.<sup>7</sup> The selection

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<sup>6</sup> U.S. Department of Justice, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 Fed. Reg. 117 (June 18, 2002). *Federal Register: The Daily Journal of the United States*. Available at: <https://www.gpo.gov/fdsys/pkg/FR-2002-06-18/pdf/02-15207.pdf>

<sup>7</sup> Questions from Census form [<https://www.census.gov/topics/population/language-use/about/faqs.html>]

- a. Does this person speak a language other than English at home?
  - Yes
  - No
- b. What is this language? (For example: Korean, Italian, Spanish, Vietnamese)
- c. How well does this person speak English?
  - Very well
  - Well
  - Not well
  - Not at all

of languages is based on the assumption that one's written language needs generally mirrors one's spoken language. Through both internal and contracted language services – telephonic interpretation, in particular – City agencies have more capacity to support language access for oral communications.

- Note that there are two forms of written Chinese: traditional characters and simplified characters. Given the lack of data on whether readers of Chinese prefer traditional or simplified characters, MOIA/OLSC does not currently have the basis to require a specific written form or both forms of Chinese through Local Law 30.
- While this memo addresses the determination of the designated Citywide languages, we also highlight that Local Law 30 requires that agencies consider other data sources, including internal records, during the process of developing their respective language access implementation plans and when providing services.

**Resources**

U.S. Census Bureau

<https://www.census.gov/topics/population/language-use.html>

<https://www2.census.gov/programs-surveys/acs/about/qbyqfact/2016/Language.pdf>

<https://www.census.gov/library/working-papers/2015/demo/SEHSD-WP2015-18.html>

**Tables**

NYC Department of City Planning, Top Languages Spoken at Home by Limited English Proficiency (LEP)

[http://www1.nyc.gov/assets/planning/download/office/data-maps/nyc-population/acs/top\\_lang\\_2015pums5yr\\_nyc.xlsx](http://www1.nyc.gov/assets/planning/download/office/data-maps/nyc-population/acs/top_lang_2015pums5yr_nyc.xlsx)

<b>New York City, 2011-15</b>			
		<b>Total</b>	<b>Percent</b>
	<b>Total LEP</b>	<b>1,817,339</b>	<b>100.0</b>
1	Spanish	888,936	48.9
2	Chinese*	317,693	17.5
3	Russian	116,172	6.4
4	Bengali	51,276	2.8
5	French Creole	50,231	2.8
6	Korean	43,796	2.4
7	Italian	27,565	1.5
8	Yiddish	27,445	1.5
9	Arabic	26,635	1.5
10	Polish	25,169	1.4
11	Urdu	21,072	1.2
12	French	20,885	1.1



NYC Department of Education, Data from the Citywide Parent's Preferred Language Report, based on data tables provided to MOIA by DOE

New York City, 2011-15			
		Avg. Total	Percent
1	Spanish	341524	62.8%
2	Chinese, Any	92356	17.0%
3	Bengali	24566	4.5%
4	Arabic	14146	2.6%
5	Russian	13518	2.5%
6	Urdu	9481	1.7%
7	Haitian Creole	6641	1.2%
8	Korean	6406	1.2%
9	French	4319	0.8%
10	Polish	3783	0.7%
11	Punjabi	3401	0.6%
12	Albanian	3185	0.6%

Top languages combining City Planning/Census and DOE data

		City Planning/Census data		DOE data
		Total	Percent of LEP	% of non-English
		<b>1,817,339</b>	<b>100.0</b>	
1	Spanish	888,936	48.9	62.8
2	Chinese*	317,693	17.5	17
3	Russian	116,172	6.4	2.5
4	Bengali	51,276	2.8	4.5
5	Haitian Creole	50,231	2.8	1.2
6	Korean	43,796	2.4	1.2
7	Arabic	26,635	1.5	2.6
8	Urdu	21,072	1.2	1.7
9	French	20,885	1.1	0.8
10	Polish	25,169	1.4	0.7
Other languages for comparison				
	Punjabi			0.6
	Albanian			0.6
	Italian	27,565	1.5	0.1
	Yiddish	27,445	1.5	~0



The New York City Administration for  
Children's Services

## 2021 Language Access Implementation Plan



Language Access Coordinator: Elian Maritz, Esq.

## **MESSAGE FROM COMMISSIONER DAVID HANSELL**

The NYC Administration for Children's Services (ACS) is committed to protecting all New York City children and supporting their families no matter their national origin, legal status or English language proficiency. We know that 23% of NYC families are limited-English proficient, and ensuring these families have meaningful language access support is critical to our work.

We are proud of the extensive language access services currently offered to the families we work with, including interpretation services which include in-person, telephonic and video-remote platforms and written translation. However, in the years ahead, we plan to build upon and improve this work further. The 2021 Language Access Implementation Plan outlines the work we are doing to expand internal communication on and awareness of ACS's language access services and policy, enhance the quality and consistency of language access services and continue engaging with families and advocating on language access issues. We are committed to making sure all New York City children and families with limited English proficiency have equal access to the programs and services provided by ACS and our contracted providers.

Thank you for your support of this vital and challenging work.

David Hansell

Commissioner, NYC Administration for Children's Services

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## **I. Agency Mission and Background**

The Administration for Children’s Services (ACS) is responsible for protecting the safety and promoting the well-being of New York City’s children and strengthening their families by providing child welfare, juvenile justice, child care and early education services. In child welfare, ACS contracts with nonprofit organizations to support and stabilize families at risk of a crisis through prevention services and with foster care agencies for children not able to remain safely at home. Each year, the agency’s Division of Child Protection conducts over 45,000 investigations of suspected child abuse or neglect. In youth and family justice, ACS manages and funds services including detention and Close to Home placement, intensive community-based alternatives for youth, and support services for families. In the Division of Child and Family Well-Being, created in September 2017, ACS issues child care vouchers for more than 64,000 children eligible for subsidized child care, and promotes a two-generation approach to child and family well-being, family stability, and equity through public education campaigns and a place-based approach including Family Enrichment Centers and the Community Partnership Program.

## **II. Agency Language Access Policy and Goals**

The Administration for Children’s Services (ACS) seeks to administer equitable child welfare and juvenile justice systems in which a child or family’s race, ethnicity, national origin, immigration status, language, gender, gender identity/gender expression and sexual orientation do not predict how they fare. As part of these equity goals, ACS is committed to ensure that New York City’s children and families with limited English proficiency have equal access to all programs and services provided by ACS and our contracted providers. In order to achieve this, ACS provides interpretation in over 240 languages, translates commonly distributed public facing documents into the 10 priority Citywide languages required by Local Law 30 (Spanish, Chinese, Bengali, Russian, Arabic, Urdu, Haitian Creole, Korean, Polish and French) and translates other important agency documents on demand. All language access services are free to NYC families.

ACS’s Language Access Policy is integral to the Agency’s mission to promote the safety and well-being of all NYC children and ensuring NYC families have access to our programs and services. Quality and timely language access services enable the effective and constructive interactions between staff and families that are needed for improving outcomes for children and families. Individuals should not face obstacles to receiving any ACS services for which they may be eligible because they do not speak, understand, or read and/or write English. Similarly, the outcome of an ACS child protective investigation must not be impacted by the language a family speaks. ACS requires implicit bias training for all staff and provides continual discussion and learning opportunities about race, diversity, intersectionality, oppression and systemic racism.

ACS is proud of the extensive language access services we currently offer and will use the next three years to build on and improve those existing services. ACS’s overarching goals for the 2021 Language Access Implementation Plan (LAIP) are:

1. Expand internal communication on and awareness of ACS’s language access services and policy;
2. Enhance quality and consistency of language access services;

3. Continue to engage with ACS families and advocates on language access issues.

**Goal 1: Expand internal communication on and awareness of ACS's language access services and policy**

As ACS prioritized in the last LAIP, the Agency is in the process of finalizing ACS's new Language Access Policy, which will replace previous versions of the policy to ensure compliance with the latest local law. The Policy was sent for public comment, suggestions are being incorporated where appropriate and the Policy will soon be sent to our state oversight agency for final approval.

The Policy applies to all ACS and provider agencies, including Prevention and Foster Care services. One of the most important goals of the next three years will be to ensure that knowledge and awareness of the new Language Access Policy and its requirements reach all ACS and provider agency staff. To do so, the ACS Office of Immigrant Services and Language Affairs (ISLA) will be coordinating an Agency-wide initiative to train all staff on the new Policy. This will include working with the James Satterwhite Academy, which trains all new Child Protection Specialists (CPS) and the ACS Workforce Institute, which provides continuing education and training to ACS and provider agency staff, to ensure they are incorporating the new Language Access Policy in their language access guidance.

In addition, ISLA will be providing language access trainings directly to ACS divisions and provider agencies. Furthermore, ISLA will be responsible for creating and regularly updating ACS division/agency specific language access desk aids, which summarize clients' language access rights, language access best practices and how to access language access services.

**Goal 2: Enhance quality and consistency of language access services**

To help better coordinate language access services at ACS, a major development since our 2018 plan is that ACS consolidated all language access contract management and policy guidance into our ACS Office of Immigrant Services and Language Affairs (ISLA). To support this new organizational structure, ACS created and hired for a new position, Language Access Contract Manager, whose exclusive focus is overseeing the Agency's five language access contracts. This restructuring and staffing have allowed us to approach contract management through a language access lens, ensuring that our interpretation and translation vendors are not only providing their contracted services, but doing so in the best way possible to meet the needs of our LEP client population.

Over the next three-year period, we aim to create clear feedback loops, using information from LEP families, frontline staff, interpreters and advocates to inform future service provision. To that end, we will work closely with our vendors, the NYC Department of Citywide Administrative Services (DCAS), who manages the master contracts, and our staff to create systems that provide ACS Language Access Contract Management with consistent and comprehensive feedback.

In addition, we hope to expand ACS's internal capacity to provide services directly in other languages, rather than only through third party interpreters. Currently, ACS staff generally do not provide services in languages other than English. Our goal is to work toward a system by which ACS staff can be certified for fluency in languages other than English and voluntarily provide services directly in those languages, rather than needing to use a third-party interpreter. In addition, we would like to increase the number of bilingual staff at the Agency, through recruitment and use of the selective certification hiring process.

Finally, we will work closely with the vendors who provide interpretation and translation services, to strengthen their capacity to support language access in the child welfare context. Child welfare terminology is unique and contains many terms of art. Precision and consistency is extremely important in interpretation and translation, as the vocabulary used can impact the trajectory of an investigation. For that reason, since the previous LAIP, ACS has developed a child welfare-specific style guide and glossary, which has been distributed to our vendors. We hope to build on this foundation and provide further training and guidance to interpreters and translators on trauma-informed interpretation practices.

**Goal 3: Continue to Engage with families and advocates on language access issues.**

ACS recognizes the importance of family voice in the child welfare system. In our previous LAIP, we stated a goal of ensuring that the youth, families, and communities ACS serves are aware of their right to free language services. While we have made progress on this goal, there is still work to be done, and for that reason are including it again in our new LAIP.

Since the last LAIP, ACS has prioritized creating mechanisms to involve parents and youth voice in policy and practice. ACS established a Parent Advisory Council with 21 members. It includes individuals who work with organizations that formed the original Steering Committee and that represent voices from across the spectrum of ACS programs. ACS also established a Youth Leadership Council to bring together the voices (experiences, complications, triumphs, challenges, needs) of youth that are system-involved into the development and implementation of policies, programs and services that positively impact young people in and who have exited out of the foster care and juvenile justice systems. Our goal for the next LAIP period is to engage the Parent Advisory Council and Youth Leadership Council on ACS's language access programming. We will use their feedback to help ACS strengthen our language access work and make it more responsive to the needs of parents and youths.

Over the next few years, we will continue outreach to community members to raise awareness about ACS's language access program, specifically on families' rights to free interpretation services, that requesting services will not prejudice their cases and how and where to provide feedback on their language access experience. ACS will continue our work with the Supporting Immigrant Children and Families Working Group, made up of ACS staff and advocates, to receive consistent and current feedback on ACS's language access services and build a collaborative relationship with advocates and the families we serve.

In addition, we plan to review all ACS public access offices to ensure free interpretation signage is up-to-date and easily visible for LEP families upon entering the space. We will do a full review with all public facing divisions to ensure free interpretation signs are placed in all entrances and in conference rooms used by families and provide continuing technical support to ensure they are kept current in the future.

**III. Agency Language Access Accomplishments and Progress on Goals from Previous LAIP**

ACS's laid out three overarching goals in our last LAIP:

1. Support public-facing staff who work with LEP clients;
2. Collect, measure and evaluate key data; and
3. Enhance community awareness and engagement.

Over the past three years, ACS has made significant progress on all three fronts. We will discuss each in turn.

## **Goal One: Support Public-Facing Staff Who Work With LEP Clients**

### ***Language Access Policy and Training***

As prioritized in our first Language Access Implementation Plan, ACS developed a new ACS Language Access Policy, which reflects the language access obligations of all divisions and contracted providers. Development of the new Language Access Policy required extensive cross-divisional support and coordination, and ISLA worked closely with the ACS Division of Policy, Planning and Measurement to ensure feedback was incorporated from every ACS division. As is the protocol for all ACS policies, the Policy was sent for public comment, and comments are being incorporated as appropriate. ACS will soon seek interim approval, while the Policy awaits final approval from ACS's oversight agency, the NY State Office of Children and Family Services (OCFS).

The ACS Office of Immigrant Services and Language Affairs (ISLA) will be collaborating with ACS's training institutes, the James Satterwhite Academy, which trains all new Child Protection Specialists (CPS) and the ACS Workforce Institute, which provides continuing education and training to ACS and provider agency staff, to ensure they are incorporating the new Language Access Policy in their language access guidance. In addition, ISLA will provide trainings directly to ACS and provider agency staff on the new Language Access Policy, once it has received interim approval status.

### ***Upgrading Technology***

ACS completed the goal of providing frontline CPS with tablets to support prompt delivery of services, including language access services, in the field. In addition, ACS rolled out the Language Line Solutions application, which staff can download to their tablet or ACS-issued smartphone. The application helps connect ACS and provider agency staff to a telephonic interpreter at the touch of a button, rather than necessitating that they remember the Language Line hotline number and their agency code, ACS has also upgraded key forms to make them electronically fillable and has integrated language accessibility in this project by ensuring the fillable forms are available in the 10 Citywide languages.

As planned in the previous LAIP, ACS developed a new electronic system for requesting in-person or video-remote interpretation sessions, replacing the paper voucher system. This new process removes additional barriers to requesting an interpreter for ACS staff, thereby ensuring that language access services are requested and offered as quickly as possible for LEP families. In addition, the new electronic system allows for ACS contract management to receive faster and more specific feedback about quality of interpretation services.

### ***Plain Language***

ACS created a cross-divisional team of key staff that met regularly to review the Agency's existing forms for plain language. In 2018, that team conducted an intensive review of ACS's existing public-facing documents (forms and brochures). The group reviewed 500 forms and brochures and determined that there are approximately 60 public-facing forms and approximately 20 brochures that are in active use and are commonly distributed. The remaining forms were used by staffers for internal use within ACS. ACS hired a consultant to review these key public facing forms and re-write them in plain language. The commonly distributed public facing plain language forms were then translated into the ten Citywide

languages. The forms and their translations are posted on ACS's internal internet page, to be made easily available for all staff.

In addition, ACS hired a consultant to provide plain language trainings to public-facing ACS divisions, thereby building internal capacity to write public-facing documents in plain language going forward. The consultant conducted six plain language trainings across ACS's public facing divisions, including the ACS External Affairs division, which is has primary responsibility for public-facing communications.

### ***Translations***

The ACS Office of Immigrant Services and Language Affairs (ISLA) provides trainings to all public-facing ACS divisions on Local Law 30's translation requirements. In addition, ISLA sends an annual reminder to agency leadership on the requirement to translate all commonly distributed public facing documents into the 10 Citywide languages. ACS has also developed a Style Guide and Glossary of key terms (translated into the 10 Citywide languages) to improve the quality and consistency of agency translations.

## **Goal Two: Collect, Measure and Evaluate Key Data**

### ***Building Internal Capacity***

Since the last Language Access Implementation plan, ACS has consolidated its language access policy and language access contract management work into one office: the ACS Office of Immigrant Services and Language Affairs (ISLA). In addition, this office was elevated to a standalone office within the Division of External Affairs, reporting directly to the Deputy Commissioner, and was given greater resources and staff, to ensure that language access contract management was conducted through a language access lens.

ISLA engages in regular outreach to community groups and advocates to ensure that feedback on language access is received and incorporated into agency practice and quality assurance. ISLA conducts regular meetings and listening sessions with ACS and provider agency staff, in addition to sending out surveys to staff who request language access services, to receive feedback on the quality of interpretation services.

### ***Updating Data Fields***

In addition, in our 2018 LAIP, we discussed that we would be working with the NY State Office of Children and Family Services (OCFS) to propose changes to the way we are required to collect data on families' language needs. All child welfare agencies in NY State must use the child welfare database CONNECTIONS (CNNX) to document information about clients and families. We worked closely with the State team who manages the database to propose changes to the way language data is collected in this database. The State team agreed to clarify in the database that the "Language" field is asking for the clients "Preferred Language" and to include a new data field in the database, which will specifically track if the individual is limited-English proficient (LEP). This change was rolled out in 2020 and will provide more precise data on ACS's LEP client population in the future.

## **Goal Three: Enhance Community Awareness and Engagement**

ACS's Communications team has made strides in reaching immigrant and LEP New Yorkers. Since the 2018 LAIP, ACS added a bilingual press secretary, who focuses on increasing outreach to ethnic and non-English



media. With his support, we actively pitch ethnic media outlets, including Spanish language media outlets. We secured approximately 20 such stories in 2020. As a result of our efforts, we have built close relationships with assignment desk managers, reporters and anchors in Spanish language media outlets including: El Diario, Univision, Telemundo, and NY1 Noticias. Any and all media inquiries we receive from Spanish language media are provided with statements or background information in Spanish and English. We also make available Spanish-speaking ACS representatives for interviews in Spanish. When our ACS representatives are doing media interviews in Spanish, we conduct media training and provide talking points in Spanish for support. ACS translates key press releases into Spanish, which are posted to our public website (<https://www1.nyc.gov/site/acs/about/pressReleasesEsp.page>). In addition, the ACS website is available in translation through google translate, and key documents posted to the public facing website are translated into the 10 Citywide languages.

The ACS Communications Team works closely with City agencies and the City Hall Creative Communications Team to share vital information about citywide resources via social media. As part of that work, each month, we make sure there are social media posts in Spanish. Below are a just few examples of Spanish language social media posts in 2020:

- NYC ACS on Twitter: "Social distancing shouldn't mean social isolation. If you or someone you know is struggling, call for help. El distanciamiento social no significa aislamiento social. Si tu, o alguien que tu conoces tiene dificultades, solicita ayuda. <https://t.co/bZIP7I2CL9>" / Twitter
- NYC Immigrant Affairs on Twitter: "Get tested for #COVID19 at any of NYC's testing sites today! Safe. Simple. Easy. ¡En NYC hay nuevos centros para realizar pruebas de detección de COVID-19! Seguro, sencillo y fácil. 纽约市开放了新的COVID-19检测站点！安全，简单，便利。 <https://t.co/uwynPQgs9A> #FightCovidNYC <https://t.co/3cTbzurSGZ>" / Twitter
- NYC Immigrant Affairs on Twitter: "New York City Begins Phase Two of Reopening This announcement is available in additional languages in this thread. <https://t.co/nB57aSi51h>" / Twitter
- NYC ACS on Twitter: "¿Se siente abrumado? ¡Usted no está solo! Visite la nueva página web de @ACSNYC para encontrar recursos que lo ayudarán a sobrellevar el #COVID19, incluyendo despensas de comida, actividades para niños y más. #COVID19 <https://t.co/cli0yYI5yr> <https://t.co/AWTCTGeQ1U>" / Twitter
- NYC ACS on Twitter: "Padres y cuidadores: Si se sienten abrumados durante este momento complicado, ¡recuerden que no están solos! Visiten el nuevo sitio web de @ACSNYC para obtener información sobre los diversos recursos gratis para ustedes y su familia. <https://t.co/POQIU5i63R> <https://t.co/uMq1qBR4q2>" / Twitter

In regards to direct community outreach, ACS's language access services are discussed in ACS's "Getting to Know ACS" presentations, which are given to community groups and public sector partners across the city to help explain the child welfare, juvenile justice and early child care and education programs and policies. Interpretation for "Getting to Know ACS" presentations is available, depending on the audience language needs.

In addition, ACS has developed flyers for our Prevention Services provider agencies, explaining clients' language access rights and the agencies' obligations. The flyers also outline agency-specific instructions on how to request interpretation services and make any language access complaints. This information is also included in ISLA's trainings for provider agencies.

#### IV. LEP Population Assessment

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

According to the Mayor's Office of Immigrant Affairs (MOIA) 2019 Annual Report, 23% of New Yorkers are limited-English proficient (LEP).<sup>1</sup> Of that population, MOIA provides information on the percentage of LEP foreign-born New Yorkers who speak different languages, which is included below:

	<b>Language Spoken by the foreign-born with LEP</b>	<b>% of all foreign-born LEP in NYC (2019)</b>
1	Spanish	45.00%
2	Chinese*	20.00%
3	Russian	7.00%
4	Bengali	4.00%
5	Haitian Creole	2.30%
6	Korean	2.20%
7	Arabic	1.70%
8	French	1.60%
9	Polish	1.50%
10	Urdu	1.40%

*Source: Mayor's Office of Immigrant Affairs (MOIA) Annual Report for Calendar Year 2019, "State of Our Immigrant City."*

Another helpful dataset for NYC's population is from the American Community Survey, the last 5-year survey available is from 2017, and is pasted below:

##### **Top Languages Spoken at Home by Limited English Proficiency (LEP) 2013-2017 American Community Survey Summary File**

	<b>Total</b>	<b>Percent</b>
<b>Total LEP</b>	<b>1,844,527</b>	<b>100</b>
Spanish	887,413	48.1
Chinese (incl. Mandarin, Cantonese)	341,489	18.5
Russian	111,237	6

<sup>1</sup> Mayor's Office of Immigrant Affairs (MOIA) Annual Report for Calendar Year 2019, "State of Our Immigrant City," <https://www1.nyc.gov/assets/immigrants/downloads/pdf/MOIA-Annual-Report-for-2019.pdf> at p19.

Bengali	57,364	3.1
Korean	45,732	2.5
Haitian	44,841	2.4
Yiddish, Pennsylvania Dutch or other West Germanic language)	31,374	1.7
Arabic	28,147	1.5
Italian	26,731	1.4
Polish	25,443	1.4
French (incl. Cajun)	22,207	1.2
Yoruba, Twi, Igbo or other languages of Western Africa	21,327	1.2

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

At ACS, we have several different ways of measuring out LEP client population and their language needs. As noted above, ACS, like other child welfare agencies in New York State, is legally mandated use the statewide database CONNECTIONS (CNNX). ACS and provider agency staff who use CNNX as their record keeping system enter all relevant information, including the client’s preferred language for communication, into the database. If the client speaks one language, but reads and/or writes in another, staff indicate the latter language within the progress notes in the database. See below for the reports for the primary language of individuals with ACS cases (which were referred to ACS through the State Central Registry) in 2020 and 2019:

**Primary Language of Individuals Involved in SCR Reports, CY20 and CY19**

Includes children, subjects, and other family members who had no role in the SCR report.

A persons may be counted more than once with were involved in more than one SCR intake during the year

Language	Persons in SCR Intakes CY20		Persons in SCR Intakes CY19	
	#	%	#	%
English	163,622	86.95%	213,245	86.07%
Spanish	15,760	8.37%	22,016	8.89%
Unknown	3,451	1.83%	5,095	2.06%
Mandarin	1,011	0.54%	1,378	0.56%
Multiple Languages	981	0.52%	1,487	0.60%
Bengali	748	0.40%	964	0.39%
Arabic	528	0.28%	627	0.25%
Russian	420	0.22%	501	0.20%
Creole	330	0.18%	427	0.17%
Cantonese	221	0.12%	304	0.12%
French	173	0.09%	260	0.10%
Chinese	153	0.08%	296	0.12%
Urdu	142	0.08%	231	0.09%
Amer Sign	93	0.05%	103	0.04%
Punjabi	79	0.04%	93	0.04%
Korean	77	0.04%	108	0.04%
Polish	55	0.03%	47	0.02%

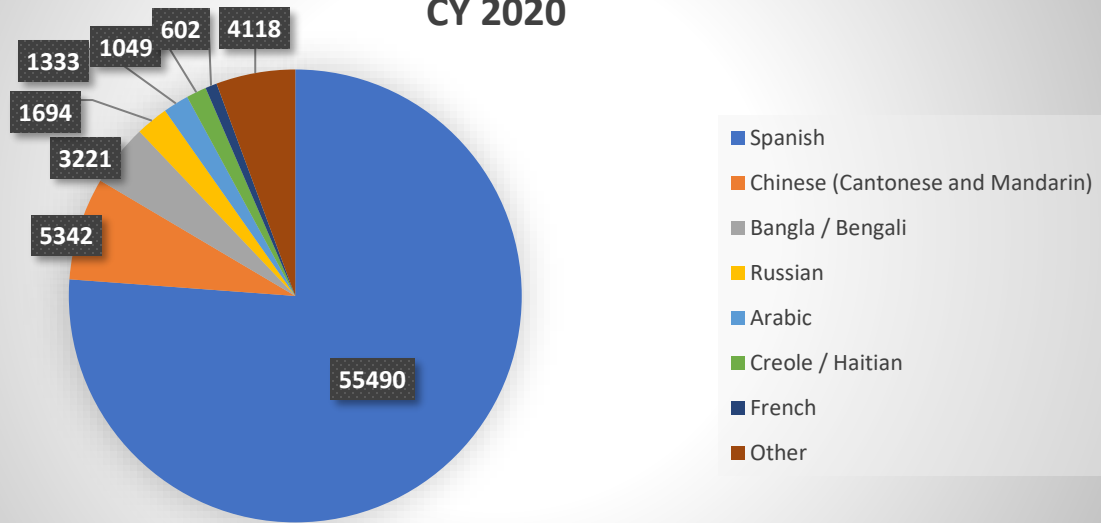
Hindu	36	0.02%	40	0.02%
Yiddish	36	0.02%	22	0.01%
Fujianese	35	0.02%	35	0.01%
Vietnamese	30	0.02%	37	0.01%
Albanian	24	0.01%	71	0.03%
Hebrew	23	0.01%	42	0.02%
Fulani	22	0.01%	64	0.03%
Portuguese	17	0.01%	50	0.02%
Romanian	17	0.01%	29	0.01%
Japanese	13	0.01%	14	0.01%
Ethiopian	12	0.01%	20	0.01%
Czech	10	0.01%	19	0.01%
Italian	10	0.01%	16	0.01%
Nigerian Ibo	9	0.00%	10	0.00%
Nat Am Lan	7	0.00%	9	0.00%
SerboCroatian	7	0.00%	14	0.01%
Tagalog	6	0.00%	17	0.01%
German	5	0.00%	4	0.00%
Greek	5	0.00%	8	0.00%
Farsi	4	0.00%	10	0.00%
Filipino	4	0.00%	4	0.00%
Cambodian	3	0.00%	3	0.00%
Braille	2	0.00%	3	0.00%
Gukarati	2	0.00%	12	0.00%
Bosnian	1	0.00%	4	0.00%
Khmer	0	0.00%	5	0.00%
<b>TOTAL</b>	<b>188,184</b>	<b>100%</b>	<b>247,744</b>	<b>100%</b>

Data Source: Connections as of 2/20/2002 for CY19 and 2/08/2021 for CY20,  
Prepared by Report Development and Analysis Unit/ORR/DPPM

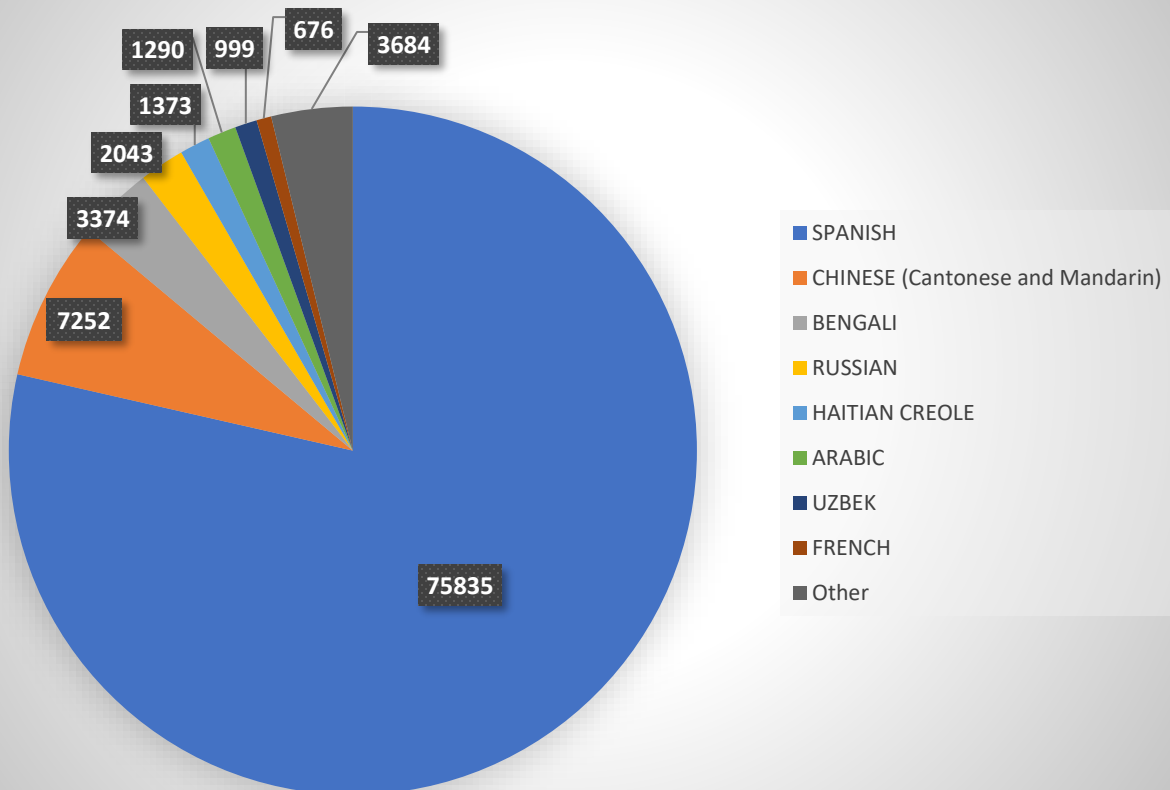
ACS considers all interactions with children and families as part of the agency's services and engagements. As such, ACS also uses vendor data from instances when interpretation services were provided in-person and telephonic.

Below is the data from our in-person and video-remote and our telephonic interpretation requests for CY2020.

### In-Person and Video-Remote Interpretation Requests in CY 2020



### Telephonic Interpretation Requests in CY2020



We can use the data from CNNX and our vendors, to draw a comparison with the LEP percentage data from MOIA. Please see below:

	Language Spoken by the foreign-born with LEP	% of all foreign-born LEP in NYC (2019)	% of all LEP in CNNX (2020)	% of all Accurate Requests	% of all LLS Telephonic Requests
1	Spanish	45.00%	78%	76%	79%
2	Chinese*	20.00%	7%	7%	8%
3	Russian	7.00%	2%	2%	2%
4	Bengali	4.00%	4%	4%	3%
5	Haitian Creole	2.30%	2%	1%	1%
6	Korean	2.20%	0%	0%	0%
7	Arabic	1.70%	3%	2%	1%
8	French	1.60%	1%	1%	1%
9	Polish	1.50%	0%	0%	0%
10	Urdu	1.40%	1%	1%	1%

A clear takeaway from ACS’s data compared against the citywide LEP data is the percentage of ACS-involved LEP individuals who are Spanish-speaking is much higher than the citywide numbers. For this reason, ACS has developed a dedicated On-Site Spanish interpretation program, which provides onsite interpreters at ACS field offices. This data will also inform our goal of increasing bilingual capacity of ACS staff, so as to reflect our LEP client needs.

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

Providing meaningful and accessible language services is vital to ACS’s mission of promoting the safety and wellbeing of all NYC children. Much of ACS’s work with families is rooted in a family engagement model, which requires collaboration between the child welfare professional and the families we serve. In order to be successful, families must have the ability to fully participate in the process and there must be trust between the parties. As such, meaningful communication, through quality and easily accessible interpretation and translation, is a necessary prerequisite for ACS’s model of work. The Agency is constantly striving to improve the quality of our language services and minimize barriers to receiving those services.

Specifically, this Plan reflects ACS’s commitment to providing language access services and meeting the following over-arching goals:

1. Expand internal communication on and awareness of ACS’s language access services and policy;
2. Enhance quality and consistency of language access services;
3. Engage with ACS families and advocates on language access issues.

**V. Provision of Language Access Services**

ACS has one of the largest investments in language access vendor services of any City agency. We provide in-person, video-remote, on-site Spanish and telephonic interpretation and written translation,

through two different vendors: Accurate Communication and Language Line. Frontline staff receive training on how to access language services during onboarding and receive additional refresher training after that. ACS Immigrant Services and Language Affairs prepares and regularly updates division-specific Desk Aids with clear instructions on how to request interpretation and translation services, an explanation of LEP clients' right to interpretation and translation services and guidance on where/how to make complaints.

### ***Translation Services***

ACS contracts with Language Line Solutions (Language Line or LLS) to provide translation services for the agency. ACS has a dedicated Language Access Contract Manager, who is part of the ACS Office of Immigrant Services and Language Affairs. The Contract Manager liaises with LLS to request that documents are translated. ACS ISLA provides trainings to leadership in different public-facing divisions on the LL30 requirements to translate commonly distributed public-facing documents into the 10 Citywide languages.

The new ACS Language Access Policy defines "commonly distributed documents" as those ACS documents most often provided to families that contain or elicit important and necessary information regarding the provision of services, i.e., those relating to:

- Program participation (e.g., intake and consent forms);
- Reduction, denial, or termination of services or benefits and the right to appeal such actions;
- Actions and proceedings affecting parental custody (excluding court filings);
- Administrative hearings and/or other investigations;
- The recipient's awareness of rights, requirements, or responsibilities; and
- Time-sensitive or required responses from an LEP individual.

ISLA sends an annual reminder to leadership in all public-facing divisions to conduct an internal review to see if there are any new commonly distributed public facing documents that have not yet been translated. In addition to commonly distributed documents, a large number of ACS's translations are case-specific documents for individual clients, such as conference notes and/or other client documents.

ACS has developed a translation style guide and glossary (translated into the 10 Citywide languages), to ensure that translations are consistent and accurate. All translations of public documents are sent to the divisions for distribution to clients and are posted on the ACS ISLA internal internet page, to be easily available to staff. Translation requests, like any other language access request or inquiry, can be sent directly to our language access mailbox: [language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov).

### ***Interpretation Services***

ACS provides interpretation services through two different vendors: Accurate Communication and Language Line Solutions. Accurate Communication provides ACS with in-person, video-remote and ASL interpretation. Language Line Solutions provides telephonic interpretation. Between the two vendors, interpretation is available to ACS-involved families 24 hours a day, 7 days a week. Accurate Communication has capacity to provide in-person and video-remote interpretation in over 150

languages. Language Line Solutions has capacity to provide telephonic interpretation in over 240 languages. Requests for interpretation are sent directly from staff to the Vendors.

Upon initial contact, ACS's frontline CPS staff members inform clients of their legal right to free language services and ask for the client's preferred spoken language for verbal communication in order to identify a client's need for language services. A Language Identification Card is used to facilitate this process. The card is a paper card that explains the right to an interpreter in nearly 100 languages. Alternatively, staff can use the language list on the Language Line app, on their phones. If it is not possible to determine a client's primary language using the Language Identification Card, telephonic interpretation services are used.

Interpretation services are provided for all interactions between ACS staff and clients who are LEP or Deaf and/or Hard of Hearing. ACS's policy is that every effort will be made to use in-person or video-remote interpreters when interactions are expected to last longer than thirty (30) minutes or planned ahead of time. The interactions include but are not limited to:

- Interviews;
- Investigations;
- Family team conferences (FTCs); and
- Other meetings with LEP families.

Telephonic interpretation services are used for interactions expected to last less than thirty (30) minutes. Those interactions for which telephonic interpretations can be used include:

- Arranging meetings with LEP families;
- A call from an LEP individual to ACS staff;
- A visit to an ACS office, without an appointment, by an LEP individual(s).

Staff and ACS clients and advocates can send any questions, concerns or complaints about language access to ACS's language access mailbox: [language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov). In addition, ACS Language Access Contract Management sends surveys to staff who request in-person and video-remote interpretation and follows up with the vendor if there were any concerns.

### ***Language Access in Agency Communications***

ACS language access services are available for community outreach events, such as "Getting to Know ACS" presentations. "Getting to Know ACS" presentations are often hosted by or presented in collaboration with community groups, including immigrant community groups.

Moving forward, the ACS Communications Team has committed to posting at least 10 Spanish language posts on Facebook and Twitter each quarter. We are also committed to securing at least five positive media stories in ethnic media outlets (including Spanish language media outlets) each quarter.

Additionally, our goal for the next LAIP is that all press releases are translated into Spanish and posted to the website.



Below is some of the work we've already secured:

#### Press

- 1/6 - NYC Launches New Program To Help Youth At Risk Of Being Victims Of Human Trafficking - TELEMUNDO 47
- 2/18 - Young New Yorkers In Foster Care Will Have Better Opportunities To Succeed – EL DIARIO NY

#### Social Media

- 1/7/2021 NYC ACS on Twitter: "Social distancing shouldn't mean social isolation. If you or someone you know is struggling, call for help. El distanciamiento social no significa aislamiento social. Si tu, o alguien que tu conoces tiene dificultades, solicita ayuda. <https://t.co/cotcAMqgrX>" / Twitter
- 3/11/2021 NYC ACS on Twitter: @ACSNYC se enorgullece de anunciar @childrensvllg, @grahamwindham, @BBCPBronx & @goodshepherd han sido seleccionados para operar en nuestros tres Centros de Enriquecimiento Familiar que proporcionan a las familias con apoyo y servicios concretos que pueden necesitar.
- 3/11 Facebook: La votación anticipada para elecciones especiales en el Bronx empieza el 3/13 hasta el 3/21 para la elección especial de 3/23. Consulte el horario y la ubicación de su sitio de votación anticipada en <http://findmypollsite.vote.nyc> #DemocracyNYC

#### ***Plain Language***

As discussed above, the agency ACS hired a consultant to help provide plain language trainings to public-facing divisions, thereby building internal capacity to write public facing documents in plain language going forward. The consultant conducted six plain language trainings across ACS's public facing divisions, including the ACS External Affairs division, which is has primary responsibility for public-facing communications. The new ACS Language Access Policy also specifies that plain language principles should be incorporated in all public facing commonly distributed documents.

#### ***Policies and Procedures***

As discussed above, ACS has updated our Language Access Policy, which has received public comment and will be seeking interim and final approval soon. The Language Access Policy unifies and builds upon previous division-specific policies and incorporates recent developments in the law. The Policy underscores that it is ACS and provider agency staff's responsibility to inform families of their right to free interpretation and to ask their language of preference for communication. The Policy lays out which type of interpretation is suitable for different situations (e.g. in-person should be used for pre-planned, longer interactions and telephonic interpretation is suitable for shorter, unplanned interactions) and which documents must be translated. In addition, the Policy has contact information for ACS Language Access Contract Management, and how to make complaints about interpretation or translation services.

### ***Notification of Free Interpretation Signage***

ACS posts free interpretation signage at each point of contact with members of the public. We are in the process of updating the posters to the signage developed by the Mayor's Office of Immigrant Affairs. ACS provider agencies are responsible for posting signage in their offices where they interact with families.

### ***Languages Beyond the Top 10***

As stated above, ACS regularly provides services for clients in many different languages, beyond the top 10 Citywide languages. ACS's interpretation and translation vendors can accommodate requests for over 240 languages. In 2020, for example, ACS requested interpretation services for clients in almost 100 different languages.

### ***Emergency Preparedness and Response***

During an emergency, such as the COVID-19 pandemic during 2020-21, ACS works with New York City Emergency Management (NYCEM) to ensure that we devise a unified, accurate and timely message to the public. Considering New York City's ethnic and linguistic diversity, ACS makes every effort to make information available and accessible to all LEP youth and families. During an emergency, language assistance and the provision of language services are provided by ACS's language access vendors. Additionally, there are 15 ACS locations where an on-site Spanish interpreter are available in the event of an emergency. Depending on the nature of the emergency, some sites may be closed and temporarily relocated. Because ACS has contracts for in-person, video-remote and telephonic interpretation, we have a wide range of language access service media which can be used interchangeably depending on the nature of the emergency. For example, if in-person interpretation is not available or not advisable, as during the current COVID-19 pandemic, ACS and Prevention staff can use video-remote or telephonic interpretation.

## **VI. Training**

ACS Office of Immigrant Services and Language Affairs (ISLA) works closely with both of ACS's training institutes (the James Satterwhite Academy and the ACS Workforce Institute) to ensure that language access training and understanding is disseminated throughout the agency. The ACS James Satterwhite Academy focuses on establishing the foundations of fundamental practice for newly hired direct service staff and supervisors. The Workforce Institute is a partnership between ACS and the City University of New York (School of Professional Studies and the Hunter College Silberman School of Social Work) to provide ongoing professional skills development for direct service staff and supervisors at ACS and its many partner agencies across the child welfare and juvenile justice sectors.

There are more than 2,000 frontline Child Protective staff who interact regularly with families, children, and members of the public. As part of their onboarding training at the James Satterwhite Academy, these staff members receive a three-hour training that includes language access, immigration and cultural sensitivity. That training includes videos that model how to explain interpretation services to members of the public; the videos also demonstrate how to speak while working with an interpreter.

The video components of that training are posted to the internal ACS intranet site and are available for all ACS staff to view at any time.

The ISLA team supplements and reinforces these trainings by providing continuing in-person trainings to ACS and provider agency staff on language access. ISLA provides almost weekly trainings to frontline staff in ACS field offices and provider agencies, and tracks which teams have received training recently, and which teams might benefit from refreshers. In addition, to build on the initial trainings and increase capacity for training the thousands of frontline staff across ACS and provider agencies, ISLA is working closely with ACS's Workforce Institute to develop a new e-learning course on working with immigrant families, which will include a language access component. We expect the training to be finalized and rolled out in summer of 2021. Once finalized, the e-learn will be available to any ACS or provider agency staff to watch from their computer at any time, thereby greatly increasing the Agency's training capacity.

## **VII. Record Keeping and Evaluation**

As discussed previously, ACS is mandated to use the statewide database CONNECTIONS (CNNX) to track casework data for child welfare services cases. ACS has been working closely with the state agency who oversees us, OCFS, to update the way we collect language data for clients. As of the end of 2020, CNNX updated the "Language" field to clarify that it is referring to the person's "Preferred Language" and added a specific question asking about English proficiency for each individual. We anticipate that these changes will aid caseworkers in meetings clients' language needs and will help ACS ISLA in more precise record keeping on the number of LEP individuals served.

In addition, by centralizing the language access contract management in the Office of Immigrant Services and Language Affairs, the ACS office which is responsible for monitoring the efficacy of the Agency's Language Access Plan and Policy and our compliance with Local Law 30 is the same as the office that monitors the delivery and quality of our language services, better enabling the agency to meet the needs of our LEP client population. The consolidation of language services in the ISLA office means we are better able to use data from the language access contracts to drive programmatic decisions on how best to meet the language access needs of our client population. We have been able to compare information about language as tracked in our Connections database with the information we have received from our vendor, to ensure that language services are being requested in proportion to our understanding of our LEP client language needs. In addition, ACS ISLA has already started sending surveys to all ACS and provider agency staff after their interpretation sessions and expanding and building upon our current feedback mechanisms is one of our top goals for the next three years.

## **VIII. Resource Analysis and Planning**

As discussed above, ACS has consolidated our language access work into the ACS Office of Immigrant Services and Language Affairs. ACS has hired a fulltime, dedicated Language Access Contract Manager and also added team members from the NYC ReServe program and Americorps VISTA, who provide support to ACS's language access work. ISLA also works closely with leadership in every ACS division to ensure language access best practices are incorporated into all our work with families. In addition, ISLA benefits from the outstanding support of the language access team at Mayor's Office of Immigrant Affairs, who provides invaluable ongoing training, technical support and materials for the ISLA team, which is then passed onto the Agency.

Other areas of collaboration include:

- Citywide Materials: ACS will use standardized signage and materials provided by the Mayor’s Office for Immigrant Affairs;
- Citywide Services: ACS will obtain translation and interpretation contracting services through contracts held by DCAS;
- ACS Office of Advocacy and 311: ACS Office of Advocacy receives all 311 language access complaints and other language access complaints from the public through walk-ins and phone calls, and works with ISLA to resolve those complaints;
- ACS’s internal training institutes, including the James Satterwhite Academy and the Workforce Institute;
- ACS’s HR department, who will work toward hiring of bilingual staff;
- ACS’s Communications team, to ensure outreach is being made to ethnic media and press releases and social media are available in translation.

As discussed above, ACS invests heavily in our language access services. In the latest full contract year (2019-2020), ACS spent \$751,472.40 on telephonic interpretation services, \$420,247.72 on in-person interpretation services; \$284,221.72 on ASL interpretation, \$236,155.19 on onsite Spanish interpretation and \$100,478.52 on written translation services.

## **IX. Outreach and Public Awareness of Language Access Services**

ACS recognizes the importance of outreach and public awareness of language access services, and we will continue to build on ongoing outreach initiatives. The Office of Immigrant Services and Language Affairs now sits within the Division of External Affairs, whose goal is public awareness. This restructuring allows the agency to keep language access considerations front and center in our public awareness work. ISLA collaborates regularly with our Communications and Marketing teams.

Our goal is to ensure that the youth, families and communities ACS serves are aware of their right to free language services. ACS Office of Immigrant Services and Language Affairs (ISLA) meets regularly with community advocates and explains ACS’s language access services and the language access complaint system to the advocate community directly. For example, the ACS Office of Immigrant Services and Language Affairs chairs the “Supporting Immigrant Children and Families Working Group,” which is made up of over 100 community child welfare advocates and ACS staff and meets on a semi-annual basis. Language access rights and concerns are regularly discussed in these meetings. This collaborative working group also fosters direct relationships between ISLA and advocates, and advocates know to reach out directly to ISLA on any individual case needs concerning immigration and/or language access or for general questions about ACS language access policies and procedures.

Furthermore, as discussed above, ISLA conducts regular trainings on language access at ACS and our provider agency offices throughout the city. In addition, language access services are discussed in ACS’s “Getting to Know ACS” presentations, which are given to community groups and public sector partners across the city to help explain the child welfare, juvenile justice and early child care programs and policies. The language access mailbox ([language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov)), where clients can make any language access inquiry or complaint, is listed on the ACS website.

## **X. Language Access Complaints**

Members of the public can submit language access complaints through multiple media: by calling 311, reaching out the ACS Office of Advocacy (by phone, email or walk in) or by directly emailing the dedicated ACS Language Access mailbox ([language.access@acs.nyc.gov](mailto:language.access@acs.nyc.gov)), which is listed on our website (<https://www1.nyc.gov/site/acs/about/immigrant-services.page>). Language access questions are then routed to the relevant programmatic division and the Office of Immigrant Services and Language Affairs, who look into the complaint and respond accordingly. In the next three years, one of the Agency’s goals is to more systematically and proactively elicit feedback (including complaints) directly from clients and advocates, to help support our quality assurance for language access services.

#### **XI. Implementation Plan Logistics**

<b>Language access goal</b>	<b>Milestones</b>	<b>Responsible Staff</b>	<b>Deadline</b>
Goal 1	ACS training institutes (the James Satterwhite Academy and the Workforce Institute) will update their trainings to reflect the new ACS Language Access Policy.	James Satterwhite Academy and the Workforce Institute	December 2021
Goal 1	Every ACS public-facing division and provider agency will receive training and/or guidance on the new Language Access Policy and its implications for their work.	ACS ISLA	December 2023
Goal 1	ACS has updated and distributed division- and provider agency-specific Language Access Desk Aids with information about the new Language Access Policy and its implications for their work with LEP clients.	ACS ISLA	Annually, starting by December 2021
Goal 2	ACS has developed a system to request and receive feedback from ACS and provider agency staff for all in-person and video-remote interpretation sessions.	ACS ISLA	December 2021
Goal 2	ACS has developed a system to request and receive feedback from ACS clients and advocates about interpretation sessions.	ACS ISLA	December 2022

Goal 2	ACS regularly reviews feedback from interpretation sessions survey and analyzes trends to promote quality assurance with language access vendors.	ACS ISLA	December 2021
Goal 2	ACS has assessed the ability of the Agency to increase the number of bilingual staff through recruitment, the use of the selective certification hiring process and developing a certification system by which ACS staff can be certified for fluency in languages other than English and voluntarily provide services directly in those languages, rather than needing to use a third-party interpreter.	ACS ISLA and HR	December 2022
Goal 3	ACS has presented to provider agencies and community groups about our language access services and ACS's language access program, specifically on families' rights to free interpretation services, that requesting services will not prejudice their cases, and how and where to provide feedback on their language access experience.	ACS ISLA	December 2021, and ongoing
Goal 3	ACS ISLA has met with Parent Advisory Council and Youth Leadership Council to discuss ACS's language access work. ACS ISLA has received feedback from the councils and used the feedback to inform service delivery.	ACS ISLA	December 2022, and ongoing

Goal 3	All ACS public access offices have up-to-date free interpretation signage that is easily visible for LEP families upon entering the space.	ACS ISLA, the Division of External Affairs, the Division of Child Protection and the Division of Juvenile Justice	March 2022
Goal 3	ACS Communications Team has posted at least 10 Spanish language posts on Facebook and Twitter each quarter.	ACS Communications Team, ACS ISLA	December 2021
Goal 3	ACS Communications Team has secured 5 positive media stories in ethnic media outlets (including Spanish language media outlets) each quarter.	ACS Communications Team, ACS ISLA	December 2022
Goal 3	All ACS press releases are translated into Spanish and posted to the public website.	ACS Communications Team, ACS ISLA	December 2021

ACS will update this Language Access Implementation Plan every three years and will post it on its website.

## Language Access Policy and Implementation Plan: 2021 Update

The New York City Commission on Human Rights (“The Commission”) submits this Language Access Policy and Implementation Plan pursuant to Local Law 30 of 2017. This document is updated as of May 2021.

Name and title of Language Access Coordinator: Nicolas A. Escobar, Policy Analyst

### AGENCY MISSION AND BACKGROUND

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

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

The Commission has three primary divisions – the Law Enforcement Bureau (“LEB”), Community Relations Bureau (“CRB”), and the Office of the Chairperson. LEB is responsible for the intake, investigation, and prosecution of City Human Rights Law violations, including those that raise systemic violations. CRB, through borough-based Community Service Centers, helps cultivate understanding and respect among the City’s many diverse communities through pre-Complaint interventions, conferences, workshops, and training sessions among other initiatives. The Office of the Chairperson houses the legislative, policy, and adjudicatory functions of the Commission, engages with stakeholders on policy issues, and convenes meetings with the agency’s commissioners.

Any member of the public who believes they have been the subject of unlawful discrimination in New York City may contact the Commission by calling 311 or by calling the Commission directly at (212) 416-0197.



The Commission currently has a total staff of 129 staff members. Most of these individuals work in the Manhattan central office (22 Reade Street), which is where LEB and the Office of the Chairperson are located.

## **AGENCY LANGUAGE ACCESS POLICY AND GOALS**

Throughout the tenure of Commissioner and Chair Carmelyn P. Malalis, the Commission has been committed to making its services accessible to all New Yorkers, with a particular focus on improving access for limited English proficient (“LEP”) New Yorkers and standardizing the use of language access practices throughout the agency. As a result, the Commission has been able to fulfill the goal of providing quality resources for all people who seek our services, regardless of the language they speak. The Commission recognizes that the key to building trust in historically underserved communities, such as immigrant and non-English speaking communities, begins with communication and accessibility. To that end, the Commission has been communicating to current and new staff that language access is one of the core priorities of the agency, and to that end requires all staff to be trained on Language Access procedures annually.

## **LEP POPULATION ASSESSMENT**

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

According to the U.S. Census Bureau’s data on “Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over: 2015-2019”, residents who live in the New York area who speak English less than “very well” are most likely to speak: Spanish, French, Haitian Creole, Italian, Portuguese, German, and Yiddish. <sup>1</sup>

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

Since 2017, the Commission has been using a case tracking system which allows staff to flag the need for interpretation and translation for each individual who contacts LEB through the Commission’s Infoline to ensure appropriate services throughout the life of a case, regardless of whether the case is transferred among different staff members. From the beginning of July 2019 to the end of June 2020, the Commission fulfilled 866 requests for interpretation through multilingual staff and the use of Voiance, with which the Commission has a contract for interpretation. The Commission maintains this information organized by language, which is used to inform the Commission’s staffing needs and translation and interpretation priorities.

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<sup>1</sup><https://data.census.gov/cedsci/table?q=ACSDT5Y2012.B16001&g=0400000US36&tid=ACSDT5Y2019.B16001&hidePreview=true>

Of the 866 fulfilled requests for interpretation in Fiscal Year 2020, 790 inquiries were in Spanish, while Russian, Mandarin, and Cantonese followed as the other top requested languages. These languages, as well as the other languages mandated by Local Law 30, are all included in the Commission's language access policies. Based on our data, we believe that the ten languages mandated by Local Law 30 cover an overwhelming majority of our needs and all other translation will be performed on a case-by-case basis.

Furthermore, the Commission's CRB has hosted workshops and events in the following languages other than English: American Sign Language, Arabic, Chinese, French, Haitian Creole, Japanese, Korean, Spanish and Tagalog. These events were attended by 5,226 people during Fiscal Year 2020.

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

The Commission's goal is that all people who seek our services, regardless of the language they speak, are treated with dignity and respect, and are afforded meaningful access to services. This plan, like previous ones, will continue to reflect the Commission's commitment to providing language access services and meeting the following goals:

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

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

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

During Fiscal Year 2020, the Commission spent approximately \$41,663 on language access services including over-the-phone interpretation, written translations, updates to the translation of our online Sexual Harassment training, and on-site interpretation.

<b>LANGUAGE ACCESS FY'20 VENDOR &amp; COST BREAKDOWN</b>		
<b>TYPE OF SERVICE</b>	<b>VENDOR</b>	<b>AMOUNT</b>
Professional Vendor for Translations	Langalo, Human Touch	\$12,792.00
Over the Phone interpretation	Voiance	\$5,813.11
In-person (virtual) interpretation	B&N Interpreting Services	\$13,158.00
Update to the Sexual Harassment Online interactive training	Eriksen Translations Inc.	\$9,900.00
	<b>GRAND TOTAL</b>	<b>\$41,663.11</b>

## **PROVISION OF LANGUAGE ACCESS SERVICES**

### **A. Commission Law Enforcement Bureau**

The Commission's Law Enforcement Bureau continues to interact with members of the public by phone and, when not working fully remotely due to the pandemic, in a variety of face-to-face meetings. A member of the public will generally contact LEB by calling 311 or by calling the Commission's Infoline directly. During CY 20, LEB's Infoline staff was able to conduct the initial phone assessment in five languages (Spanish, French Creole, Hindi, Urdu, or Nepali) through in-house capacity. If the individual speaks a language other than the six identified, Infoline staff immediately calls a phone interpreter through the Commission's vendor, Voiance. If an appointment is made for the individual to meet with an attorney, supervisors who assign intakes attempt to assign an attorney who speaks that language for the interview and if no staff with the requisite language skills is available, the attorney will use phone interpretation by Voiance during the interview. Currently, LEB has 41 staff members who speak a total of 12 languages other than English.

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

The Commission's Law Enforcement Bureau previously translated fifteen commonly distributed documents into ten designated languages. These documents are defined as those that are regularly sent to parties in the investigation, enforcement, and mediation processes. As the Commission develops new print and web materials for large-scale distribution, it has continued to use a certified outside vendor to translate materials. Once documents have been translated by

outside vendors, the Commission identifies staff internally or through the Volunteer Language Bank to review the accuracy of translation before they are made available to the public. All of our materials are offered on our website and in print by request.

## **B. Community Relations Bureau**

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

## **C. Commission-Wide Policies and Practices**

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

To further the Commission's accessibility to diverse language speakers, the Commission's Office of Communications and Marketing has maintained its record of allocating 100% of its advertising budget in community and ethnic press and, as necessary, producing those advertisements in-language for key audiences. This allows the agency to maintain an open dialogue with some of our city's hard-to-reach communities.

Outreach to non-English speakers remains a priority for Commission announcements and public education campaigns. The Commission will continue its longstanding relationship with non-English news outlets and organizations for key event partnerships.

## **TRAINING**

The Commission requires that all staff receive regular training on language access and how to provide appropriate services to LEP members of the public who are accessing the Commission's services. The Commission will continue to train all staff as to all facets of this policy and its implementation on an annual basis and all newly hired staff will be trained on this policy during the on-boarding process. Topics of the training will include: the protocol for use of bilingual staff; the procedure for providing or arranging for the provision of interpretation

services; means of identifying a LEP individual's primary language; the use of Voiance phone interpretation services; and cultural competency for working with LEP individuals. The training is, and will continue to be, conducted by the Managing Director for Education and Compliance and is regularly updated with approval from the agency's Language Access Coordinator.

## **RECORD KEEPING AND EVALUATION**

The Commission tracks requests for both interpretation services and translations through LEB's case-tracking system (Microsoft Dynamics) and has added this capacity to track trainings and outreach by CRB. The Commission has also developed and implemented means for evaluating the quality of the services it provides to LEP individuals. This includes seeking feedback from LEP individuals as to their level of satisfaction with the services they have received through evaluation forms and/or surveys after trainings, presentations, and meetings. Commission staff have also received feedback on the accuracy and effectiveness of interpretation and translation services, particularly at Commission-led events or initiatives, from our community partnerships with houses of worship, advocacy groups, and community organizations that serve a wide range of LEP populations across the city. The Commission's Annual Report also includes a breakdown of inquiries to our Infoline by members of the public whose preferred language is not English, with Spanish maintaining its position as the most requested language. The Commission's Language Access Coordinator, in partnership with staff in all departments, has been monitoring the efficacy of this plan and compliance with Local Law 30.

## **RESOURCE ANALYSIS AND PLANNING**

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

## **OUTREACH AND PUBLIC AWARENESS**

The Commission's Community Relation Bureau has been working to increase its outreach to various immigrant communities throughout the city and partners with community-based organizations, houses of worship, sister agencies, local elected officials, and others to expand the Commission's reach and connect with immigrant and LEP communities. The Commission has also made available all of its latest major agency publications in ten languages other than English. These publications are available for download on the Commission website and in print on demand. The Commission has also continued its ongoing efforts and investment in New York City's diverse community media outlets and has been persistent with outreach and

advertising placement in media most relevant to the communities the Commission serves. Since the beginning of the tenure of Commissioner Malalis, the Commission has kept an open dialogue with some of our city's most vulnerable and hard-to reach communities and has continued to produce advertisements in various languages to be placed in ethnic print media, including Arabic, Bengali, Spanish, Chinese, Korean, and Urdu. The Commission will continue to focus its advertising budget on community and ethnic media in multiple languages. In addition, like other City agencies, the Commission maintains its website in a manner that allows for direct translation into numerous languages other than English.

## **LANGUAGE ACCESS COMPLAINTS**

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

## **IMPLEMENTATION PLAN LOGISTICS**

The Commission has consistently utilized the resources discussed in this report, as well as using any other resources that become known or available, in order to assure continued improvement in the quality of the interpretation and translation services provided. The Commission is committed to full compliance with Local Law 30 and will continue to prioritize efforts to ensure that our services are known and accessible to LEP communities. To that end, the Language Access Coordinator, Policy Analyst Nicolas A. Escobar, will oversee the implementation of this plan, as well as monitor its effectiveness. The Language Access Coordinator will review the Plan at least annually, and modify it as needed.

The Commission will continue to:

- Train all staff on the updated Language Access Plan and cultural competency in working with LEP individuals;
- Prioritize the hiring of staff to increase internal language capacity to reflect the Commission's service population;
- Ensure social media content is consistently published in languages in addition to English;
- Develop trainings and presentations in Spanish, Russian, French, Mandarin, and Haitian Creole, and other additional languages;
- Perform strategic outreach to ethnic media that serve LEP communities in the five boroughs in the form of advertisement, press stories, and panel discussions with reporters and editors working at these media outlets;
- Create citywide media campaigns with components translated into languages other than English;

- Translate major Commission materials into at least ten languages in addition to English;
- Plan outreach events to LEP communities; and
- Improve data collection systems to track LEP individuals seeking the Commission's services.

# NYC Civilian Complaint Review Board

## Language Access Implementation Plan

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

The Language Access Coordinators for the New York City Civilian Complaint Review Board (CCRB) are Senior Investigations Managers Edwin Peña and Jessica Peña. The contact information for both Language Access Coordinators is located on the main page of the agency's website.

### II. Agency mission and background

The CCRB is an independent agency. It is empowered to receive, investigate, hear, make findings, and recommend action on complaints against uniformed members of the New York City Police Department (NYPD) alleging the use of excessive or unnecessary force, abuse of authority, discourtesy, or the use of offensive language. The agency also investigates the truthfulness of statements made by members of service during a CCRB investigation. The Board's investigative staff, composed entirely of civilian employees, conducts investigations in an impartial fashion. It also mediates complaints through meetings with the officer, the complainant and trained mediator. The Board forwards its findings to the Police Commissioner, who has final authority over the disposition of police disciplinary matters. On April 2, 2012, the NYPD and the CCRB signed a Memorandum of Understanding (MOU), which authorized the CCRB to prosecute substantiated cases where the Board recommended "charges and specifications," the most serious discipline. These cases are prosecuted by a team of attorneys from the CCRB's Administrative Prosecution Unit (APU). A 15-member Board governs the CCRB, with five members appointed by the Mayor, five appointed by the City Council, three designated by the Police Commissioner, one appointed by the Public Advocate, and the Chair is jointly appointed by the Mayor and City Council.

In fulfillment of its mission, the Board has pledged:

- To encourage members of the community to file complaints when they feel they have been victims of police misconduct.
- To encourage all parties involved in a complaint to come forward and present evidence.
- To investigate each allegation thoroughly and impartially.
- To make objective determinations on the merits of each case.
- To recommend disciplinary actions that are fair and appropriate, when the investigative findings show that misconduct occurred.
- To respect the rights of the civilians and officers.
- To engage in community outreach to educate the public about the agency and respond to concerns relevant to the agency's mandate.
- To report relevant issues and policy matters to the Police Commissioner.
- To offer civilians and officers the opportunity to mediate their complaints to promote understanding between officers and the communities they serve.

The Board appoints an Executive Director, who in the year 2020, had a staff of 192 employees, 123 in the Investigations Division, six in the Mediation Unit, six in the Outreach and Intergovernmental Affairs Unit, 11 in the APU, and 46 in the Administrative Division. The Administrative Division is comprised of four in the Human Resources Unit; two in the



Communications Unit; six in the Management Information Systems Unit, 6 in the Operations Unit, six in the Policy Unit, two in the Training Unit, 10 in the Case Management Unit, seven in the General Counsel’s Unit, three in the Executive Staff, and five noted as additional staff. The CCRB is located at 100 Church Street, 10th Floor in Manhattan.

In 2020, the CCRB received 3,871 complaints that fell under its jurisdiction. Most of the complaints received by the agency are referred to the CCRB by the NYPD’s Internal Affairs Bureau (IAB). Civilians can file complaints in person, in writing, by email, by calling the CCRB or 311, via the agency’s website, at police stationhouses throughout the City, or at designated City Council members’ offices. Most complaints are filed by phone—either with an investigator during normal business hours or by phone-recorded message during non-business hours. The vast majority of complaints require that the complainant appear for an in-person interview with an investigator to gather more facts about the case. If the case is suitable for mediation, and if the civilian and officer agree to mediate the complaint, complainants attend a mediation session with the officer and a trained third-party mediator. In 2020, the CCRB conducted nearly 3,000 civilian interviews and had approximately 50,000 instances of telephone contact with members of the public.

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

The CCRB aims to continue to make agency services accessible to New Yorkers with limited English proficiency (LEP). Accordingly, the CCRB will standardize and expand its use of language access practices for services that include communication with members of the public.

The CCRB will seek to draft regulations that set forth requirements for:

- Translating documents containing essential information regarding the agency in the 10 designated citywide languages outlined in LL30.
- Making interpretation services available to LEP individuals.
- Collecting data regarding the primary language spoken by these individuals and whether such person requires language assistance to communicate with the CCRB.
- Increasing awareness regarding LEP individuals’ right to and the availability of language access services.

Implementing this Language Access Plan will allow the CCRB to better serve the LEP population and consequently the agency will be able to memorialize and track this population’s concerns with respect to police misconduct more accurately.

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

<b>Goal</b>	<b>Update</b>
<b>Provide training to newly hired investigators</b>	<b>The first Language Access training session was provided on October 2020 to eight newly hired investigators.</b>
<b>Create a folder to house all translated documents related to the investigations division by language</b>	<b>This folder was created and is being updated as documents are translated.</b>
<b>Renew contracts with private vendors</b>	<b>The contracts were renewed in 2020</b>

<b>Translate essential documents commonly distributed to LEP in accordance to LL30</b>	<b>A portion of the essential documents have been translated. The agency is seeking additional funds to translate the remaining of the documents.</b>
<b>Distribute Language Access Policy to staff</b>	<b>A memo was disseminated to staff in July 2019</b>

## V. LEP population assessment

The CCRB will utilize the United States Department of Justice (DOJ) “Four Factor Analysis” to aid the agency in determining its LEP client’s language access needs and to evaluate service:

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

The CCRB looked at citywide data to assess the number or proportion of LEP persons and their languages in the eligible service population for our investigations, administrative prosecution, and outreach units. According to data from the American Community Survey, 48.5% of New Yorkers above the age of five, or approximately four million New Yorkers, speak a language other than English at home and almost 25%, or 1.8 million persons, are not English proficient.

For individuals who are not English proficient, interacting with City government can be a challenge. In February 2017, the New York City Council passed Local Law 30 (LL30), which required all City agencies to appoint a language access coordinator, develop language access implementation plans, provide telephonic interpretation in at least 100 languages, translate their most-distributed documents into the 10 designated citywide languages, and post signage about the availability of free interpretation services, among other requirements. Based on data from the U.S. Census Bureau and the New York City Department of Education, the New York City Mayor’s Office of Immigrant Affairs (MOIA) identified the ten citywide languages as: Spanish, Chinese, Russian, Bengali, Haitian-Creole, Korean, Arabic, Urdu, French, and Polish.

### **DOJ Factor 2 – The frequency with which LEP individuals come into contact with the agency:**

The CCRB engages with LEP individuals who appear in-person, contact the agency via phone or our website, or who interact with our outreach unit. The CCRB received an estimated 43 requests per month, out of approximately 517 requests, for interpretive services that require outside assistance. In the past year, the CCRB has made requests for outside interpretive services in 17 different languages serving over 120 LEP individuals. The top languages that require interpretive services are Spanish, Mandarin, Russian, Haitian-Creole, and Bengali. This figure, however, underestimates the agency’s language services because it does not include the assistance provided by our bilingual employees who are fluent in Spanish, Mandarin, Korean, Twi, Bengali, Urdu, Tamil, Akan, French, Italian, Yoruba, Hindi, Japanese, Cantonese, Russian, and Arabic.

On the second Wednesday of every month, the CCRB holds a public meeting that is open to the public. Board meetings provide an opportunity for members of the public to testify before the board on the topic of police oversight. A sign language interpreter is available for every public hearing. Foreign language interpreters are provided on-demand.

The CCRB determines the frequency with which it interacts with LEP individuals by conducting periodic examinations of interpretation and translation reports from its language service vendors.

**DOJ Factor 3 – Explanation of the nature and importance of the program/services for the LEP person requiring language assistance:**

The CCRB receives, investigates, mediates, hears, make findings, and recommends action on complaints by members of the public against uniformed members of the NYPD alleging excessive or unnecessary force, abuse of authority, discourtesy, or the use of offensive language. It is important for CCRB to be able to communicate effectively with all stakeholders involved when investigating a complaint. Lack of language services may result in an inability to conduct a thorough investigation into an incident. Language access should not be a barrier to filing a complaint with the agency.

**Factor 4 – The resources available to the agency and the cost of providing language services:**

The agency contracts with translation, in-person, sign language and telephonic interpretation vendors through the Department of Citywide Administrative Services (DCAS) language service contracts.

Language Line Services and Legal Interpreting Services

The CCRB provides interpretation services over the phone, in the field, and in its office through Language Line Services and Legal Interpreting Services. These vendors provide telephonic interpretation services in over 180 languages.

Geneva World Wide/Accurate Communication/Legal Interpreting Services

These vendors are utilized for the translation of documents.

LC Interpreting/Legal Interpreting Services

Legal Interpreting Services provide sign language interpreters for CCRB public meetings. LC Interpreting provides sign language as well as CART Captioning.

The CCRB employs non-certified bilingual staff, who can engage directly with LEP individuals when necessary.

Multi-language signs are posted to advise LEP individuals of the availability of free interpretation services. These signs are prominently displayed in all publicly accessible areas within the CCRB offices.

The CCRB posts various items on its website that are translated into foreign languages, including information regarding the agency's jurisdiction, its mediation program, the many ways of filing a complaint, and how complaints are resolved. Some of the translated pamphlets give information about what to do if you are stopped and frisked by police. Additionally, the CCRB's homepage can be accessed via an online translation tool that covers more than 200 languages.

In 2020, the agency spent \$42,331.30 in providing language access services to LEP individuals. The agency is exploring the purchase of special dual handset telephones for accessing the interpretation services of Language Line at the CCRB offices.

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

### **Translation Services**

The CCRB's most essential and frequently-distributed documents, such as forms, correspondences and informational brochures about its services, are translated into Spanish, Chinese, Haitian- Creole, Italian, Korean, Arabic and Russian. These documents were translated by Geneva World Wide. The agency is in the process of securing funding from the Office of Management and Budget to translate all essential documents in the 10 designated Citywide languages outlined in LL30. The Language Access Coordinators and the General Counsel's office will determine which documents are deemed essential.

CCRB brochures are available on the agency's website in the languages cited above. Palm cards and printed material geared towards the LGBTQIA community are translated into Spanish.

At the moment, when an LEP individual is required to fill out and/or sign a document that has not been translated, the CCRB staff member has the interpreter verbally translate the information in the document to the LEP individual in the person's native language before the individual completes and/or signs the document.

To ensure the CCRB staff is aware of the process of requesting translated materials, an internal memo is disseminated to the staff outlining how to request documents for translation. The CCRB is creating an email address for language access related matters that will be monitored by the Language Access Coordinators. Staff will use this email address to request translation of any needed agency documents. The Language Access Coordinators will liaise with the agency's Operation Unit to ensure that the documents are translated by the contracted vendor within one business day.

### **Interpretation Services**

The CCRB requires that its staff provide interpretation and translation services to individuals whose primary language is not English. These services are provided either in-person, in the field, or to those seeking assistance by telephone.

CCRB is committed to hiring staff that reflect the diversity of the city. Many of the members of the agency's investigative staff are bilingual and are able to provide immediate assistance to LEP individuals.

If an LEP individual appears at the CCRB offices and a bilingual staff member that can assist this individual in this person's native language is not available, the CCRB will contact the Language Line Services for telephonic interpretation. The CCRB does not rely on bilingual staff members to provide in-depth interpretation. The bilingual staff members are utilized to provide immediate guidance or assistance until a certified interpreter is connected with the LEP individual. When scheduling an in-person appointment with an LEP individual at the offices of the CCRB or in the field, the CCRB arranges for a certified interpreter to conduct the interpretation.

The CCRB is exploring the ability to offer LEP individuals with on-demand video interpretation services. In addition, the agency will be examining the possibility of certifying a number of its bilingual staff members as interpreters and/or translators.

## **Language access in agency communications**

### **Citywide Meetings**

The agency holds a public board meeting every month. Interpreters are provided upon requests made by the event host(s) or expected attendees. The CCRB ensures that an American Sign Language interpreter is present for every meeting.

### **Outreach**

The CCRB's contact information is posted in every police stationhouse in English and Spanish. These posters are considered essential documents and the agency will prioritize their translation into the remaining eight languages, as required by LL30. The CCRB will periodically re-evaluate whether contact posters need to be translated into additional languages depending on the communities that are being served. All essential information on the CCRB's website can be translated into 113 languages with the assistance of the Google Translate tab located within the website.

In 2020, our Outreach and Intergovernmental Affairs staff conducted approximately 600 presentations. While most of these presentations were in English, some presentations were conducted in other languages, including Spanish and Arabic. In 2021, the Outreach and Intergovernmental Affairs staff will be expanding its outreach to ESOL (English Speakers of Other Languages) communities and communities where English is not the predominant language. Upon request, Outreach presentations will be given in any language.

### **Plain language**

The written material that is disseminated to the public is drafted in a way that is easy to understand. Staff members from the agency's General Counsel's office will undergo plain language training and review the frequently-distributed documents to ensure that they adhere to the plain language guidelines.

### **Policies and Procedures**

In July 2019, a memo was distributed to all members of the CCRB staff documenting the commitment of the CCRB to provide Language Access services to LEP individuals via interpretation. This memo will be updated to incorporate the procedure to be followed when interacting with an LEP individual and how staff members can request interpretation or translation services through the Language Access Coordinators. This memo will be revised as needed and distributed twice a year to reinforce the importance of providing language access services to the public.

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

There is multilingual signage posted near the CCRB's reception desk notifying all visitors of the availability of translation and interpretation services free of charge. Language Identification Cards are available at the front desk to help LEP individuals identify their language.

The CCRB's website informs the public of upcoming board meetings and provides the contact information for a member of the Outreach staff should interpretation assistance be required. The website notes that interpretation services are free of charge upon request.

### **Languages beyond the top 10**

Should an LEP individual require in-person services beyond the top 10 languages noted, a bilingual staff member would assist until a certified interpreter is contacted. The agency is exploring the use of on-demand video interpretation services to provide a faster level of assistance.

As needed, documents are translated beyond the 10 languages outlined in LL30 in order to service LEP individuals.

### **Emergency Preparedness and Response**

The CCRB does not provide emergency services to the public. In the event of an emergency in which the agency needs to provide critical information to the public (i.e., reduction in office hours or office closure), this message will be available in over 100 languages through the agency's website.

Due to challenges from the pandemic, the CCRB performed almost all of its functions digitally. Services provided by the agency to the public were continuous and only encountered minor disruptions. The CCRB website explains how civilians can file complaints with the agency and allows civilians to track the progress of their investigations. All CCRB staff members are equipped with agency-issued laptops with remote access to the agency's databases. They also have digital access to use their office phone numbers.

## **VII. Training**

As of October 2020, the CCRB's Language Access Coordinators developed a comprehensive training that is provided to all new investigators hired by the agency. This training includes all aspects of LEP policy and its implementation. Topics include: the protocols for use of bilingual staff; the procedure for providing or arranging interpretive or translation services; how to identify a LEP individual's native language; and how to utilize contracted language service vendors. A comprehensive training program like the one described above will be developed and conducted for all public-facing staff members.

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

The CCRB records the requests it receives and fills through the agency's interpretation and translation vendors. The CCRB intends to make changes to its Complaint Tracking System to capture the type of language service provided to individuals who visit the agency or file a complaint. The CCRB will then have the ability to quantify the LEP services provided in-house and over the phone.

The CCRB will also develop and implement means for evaluating the quality of the services it provides to LEP individuals. The agency will conduct periodic surveys of LEP persons and staff who use the interpretation and translation services of private vendors in order to determine the quality of the language access services. The agency will keep copies of the results of any surveys it conducts in connection with services provided to LEP persons.

The Language Access Coordinators and the agency's Training Unit will document any formal language access trainings and keep file copies of training materials.

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

To assure continued improvement in the quality of the interpretation and translation service it provides, the CCRB will continue to utilize the resources discussed above as well as any others that become known or available to the agency. Our automated case tracking system, coupled with the diversity of in-house foreign language speakers, will allow the CCRB to implement its plan and policy effectively. The CCRB is equipped to execute this very important initiative that will benefit all New Yorkers, regardless of their native language.

The CCRB has continued to request funds through the Office of Management and Budget to assist in the translation of essential and frequently-used documents. As these requests have not been fulfilled, the agency has allocated funds from its own budget to translate essential documents to bring us closer to being in full compliance with LL30.

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

The CCRB's Outreach Unit is committed to providing presentations to LEP communities. Ahead of every presentation, the community outreach team requests the assistance of the host entity to identify any potential need for interpretation services. If the need arises, these events typically will be covered with interpreters from a contracted vendor. The Outreach team conducts presentations throughout the five boroughs to a wide variety of groups, including:

- High schools, middle schools, Alternative/transfer, and colleges
- Public libraries
- Tenant associations
- Advocacy organizations
- Community groups
- Non-governmental organizations
- Religious organizations
- Community board meetings
- Precinct council meetings
- LGBTQIA-related groups
- NYCHA
- Homeless Shelters and Street Homeless Outreach organizations
- Cure Violence and Crisis Management System groups
- Immigrant Population
- Criminal Justice-Involved Adult and Youth Groups
- Fatherhood/Family Engagement programs.

In 2021, the Outreach team will seek to conduct presentations to sexworkers and victims of human trafficking.

The community outreach team offers attendees of its events a CCRB brochure that describes what to do if you have experienced or witnessed police misconduct. This reader-friendly pamphlet details the agency's jurisdiction, the many ways of filing a complaint, and how complaints are resolved. The materials are available in English, Spanish, Italian, Korean, Mandarin, Arabic, Haitian Creole and Russian ([www1.nyc.gov/site/ccrb/about/outreach/publications.page](http://www1.nyc.gov/site/ccrb/about/outreach/publications.page)). The CCRB is in the process of ensuring that these brochures will be available in all 10 languages. With the funds that the CCRB has earmarked for translation of documents, the CCRB is prioritizing making these pamphlets available in the remaining 10 languages. The Outreach unit will be coordinating with

MOIA's Outreach unit to determine best methods of servicing LEP individuals.

**XI. Language Access complaints**

The agency website lists the name, email address, and telephone number for its Language Access Coordinators. The CCRB is creating an email address where agency staff and members of the public can report any comments or complaints related to language access services provided by the CCRB.

- a. How would complaints about the quality of translation be handled by CCRB?

If there is a complaint about the quality of translation services provided by a private vendor, the complaint would be routed to the agency's Language Access Coordinators. They would investigate the complaint and notify the complainant of the results after the investigation is complete. If the complaint was in another language, the response would be translated before being sent to the complainant.

- b. How does the CCRB provide quality assurance and handle complaints of poor quality of service by a vendor?

CCRB submits complaints to vendors if we encounter quality control problems and we respectfully request plans of action from them if the problem is persistent. In regards to over the phone interpretation, the agency has a secondary contract that can be used if a problem is not solved to our satisfaction by our primary vendor. A formal protocol is being developed for using the second vendor, including documenting instances of poor-quality services and making formal complaints with the vendor and giving them the opportunity to resolve the issue.

In terms of quality assurance for document translation, the CCRB will have translated documents reviewed by bilingual employees who are fluent in the languages in which the documents are translated. Outside review will be sought if no staff member is able to review the documents.

**XII. Implementation plan logistics**

Language access goal	Milestones	Responsible staff	Deadline
Attempt to secure funding to translate all essential documents as required by LL30	Since September 2017, several requests seeking \$75,000.00 have been submitted to the Mayor's Office of Management to secure funds for this goal.	Deputy Executive Director for Administration	Unknown
Attempt to secure funding for dual headsets	September 2021	Deputy Executive Director for Administration	Unknown



Attempt to secure funding to certify bilingual staff members as interpreters and/or translators	September 2021	Deputy Executive Director for Administration	Unknown
General Counsel's office staff to receive Plain Language training	August 2021	General Counsel's office	September 2021
Create inventory of essential documents commonly distributed to the public that will be revised to ensure they adhere to plain language guidelines	October 2021	Language Access Coordinators General Counsel's office	November 2021
Begin to review of essential documents to ensure that they adhere to plain language guidelines	November 2021	General Counsel's office	December 2022
To conduct presentations within LEP communities to bring awareness of the CCRB'S mission	May 2021	Director of Outreach and Intergovernmental Affairs	June 2021
Create Language Access training for public facing staff	September 2021	Language Access Coordinators General Counsel's office	December 2022
Create a method to effectively evaluate Language Access services provided by the CCRB	October 2021	Language Access Coordinators General Counsel's office	December 2021
Formalize guidelines to investigate Language Access Complaints	September 2021	Language Access Coordinators General Counsel's office	October 2021

Update the agency's Complaint Tracking System with checkboxes that would allow to record LEP service needs of civilians in our investigations	October 2021	Director of Data Process and App Development  Acting Chief of Investigations  General Counsel's office  Language Access Coordinators	December 2021
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- I. Agency: NYC Civic Engagement Commission's Language Access Plan  
Language Access Coordinator: Francis Urroz, Civic Engagement Support Specialist

- II. **Mission and Background**

In November of 2018, New Yorkers voted for the establishment of the Civic Engagement Commission (CEC) into the NYC Charter. The CEC's mission to enhance civic participation and build public trust to strengthen democracy rests on educating New Yorkers on their rights and responsibilities and providing the necessary services to promote equitable participation in civic life. The Commission is committed to creating partnerships with and supporting the work of community-based organizations, institutions, and civic leaders in their efforts to provide inclusive and diverse opportunities for direct participation in the decision-making processes of our city.

The Commission is charter mandated to:

- implement a citywide participatory budgeting program that provides opportunities for all New Yorkers 16 years of age and older to decide how to spend public money for local community projects.
- support the technical and language access needs of Community Boards to create stronger and more inclusive opportunities for the communities they serve.
- expand access to language interpreters at poll sites throughout the city for limited English proficient (LEP) voters.
- develop new opportunities to support and partner with local organizations to strengthen civic engagement;
- create accessible and interactive civic education tools and strategies to empower and engage underserved and underrepresented communities.

Local Law 30 (LL 30) is the City's language access law which improves access to City services for all New Yorkers. LL 30 requires covered agencies to appoint language access coordinators, translate commonly distributed documents into 10 designated languages, provide telephonic interpretation in at least 100 languages, and develop and implement a language access implementation plan. Consistent with the CEC Poll Site Interpretation methodology and LL30, the Commission will provide translations in the following languages: Arabic, Bangla, Chinese (simplified Cantonese), French, Haitian-Creole, Italian, Korean, Polish, Spanish, Urdu, and Yiddish.

Note: Italian and Yiddish are eligible languages under the Poll Site Language Assistance Program.

### III. **Agency Language Access Policy and Goals**

The Commission's Language Access Policy and Implementation Plan (LAIP) aims to outline the language access supports available to LEP New Yorkers in the CEC's programs and services.

Language access is an integral part of civic inclusion in New York City where 49% of New Yorkers speak a language other than English at home and 23% are limited English proficient. The Commission's goal is to promote and facilitate civic participation for limited English proficient speakers and bridge communication barriers to engage in civic opportunities more equitably. The Commission's Language Access Policy and Implementation Plan considers accessibility to services and information to limited English speakers in all areas of direct engagement, which include:

- Creating protocols for requesting translation and interpretation services, including American Sign Language.
- Contracting professional interpretation vendors to provide over the phone interpretation and providing in-person interpretation at events.
- Contracting translation vendors to translate outreach materials in the ten designated languages under LL30 and the CEC's additional Poll Site Languages: Italian and Yiddish.
- Training CEC on the importance of language access to civic engagement, compliance ordinances, and how to access available language access resources.
- Providing residents direct access to contact the Commission to share feedback, complaints, and request engagement opportunities.
- Conduct outreach in identified languages for poll-site interpretation and in multiple languages for all other information and City services.

#### **Language Assistance Advisory Committee and Poll Site Language Assistance Program**

To further meaningful access to the electoral process, the CEC will expand poll site language assistance for LEP New Yorkers and increase awareness of poll site interpretation rights. To accomplish this work, the CEC established a Language Assistance Advisory Committee (LAAC) to provide recommendations for the development and implementation of the program. Consistent with NYC's language diversity, members of the LAAC represent the program selected languages to provide feedback on language access best practices.

## **Languages Served**

The Program will provide interpretation services in the following languages:

- Arabic
- Bengali
- Chinese (simplified Cantonese, Mandarin)
- French
- Haitian Creole
- Italian
- Korean
- Polish
- Russian
- Urdu
- Yiddish

The Commission will provide services in Bengali, Korean, and Chinese (Cantonese, Mandarin) only in counties where the New York City Board of Elections (NYCBOE) is not mandated to provide services in such languages under the federal Voting Rights Act. **See appendix A for a breakdown of poll site allocations and methodology.** \*

## **Determining the Level of Services for Each Language**

Among languages to be served by the Program, the number of poll sites that will receive services in a selected language served will depend on each language's share of the citizen voting age limited English proficient population (CVALEP \*) compared to other languages served by the Program.

Program allocations will account for the translation of outreach materials consistent with program language needs:

- Community and Ethnic Media advertisements will be translated and vetted for plain language.
- Informational videos will include translated captioning and voice-over in the LL30 and program languages.
- All literature (i.e. brochures, flyers) will be translated for canvassing and outreach purposes.
- The Commission will also work with community partners to engage LEP New Yorkers from underrepresented communities

*\*See appendix A*

## **Participatory Budgeting Program**

The Participatory Budgeting Program aims to bridge continuing gaps in knowledge and literacy about public spending, build trust with local government, and galvanize higher rates of resident participation in decision-making processes impacting New York City. The CEC's Participatory Budgeting Advisory Committee (PBAC) advises on critical program decisions, including the promotion of public education materials and outreach

strategy.

The Commission will consult both the LAAC and PBAC to create a style guide and glossary to standardize and provide cultural and programmatic context for the translation of materials provided by the contracted translation vendor.

This style guide:

- informs the translation of subtitles and voice-overs for public service announcements;
- provides consistent translation for ballots, toolkits, and training materials;
- provides consistent oral interpretation for community events
- and is integrated into all online web content, including the CEC's digital civic portal.

#### I. **Agency Language Access accomplishments and progress on goals from previous LAP**

This is the first year that the Commission is submitting a Language Access Interpretation Plan. As a newly created agency, the Commission's language access policy and goals are informed by its core mandates and initiatives. In the last year, the Commission has contracted interpretation, translation, and translation localization vendors to facilitate the provision of language services both for digital and in person outreach.

##### ***Community Boards***

Over the phone interpretation services were made available to Community Boards as well as trainings and best practices to engage LEP communities in their community district. The Commission is in the process of finalizing an internal site to host all language access resources, trainings, and toolkits.

##### ***Poll Site Language Assistance***

The Commission's Language Assistance Advisory Committee worked with the Advisor for Language Access and Community Boards to create a style guide to inform the translation of the program methodology and outreach materials used to inform voters about elections. Materials include the translation of four documents that provide voting information about the right to access interpretation services, the creation of three public service announcements translated into the LL30 languages (+ Yiddish and Italian) and provided voice over interpretation. The Commission's expenditures total \$140,250 for the translation and localized advertisement and outreach to LEP communities.

##### ***Digital Platform for Resident Participation***

The CEC created Participate NYC, a secure open source participatory

democracy platform for New Yorkers to connect to the Commission’s programs Youth Participatory Budgeting Project. The digital platform is still in its nascent phase, but it is iterative and will continue to be built in a way where it can be utilized by CEC to create as many engagement features (i.e. participatory processes, civic groups) as necessary over time, and various intake tools (e.g. surveys, proposals, meetings, assemblies) will be associated with each process. A critical part of the design and function of the platform includes localizing the idea generation features of the platform

Goal	Update
Creating protocols for requesting translation and interpretation services, including American Sign Language.	Completed. Commission created and updates their meeting toolkit to ensure timely delivery of notices to request language services.
Contracting professional interpretation vendors to provide over the phone interpretation and providing in-person interpretation at events.	In progress. The Commission contracted over the phone interpretation services for staff and Community Boards use. However, commission partnered with MOIA for translation of materials, but is currently finalizing contract with translation and interpretation vendor.
Contracting translation vendors to translate outreach materials in the ten designated languages under LL30 and the CEC’s additional Poll Site Languages: Italian and Yiddish.	See above.
Training CEC on the importance of language access to civic engagement, compliance ordinances, and how to access available language access resources.	Completed. Staff received a training and overview during staff meeting and are encouraged to attend weekly language access meetings to inform LACC of language access needs .
Providing residents direct access to contact the Commission to share feedback, complaints, and request engagement opportunities.	Completed. The public has direct access to the CEC’s online feedback survey and are encouraged to connect with CEC staff for complaints and feedback.
Conduct outreach in identified languages for poll-site interpretation and in multiple languages for all other information and City services.	Completed. The Commission utilized Community and Ethnic Media, community and city partners, and targeted advertisements to reach LEP communities.

## I. LEP Population Assessment

In accordance with LL30, the NYC Civic Engagement Commission will utilize the US Department of Justice “Four Factor Analysis” to assess resources needed for the Language Access Policy and Implementation Plan.

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

The Commission utilized citywide information to determine the proportion and number of languages spoken by LEP New Yorkers who require translation and or interpretation services to access vital services and information.

According to the Department of City Planning’s Census data analysis, 49 percent of New Yorkers (3.88 million) speak a language other than English at home, of this population, 23 percent (2 million) are limited English proficient. Expanding on executive order 120, Local Law 30 identified the following ten citywide languages, in order of number of LEP persons: Spanish, Chinese, Russian, Bangla, Haitian-Creole, Korean, Arabic, Urdu, French and Polish. Under the Charter, the NYCEC can only provide interpretation services in a language if: (1) it is a designated citywide language; or (2) it is spoken by a greater number of LEP New Yorkers than the lowest ranked designated citywide language and at least one poll site has a significant concentration of speakers of such language with LEP. The Poll Site Language Assistance Program’s Methodology uses ACS 5--year estimates as they provide a smaller margin of error than 1--year estimates and have an increased statistical reliability for smaller geographic areas and small population groups. The ACS collects samples from 3,143 counties and county equivalents in the U.S. Since 2011, the ACS has sampled 3.54 million housing unit addresses in the U.S. The ACS gathers the following social and economic characteristics needed for the methodology: age, citizenship status, language spoken at home, and English proficiency. No other survey comes close to the scope and breadth of the ACS.

### **Factor 2: the frequency with which LEP individuals interact with the agency.**

The Commission’s goal is to regularly engage with all communities through its initiatives, programs, and outreach activities. However, during election periods the Commission’s outreach and interactions will target eligible LEP individuals in the following languages: Arabic, Bengali, Chinese (Cantonese, Mandarin), French, Haitian-Creole, Italian, Korean, Polish, Russian, Urdu, and Yiddish.

### **Factor 3: the importance of benefit, service, information or encounter to**



**the LEP person:**

The Commission seeks to improve equitable participation in the city's democratic and civic processes. It is important that LEP New Yorkers receive information pertaining to civic engagement in the language they feel most comfortable speaking. This includes reaching marginalized communities who are unable to participate in the city's civic opportunities due to a lack of language and/or disability access.

**Factor 4: resources available:**

The Commission contracts with translation and in-person and telephonic interpretation vendors through the Department of Citywide Administrative Services' (DCAS) language service contracts and participates in the City's Minority and Women owned Business Enterprise Program.

**II. Provision of Language Assistance Services**

The NYC CEC provides interpretation and translation services as required by Local Law 30. All notices and information related to the NYC CEC's work will be translated in the City's official 10 languages: Spanish, Chinese, Russian, Bangla, Haitian-Creole, Korean, Arabic, Urdu, French and Polish. Further, New Yorkers may request interpretation services in languages not covered by LL30 by e-mailing the Commission's info box at [info@civicengagement.nyc.gov](mailto:info@civicengagement.nyc.gov).

**Virtual Meetings**

Public meeting notices are translated into the target language(s) of the event and contain translated information on how to access interpretation for the virtual meeting (i.e. links, phone numbers, contact e-mail), including American Sign Language and Communication Access Real Time Translation services (CART).

The Commission will conduct all public meetings via WebEx and/or Microsoft Teams for the foreseeable future. Additionally, the Commission has acquired interpretation and livestreaming equipment to streamline interpretation requests and make public meetings more accessible for in-person public meetings (once permitted).

**. Translation Services**

The Commission partnered with the Mayor's Office of Immigrant Affairs' Language Services team to provide translation of critical documents related to programming and community outreach, particularly for the translation of outreach materials for voter education. Translation services for public service announcements

and digital media were contracted through Splash Studios. Splash Studios sourced bilingual voice actors for the PSA voice over interpretation needs and provided draft materials for quality assurance and review.

Quality review of all translation materials is a critical process for the accurate dissemination of program information and to foster respect and trust in LEP Communities. Quality Assurance review is requested during the translation process and is conducted by the MOIA Language Access team as well CEC bilingual staff, community members and the LAAC.

Contracts and project management for translation requests are processed by the Language Access Coordinator and reviewed by the Advisor for Language Access. A contract for translation services is currently being processed for the remainder of the 2021 fiscal year for Eriksen Translations, a local Brooklyn M/WBE vendor. The Commission prioritizes the translation of LL30 languages for Poll Site Program outreach needs and is currently on track to provide localized translation services for the participatory budgeting digital platform and the NYC Government site.

a. **Interpretation Services**

Over the phone and in person interpretation services are accessible to CEC staff through the Language Line and Eriksen vendors, respectively. Language Access support for Community Board is a core mandate of the Commission and includes advising on best practices to engage LEP communities. Community Board have access to services 24/7 in over 200 languages through a contract with Language Line provided by the Commission.

**Poll Site Language Assistance Program**

The Commission provides interpretation services at select poll sites throughout New York City. Target paid advertisements through Community and Ethnic Media are utilized to reach LEP communities located in poll site zip codes. Furthermore, theBigWord, interpretation vendor, is contracted to provide interpreters for Early Voting and Election Day. Interpretation services for programming and community outreach events are included in the scope of work for the M/WBE contracted vendor, Eriksen Inc. The scope of work includes interpretation services for outreach events, public meetings and hearings. The Commission relies on feedback from community leaders, members, and the

LAAC to assess the quality of interpretation offered in these public spaces.

b. **Language Access in Agency Communications**

The Commission has contracted Smartling's services to provide a user-friendly translation experience for LEP New Yorkers who utilize the Commission's online resources and visit the government site for critical poll site information. This provides users human translated content for a more accurate and localized translation experience way and is accessible via desktop and mobile devices.

Looking to remainder of FY21, the Commission's press releases to Community and Ethnic Media outlets will be translated into the targeted communities' language to facilitate greater communication. Community presentations will be translated in target language for greater accessibility and comprehension. While the Commission does not have sufficient resources to translate all meeting transcripts, the Commission is working with the City's Department of Information Technology and Telecommunications to provide Google translations.

c. **Plain Language**

The Commission follows federal guidelines and best practices for the creation of plain language materials. This includes providing translation and interpretation vendors glossaries and style guides that plainly convey the Commission's programs and initiatives. The Commission works with the Mayor's Office for People with Disabilities and the Department of Information Technology's Director for web operations to train staff on accessible and plain language publications. Furthermore, the Commission attends the annual Language Access Coordinator Training provided by MOIA and Operations which covers plain language best practices around Quality Assurance/ Quality Improvement.

To ensure quality, the Commission practices incorporate:

- Streamlined file management for translation projects, which includes saving all records and files in OneDrive for ease of access.
- Created Project timelines for staff to follow to communicate feedback to vendors and community partners.
- Procured tools used to produce materials (e.g., Adobe Creative Cloud, Canva).

d. **Policy and Procedures**

Per the City's open meeting laws, the Commission provides notice

to New Yorkers via the City Record, the Commission website, Community and Ethnic Media, and Community Calendars to publicize public meetings and provide instructions on how to request oral and ASL interpretation services. The Communities are also invited to utilize the Commission's intake form to request translation of critical documents. To further access to documents that facilitate the participation of communities in the City's civic processes, the Commission works in partnership with the Department of City Planning to share best practices and feedback from the Community Boards' needs assessment, which included questions regarding access to translation services

e. **Notification of free interpretation signage**

The Mayor's Office informs members of the public about the availability of free interpretation services through digital and in person outreach, including through multilingual signage and outreach presentations. The CEC developed flyers, palm cards, and uses MOIA's "I speak Cards" to increase awareness about the availability of free interpretation. Moreover, the CEC utilizes the tools created by MOIA and the Department of Social Services found in the Immigrant Resources Portal to notify communities of available language services. Additionally, staff are instructed to provide translated signage that details to communities and community partners how to request interpretation services.

f. **Languages beyond the top 10**

The Commission provides translation and interpretation services in additional languages to reach the communities who directly benefit from the Poll Site Language Assistance Program. This means providing interpretation services beyond the City's Local Law 30 languages. Furthermore, the Commission makes additional efforts to engage speakers of languages beyond the ten designated under the law.

In order to ensure that programs engage hard-to-reach, the CEC works with partner agencies to provide interpretation in and translates materials into languages beyond the local law languages:

- Translated materials into 14 languages in response to directed outreach to specific communities during the COVID-19 rapid response phase. These languages include Nepali, Tibetan, Greek, Punjabi, Italian, Yiddish.
- Created a list of the top 5 languages spoken in the Community Districts most impacted by COVID-19 to

better integrate Ranked Choice Voting Outreach and program outreach. A breakdown of the top five languages by Community District can be found on the Civic Engagement Commission's "Community District Map" on [www.nyc.gov/civicengagement](http://www.nyc.gov/civicengagement).

g. **Emergency Preparedness**

In partnership with the Department of Health and Mental Hygiene, the Commission provides guidance to staff and contracted interpreters about the expectations and requirements to continue to provide language access services during an emergency. This includes providing outreach staff and contracted vendors the appropriate gear and conditions to conduct work effectively while meeting the needs of NYC's LEP communities.

The scope of work for the translation vendor includes a rapid response element requiring the delivery of translations into approximately 12 languages, with minimal formatting, of 500 words or less, in less than 24 hours, including some nights and weekends. Further, the Commission supports awareness and guidance related to both health-related initiatives (e.g., COVID-19 testing and vaccinations), recovery efforts, and assistance to specific initiatives (e.g., Poll Site Language Assistance, Taskforce on Racial Equity and Inclusion).

I. **Training**

To ensure that staff are aware of language access services available, the Civic Engagement Support Specialist (CESS) provides an annual training covering access to translation and interpretation services. The training addresses the following:

The importance of language access in ensuring equity and its importance to the NYCCEC's mission;

- The City's legal obligations around language access, including Local Law 30;
- The language services resources available to staff to ensure they can communicate with LEP New Yorkers and how to access those services; and
- Steps staff can take to ensure the quality of multilingual communications.
- Determine the appropriate modality of interpretation services (i.e. consecutive or simultaneous interpretation).

The Language Access Coordinator also provides review trainings on

language services and the use of interpretation equipment for staff developing materials or conducting outreach.

The Commission created a language access protocol and a one-pager guide for staff on how to request translation and interpretation services and how to use telephonic interpretation. Staff are invited to the Language Access weekly check-ins to provide updates on language access needs for program outreach to LEP communities.

## **II. Record Keeping and Evaluation**

The CESS processes and tracks the translation of materials, as well as requests and fulfillment of interpretation services. The CESS works with the CEC program advisors to review delivery of language services to identify new needs and opportunities for improvement. This review includes an assessment of demand for language services, the CEC's ability to meet demand and manage projects effectively, and any issues encountered with respect to contracted services.

As part of the CEC's strategic planning process, the CESS monitors its compliance with Local Law 30 and the efficacy of its implementation plan. The CESS and the Language Access Advisor review all outreach implementation plans to ensure that:

- a translation timeline that includes sufficient turn-around time for revision and public outreach
- identify target language (s), communities impacted, and determine if there are variations in written formats, including dialects.
- determine whether simultaneous, consecutive, or both interpretation formats will be needed for the event (in-person or virtual).

## **III. Resource Analysis and Planning**

The Commission allocates \$50,000 for over the phone interpretation services for Community Boards and Commission needs. An additional \$30,000 is allocated for translation services and \$20,000 for technical tools to human translated content. Moreover, the LAC and program advisors provide periodic reviews to improve delivery of language services and to identify gaps in provision. CEC relies on outreach by staff to LEP communities and Language Assistance Advisory Committee, monitors data releases from the Population Division of the Department of City Planning and other sources of

demographic information, and works with community partners to identify shifts in language needs and barriers to accessing civic engagement opportunities. This information helps the CEC develop and tailor multilingual information and resources for LEP. Furthermore, the Commission uses digital outreach through ad placements in program languages to reach communities through the web, radio, and print advertisements. The LAAC supports in identifying community organizations to support outreach to communities served by the Poll Site Language Assistance Program. Additionally, the LAAC reviews materials, style-guides, etc. to inform the Commission's messaging.

### **Outreach and Public Awareness of Language Access Services**

The NYC CEC recognizes the need to proactively inform members of the public on the City's obligation to provide language access. An important part of the NYC CEC's work are its collaborative partnerships with and outreach to community organizations. Through these partnerships and outreach, the CEC works to inform partners about our commitment to language access and build relationships with community and ethnic media to generate trust and transparency.

#### **IV. Language Access Complaints**

The NYC CEC respects and appreciates feedback about its own communications and engagement practices and strives to eliminate the gaps in language access to its information and services. Members of the public can contact the NYC CEC through multiple channels to make a complaint or request additional language services.

- By mail: 255 Greenwich Street, 9th FL, New York, NY 10007
- Email: [info@civicengagement.nyc.gov](mailto:info@civicengagement.nyc.gov)
- Website contact page: [www.nyc.gov/civicengagement](http://www.nyc.gov/civicengagement)
- Telephone (with interpretation available): (646)-769-6026

Any member of the public can also call 311 to make a complaint about language access at the CEC. Language Access complaints are tracked through the intake form. All correspondences are archived and logged. To this date the Commission has not received language access complaints. The Commission

#### **V. Implementation Plan Logistics**

<i>Language Access Goal</i>	<i>Milestones</i>	<i>Responsible Staff</i>	<i>Deadline</i>
<i>Localized translations for digital communications.</i>	<ul style="list-style-type: none"> <li>Finalize cyber security vetting process</li> </ul>	CESS	Calendar Year 2021, Q3
<i>Integrate localized translation for civic digital portal</i>	<ul style="list-style-type: none"> <li>Create plan for localized translation and find alternatives to real time translations for community comments.</li> </ul>	CESS and PB Advisor	Calendar Year 2021, Q4
<i>Translation Tracker</i>	<ul style="list-style-type: none"> <li>Create archive folder for all translated documents and track all documents submitted for translation</li> </ul>	CESS	Calendar Year 2021, Q4
<i>Public Awareness about RCV Education in LL30</i>			
<i>Conduct community workshops for RCV and Poll Site Language Assistance for hard to reach communities</i>	<ul style="list-style-type: none"> <li>CEC will work to inform the public about access to language services</li> </ul>	CESS in partnership with program advisors.	Calendar Year 2021, Q4

## Appendix A

### NYC Civic Engagement Commission: Methodology for Poll Site Language Assistance

#### Languages Served

- What languages will the Civic Engagement Commission (NYCCEC) provide services in?



- Arabic, Bengali, Chinese (Cantonese, Mandarin), French, Haitian Creole, Italian, Korean, Polish, Russian, Urdu, and Yiddish<sup>1</sup>.
- Why is the NYCCEC providing services in these languages?
- - Under the Charter, the NYCCEC can only provide interpretation services in a language if: (1) it is a designated citywide language; or (2) it is spoken by a greater number of LEP New Yorkers than the lowest ranked designated citywide language and at least one poll site has a significant concentration of speakers of such language with LEP. <sup>2</sup>
  - This methodology ensures service for all languages that are eligible under the Charter.
- What language assistance services does the Board of Elections provide?
  - The NYC Board of Elections currently provides language assistance in the following counties and languages:
    - New York: Spanish, Chinese (Cantonese, Mandarin)
    - Kings: Spanish, Chinese (Cantonese, Mandarin)
    - Queens: Spanish, Chinese (Cantonese and Mandarin), Korean, Bengali, Hindi, and Punjabi
    - Bronx: Spanish
    - Richmond: Spanish
- When will the NYCCEC begin providing interpretation services?
  - The general election held on November 3, 2020. This methodology will be used to inform how interpretation services will be provided this November and for all elections thereafter.
- Will the NYCCEC provide interpretation services during the early voting period?
  - NYCCEC will provide interpretation for the full day on the last two weekend days before Election Day for any U.S. presidential primary, general, or special election for a Citywide elective office or any statewide elective office.
  - The NYCCEC will consider providing interpretation services on additional early voting days after considering data about early voting utilization over time.

## Data Used

- What data is the NYCCEC relying on to design this methodology?

- For citywide estimates, this methodology uses current data from the American Community Survey (ACS) 2014--2018 5--year estimates.
  - This methodology also uses the American Community Survey Census Tract 2013--2017 5--year Public Use Microdata Samples for poll site level analysis; this is the most current and accurate data available on resident New Yorkers at the neighborhood level.
  - In addition, the methodology uses data from the Board of Elections on the location of election districts and poll sites.
  
- Why is the NYCCEC using data from the American Community Survey?
  - The NYCCEC is using ACS 5--year estimates as they provide a smaller margin of error than 1--year estimates and have an increased statistical reliability for smaller geographic areas and small population groups.
  - The ACS collects samples from 3,143 counties and county equivalents in the U.S. Since 2011, the ACS has sampled 3.54 million housing unit addresses in the U.S. The ACS gathers the following social and economic characteristics needed for the methodology: age, citizenship status, language spoken at home, and English proficiency. No other survey comes close to the scope and breadth of the ACS.
  
- Why is the NYCCEC using American Community Survey data about citizenship and voting age? Why not use data about residents and younger New Yorkers? Why not use data on ethnicity and race?
  - The goal of the Poll Site Language Assistance Program is to serve registered voters with limited English proficiency.
  - On an annual basis, the ACS provides a snapshot of changes in this population. In the early part of the decade, the ACS showed the CVALEP population growing by 7,500 annually, by 12,000 annually in the middle part of the decade, and by 25,000 in the most recent period. Thus, the ACS is able to track how this population changes each year – the average increase over the decade was roughly 10,000 per year.
  - The best indicator of limited English proficiency in the ACS is a measure of how well a person speaks English. The NYCCEC uses this variable in conjunction with language spoken at home to determine the spread of languages across the City. The ethnic background/self--identified race of individuals is not relevant for data analysis.

- How often does the U.S. Census Bureau update the American Community Survey? And are there “gaps” in the data because it is not updated frequently enough?
  - The ACS is conducted each year, and it takes several months to prepare the data for public use. If the most recent data were used for the methodology analysis of the CVLEP population, the data would be no more than 14 months old. At the neighborhood level, there is nothing else available on the CVLEP population that would be more current or accurate than the 5--year estimates.
- If a New Yorker recently became eligible to vote (through naturalization or by turning 18--years--old) would that person show up in the most recent American Community Survey data?
  - If a New Yorker recently became eligible to vote through naturalization or by turning 18--years--old, the most recent ACS sample would reflect this emerging voter population. In the early part of the decade, the ACS showed the naturalized population growing by 15,000 annually, by 37,000 annually by the middle of the decade, and by 45,000 in the most recent period. Thus, the ACS is able to track how this population changes each year – the average increase over the decade was 33,000 annually.
- Will the NYCCEC update this methodology to incorporate new data from the American Community Survey?
  - The NYCCEC will review its analysis annually to incorporate data from the most recent American Community Survey 5--year estimates.
  - The NYCCEC is charged with reviewing this methodology on or before September 1, 2022 and at least every five years thereafter.

## Additional Data Sources

- Will the NYCCEC use a “surname analysis” of voter registration records? Are these analyses evidence--based and reliable?
  - The NYCCEC will not utilize surname analysis in this methodology.
  - The utilization of surname analysis is an accepted practice to increase accuracy, approved by the Department of Justice over a decade ago. Surname analysis is used as supplementary information to voter registration data or data from the U.S. census. It is never used by itself. If the NYCCEC uses surname data in the future, it would only be as a secondary source to increase the overall reliability of poll site selections.

- Will the NYCCEC use data about the utilization of services?
  - The NYCCEC will not use utilization data for selecting poll sites for November 2020. Like surname data, utilization data is a secondary source of data to help validate the poll sites chosen. The NYCCEC will begin to review utilization data as one indicator of demonstrated need, after three general election cycles.

## Targeting Poll Sites

- How does the NYCCEC determine the number of poll sites it will serve for each language?
  - The NYCCEC uses a proportionality approach to allocate poll sites per program eligible language based on each particular language's percentage share of the total CVLEP population.<sup>3</sup>
- How does the NYCCEC determine which poll sites it will serve?
  - Interpretation services will be provided in a given program eligible language at poll sites with the highest concentration of persons that speak that particular language and are citizens of voting-age with limited English proficiency. The number of poll sites that receive services in a particular program eligible language will depend on that language's percentage share of the CVLEP population compared to other languages served by the Program.
  - The overall number of poll sites served will depend on the total amount of funds allocated to the program.

## Training and Recruitment of Interpreters

- How will the NYCCEC recruit interpreters?
  - The NYCCEC will recruit interpreters in all program eligible languages through social media channels, job-posting websites, and outreach to community-based organizations, community-based language co-ops, and additional avenues that surface out of the Language Assistance Advisory Committee (LAAC).
- How will the NYCCEC ensure interpreters are properly trained?
  - The Charter requires the NYCCEC to promulgate rules establishing minimum standards and training requirements for interpreters. All interpreters will be screened for customer service skills and receive training similar to the training the BOE provides to interpreters. This includes training on non-electioneering and ensuring voter privacy.

- Interpreters will be assessed for written and spoken fluency in English and at least one of the program eligible languages. Returning interpreters will continue to be screened on a yearly basis to maintain quality within the program.
- The interpreter training will be reviewed and vetted by members of the LAAC prior to utilization.
- Will the public be able to provide feedback on interpretation services?
  - The NYCCEC will hold annual public hearings on the training content and quality of interpretation services to allow the public to provide feedback on need and/or experience.
  - The NYCCEC convenes the LAAC quarterly, individuals interested in joining the committee may review the criteria on the NYCCEC website and submit an application.
  - The public is encouraged to submit comments and feedback through the NYCCEC's website to ensure the program is reflective of community need and experience.

## Outreach

- How will the NYCCEC conduct outreach to amplify awareness of the Poll Site Language Assistance Program?
  - The NYCCEC will share program eligible languages and correlating poll sites on the NYCCEC's website, build partnerships with CBOs and Faith--based organizations (FBO) to widen distribution of outreach materials, organize days of action leading up to Election Day, and place advertisements in community and ethnic media.

The NYCCEC will also consult the LAAC to develop an outreach strategy and timeline that focuses on building long--term relationships with CBOs and FBOs that have ties to the language communities the Program



# **Agency Language Access Plan**

**Department of Citywide Administrative Services**  
2021

# **New York City Department of Citywide Services Language Access Implementation Plan**

- I.** Agency Mission and Background
- II.** Agency Language Access Policy and Goals
- III.** LEP Population Assessment
- IV.** Provision of Language Access Services
- V.** Training
- VI.** Record Keeping and Evaluation
- VII.** Resource Analysis and Planning
- VIII.** Outreach and Public Awareness of Language Access Services
- IX.** Language Access Complaints
- X.** Agency language access accomplishments and progress on goals from previous LAIP
- XI.** The New York City Language Identification Poster and the Notice of Translation Services
- XII.** Implementation Plan Logistics

The Language Access Coordinator for the Department of Citywide Administrative Services is Latesha Parks, Director of Agency Support Services.

In a city as large and diverse as New York City communication is key to the effective delivery of services and community engagement. Local Law 30 and language access are essential to ensuring all New Yorkers, regardless of their native language, have access to the information and services the City provides.

For more information on the Language Access Implementation Plan follow this link to our website:

<https://www1.nyc.gov/site/dcas/about/language-access-plan.page>



## I. Agency mission and background

The Department of Citywide Administrative Services (DCAS) ensures that New York City agencies have the critical resources they need to provide the best possible services to the public. Though the bulk of our efforts support other agencies, DCAS offers select services directly to the public, such as civil service administration, opportunities to sell to and buy from the City, and a safe and clean environment in the many DCAS-managed buildings citywide. DCAS is deeply committed to ensuring that these public-facing services accommodate the vibrant, diverse array of New Yorkers and their needs.

This document, the DCAS Language Access Plan, addresses Local Law 30 (which supersedes Executive Order 120) and outlines how DCAS will accommodate persons with limited English proficiency (LEPs). As the City's population continues to evolve and diversify, DCAS will periodically review the plan to ensure it supports the changing needs of the city.



## II. Agency language access policy and goals

In formulating the Language Access Plan, DCAS established the following guiding principles for the plan to address the public's needs, now and in the future:

- a. Communicate with all New Yorkers.
- b. Ensure LEPs are accommodated and respected.
- c. Provide free translation and interpretation services to the public seeking core DCAS services.
- d. Inform the public of the services DCAS offers and how to access them.

Through the implementation of the plan, DCAS will bring these principles to its frontline public-facing services.

## III. LEP population assessment

- **Civil Service Administration** – civil service exams and their notifications will continue to be produced only in English, as the City requires job candidates hold a level of proficiency in the English language. DCAS will provide translated communications to inform LEPs of the English proficiency requirement.
- **Legal and Business Transactions** – DCAS will continue to conduct all legal and business transactions with public and private entities in English. These transactions include, but are not limited to, the areas of procurement, real estate services, contracted services, and municipal publications such as the City Record and the Green Book.

## IV. Provision of language access services

The Agency Language Access Coordinator, working with DCAS Senior Management and Managers of correspondence, call, and walk-in centers, will be responsible for administering the agency's implementation of the plan. The Language Access Coordinator will work with DCAS lines of service (LOS) to ensure the overall success of the plan and liaise with the Mayor's Office on Citywide language access issues and reporting.

DCAS will make the public aware of the plan with the use of signage at points of contact and language access communications on the DCAS website.

DCAS will utilize the following to deliver language access services:

- a. **Over-The-Phone (OTP) Interpretation Services** – DCAS will offer over-the-phone interpretation services through the Citywide service contract managed by the Department of Information Technology & Telecommunications. The contracted services will be provided by Accurate Communication, Inc.

## In-Person and Call-in Services

The OTP services will be available at points where DCAS encounters the public to provide language access to LEPs whenever feasible. Points of contact include the following:

Point-of-Contacts	Locations	Managing LOS within DCAS
Civil Service Application Center	2 Lafayette Street New York, NY	Citywide Human Capital
Civil Service Application Center	210 Joralemon Street, Brooklyn, N.Y.	Citywide Human Capital
Civil Service Application Center	18-35 Queens Blvd., Forest Hills, NY	Citywide Human Capital
Civil Service Application Center	135 Canal Street, Staten Island, NY	Citywide Human Capital
Civil Service Examinations Walk-in Window	1 Centre Street, 14 <sup>th</sup> Floor New York, NY	Citywide Human Capital
Civil Service Certifications Walk-In Window	1 Centre Street, 21 <sup>st</sup> Floor New York, NY	Citywide Human Capital
Office of Vendor Relations	1 Centre Street, 18 <sup>th</sup> Floor New York, NY	Office of Citywide Procurement
Security Posts in DCAS Buildings	Multiple locations citywide	Administration

- b. Document Translation Services** – DCAS will offer document translation services for each of its Lines of Services (LOS) when needed. DCAS will utilize the Human Touch Translation, LLC to provide this service.

## V. Training

DCAS will offer language access and plain language training to frontline staff that interact or correspond with the public, such as security officers and walk-in center staff. In addition, DCAS will disseminate the plan to all staff through its intranet site.

Language access training will be available to frontline staff that interact with the public. DCAS will conduct the training, based on Citywide training models developed by the Mayor's Office, which will include the following topics: overview of the plan, how to identify a client's primary language, how to access tools for interpretation/translation services (OTP), how to work with interpreters, cultural sensitivity, and how to track and report language access interactions.

Training Language access training was provided to the Director in charge of our Citywide Training and Application Centers (CTAC). Periodic refresher training and training for new frontline staff will be administered on an as-needed basis. Senior Management, walk-in center Managers, and the Agency Language Access Coordinator will identify which staff should attend the training.

## **VI. Record keeping and evaluation**

DCAS will measure the performance of the plan by tracking point-of-contact reports by OTP usage reports. The data for the following indicators will be collected and analyzed monthly:

# of completed customer request for interpretation

Over the phone through OTP services o In person through OTP services

# of documents translated

Language Summary

Languages accessed

% of translations by language

% of interpretations by language

## **VII. Resource analysis and planning**

DCAS relies on its employees to who encounter the public to offer ideas and feedback on language access. Employees in public facing areas are encouraged to provide feedback to the Language Access Coordinator. In addition, Administration periodically reviews its delivery of language access services and identify any gaps or shortfalls.

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

DCAS provides public awareness of language access services through its website. The website provides notification to public of the availability of free interpretation services and translated materials. Public facing areas, such as our training centers have signage indicating access to language services.

## **IX. Language Access complaints**

All public points of contact have liaisons who will receive, and track language access complaints received via 311. Liaisons will contact the Language Access Coordinator who will provide a response to the complaint within 14 days as per Citywide Customer Service Standard. The Coordinator will contact the appropriate staff member to investigate the complaint, respond to the constituent, and if necessary, assist with guidance regarding language access.

## X. Agency language access accomplishments and progress on goals from previous LAIP

The Department of Citywide Services has strived to make Language Access a priority since LL30's inception in 2017. We have most of the goals set from our previous plan.

Goal	Update
OTP interpretation services will be available to all frontline staff	All our frontline staff have access to interpretation services when needed
Interpretation services signage posted at all public points-of-contact	All our locations where the public is serviced (training centers) have signage indicating interpretation services are available
Report language access data in the Mayor's Management Report	We have been timely in our submissions on language access data to MOIA
Identify and translate essential documents	Essential documents are translated on a routine basis

## XI. The New York City Language Identification Poster and the Notice of Translation Services

The New York City Language Identification Poster and the Notice of Interpretation Services signage, developed by the Mayor's Office, will be used at points-of-contact to inform LEPs that interpretation services are available and to identify the language access needed. DCAS will also communicate its language access services through the DCAS website. DCAS staff that interacts with the public will receive training and printed instructions on how to use the OTP services.

### Document Translation

DCAS will identify and translate essential public documents. DCAS will target documents that provide fundamental information about services offered and how to obtain further assistance. Document translation will be performed by Human Touch Translations, LLC and will adhere to plain language principles. The documents will be available at relevant walk-in centers and posted online. Essential documents to be translated in the first quarter of calendar year **(CY) 2021 are:**

- DCAS Auto Action Frequently Asked Questions (FAQ)
- Civil Service Information Sheet
- DCAS Real Estate Services Information Sheet

- COVID-19 related information

The agency will periodically revisit the list to ensure the LEP population has adequate access to DCAS functions and services.

**Website Translation**

DCAS will post translated essential documents on its website, [www.nyc.gov/dcas](http://www.nyc.gov/dcas). There are currently no plans for full-scale website translation; however, DCAS will adopt any Citywide website translation and language access standards once they are established.

**XII. Implementation plan logistics**

DCAS will draw from several sources to implement the plan:

- Citywide Materials: DCAS will use standardized signage and materials provided by the Mayor’s Office, including the Language Identification Poster, Notice of Interpretation Services Poster, and various guidance documents.
- Citywide Services: DCAS is currently has translation and interpretation contracting services through a contract held by the CP Language Access Institute. In addition, DCAS will utilize Citywide training models when available.
- DCAS Staff: DCAS would like to draw from its talented, diverse workforce to staff the Volunteer Language Bank however, we were unable to provide certification of the languages; we are waiting for the Mayor’s Office on Immigration Affairs to provide a certification platform.

**Implementation Timeline**

DCAS will work diligently to execute the efforts set forth in this plan. The following is a summary of key milestones for plan implementation, listed by calendar-year quarter.

Q1 2021	DCAS conducts Language Access Plan analysis for internal use
Q1 2021	OTP translation services will be available to all frontline staff
Q1 2021	Translation services signage posted at all public points-of-contact
Q2 2021	Identify and translate essential documents (i.e. COVID-19 docs)
Q3 2021	Report language access data in the Mayor’s Management Report
Q4 2021	Begin cultural competency training based on Citywide model

# **NYC Department of City Planning Language Access Plan (2021)**

**Language Access Coordinator:**

**Dominick Answini, Associate Counsel**

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## **I. Introduction, Agency name and agency language access coordinator**

In order to comply with Local Law No. 30 (2017), the Department of City Planning (“DCP”) has developed a Language Access Plan (“Plan”) to detail how language access services would be provided to New Yorkers with limited English proficiency (“LEP New Yorkers”). The Plan proposes that the DCP provide meaningful access to information about New York City planning rules and policy as well as and the agency’s direct public services, including processing land use applications (including DCP-initiated proposals) and managing the land use review process of the City Planning Commission (“CPC”). This is the second such plan pursuant to the Local Law, the previous one was published in 2018. Such language access services shall include (i). identifying and translating those documents most commonly distributed to the public that contain or elicit important and necessary information regarding the provision of DCP services, (ii). providing interpretation and translation services to the public regarding the land use matters and to applicants for land use actions, (iii) helping LEP New Yorkers testify at CPC public hearings or at community meetings on the topic of land use proposals, and (iii) posting multilingual signage in certain locations regarding the availability of free interpretation services from DCP. The plan provides for this meaningful access in the DCP’s service areas according to a needs assessment that balances: (i) the number or proportion of LEP New Yorkers in the eligible service population; (ii) the frequency with which LEP New Yorkers come into contact with the DCP; (iii) the importance of the benefit, service, information, or encounter to the LEP New Yorker; and (iv) the resources available to the DCP and the costs of providing various types of language services. Pursuant to City policy, this Plan was submitted to the Mayor's Office on May 26, 2021.

The Language Access Coordinator is Dominick Answini, Associate Counsel. Information and Language Access can be found on the DCP’s website on Language Access can be found at

<https://www1.nyc.gov/site/planning/about/language-access.page>

## **II. Agency Mission and Background**

The DCP is responsible for the City's physical and socioeconomic planning. The DCP oversees land use and environmental review, the preparation of plans, policies and zoning studies to promote strategic development in communities throughout the City, and the provision of technical assistance and planning information to government agencies and public officials. The DCP reports directly to the Deputy Mayor for Economic Development, and through this office to the Mayor. The DCP's motto is "To plan for the future of New York City" and our strategic objectives are (1). Neighborhood improvement (catalyze long-term neighborhood improvement through integrated planning); (2). Housing (encourage housing production, affordability and quality); (3). Economic development (promote economic development and job growth); (4). Resiliency and Sustainability (enhance resiliency and sustainability of neighborhoods); (5). Land Use Reviews (ensure integrity, timeliness, and responsiveness in land use reviews).

The Director of the DCP is charged with advising and assisting the Mayor in matters related to the development and improvement of the City and in issues with long-term implications for the City's built environment. In addition, the Director also serves as the Chair of the CPC. The CPC has 13 members, of which six (in addition to the Chair) are appointed by the Mayor. The other six members are appointed by the five Borough Presidents and the Public Advocate. The CPC holds public meetings and hearings and considers and votes on land use and related applications. The DCP is charged with ensuring that the CPC has the resources and expertise to comprehend land use matters in the City and make informed determinations. The DCP planners and other staff make presentations to the CPC for land use matters that come before the CPC for approval and also present studies and research performed by the DCP so that the CPC has a grasp of issues affecting the City from a land-use perspective.

The DCP has roughly 300 employees who work in the five borough offices, and among various planning, technical, environmental and land use divisions. The Information Technology Division ("ITD"), Counsel's Office, Environmental Assessment Review Division, and Operations provide support to the entire agency.

### **Direct Services**

#### **A. Land Use Review**

The primary service provided by the DCP is the administration of the Uniform Land Use Review Procedure ("ULURP"). Pursuant to Section 197-c of the City Charter, land use decisions requiring discretionary action by the CPC are subject to a standardized process including public hearings and review by affected community boards, borough presidents, borough boards, the CPC, and the City Council. The DCP administers its portion of public review, including holding public hearings of the CPC and dissemination of related information to the public. When not meeting remotely (due to the COVID-19 pandemic), the CPC public hearings are generally held in the Lower-Level Concourse at 120 Broadway on alternating Wednesdays at 10:00am. Review

sessions, where the CPC is presented land use applications and other matters by DCP staff, are generally held in the same location on alternating Mondays at 1:00pm.

Other services of the DCP related to the Land Use Review process include:

- Providing opportunities to file applications for land use changes (including where the City is an applicant);
- Providing interested parties and the general public with information regarding applications entered into public review;
- Providing notice of and opportunities to testify at public hearings of the CPC or attend and listen to review session.

All three services entail DCP staff interacting with the service population, but last two are the most important, ensuring that all New Yorkers have the opportunity to learn and understand the complexities of land use matters and applications affecting land use, and ensuring that all New Yorkers have an opportunity to attend a public hearing or review session and make their voice heard.

## **B. Technical Assistance and Dissemination of Planning Information**

The DCP also provides planning and land use information to the public by providing direct assistance through the borough offices and the Zoning Help Desk (see below). Additional information is provided to the public through the DCP website and publications such as press releases and planning reports. NYC Planning Labs, a division of the DCP, also provides mapping information and planning data via various websites such as [zola.planning.nyc.gov](http://zola.planning.nyc.gov).

Technical assistance services are available in the DCP's five borough offices, as well as the Zoning Help Desk and Central Intake (The final two are located at 120 Broadway, 31st Floor. For a complete list of addresses, see *Appendix A*). The borough offices are all equipped to answer general land use questions, while the Zoning Help Desk is designed to field questions pertaining to the Zoning Resolution. Central Intake answers questions regarding the land use application process and accepts applications. In addition, inquiries can be submitted electronically, through the DCP website.

The DCP also assists the public by making informational and instructional materials available online and in print. Press communications are also utilized to further the DCP's broader educational role.

## **C. On-line information sources**

### **1. The DCP website:**

The DCP website is a comprehensive data source which contains information on city planning in general, DCP initiatives in the field of city planning, an explanation of zoning, instructions of

how to make a land use application to the DCP, as well as pages expressing the CPC's upcoming public hearing and review session agendas. Also available on the DCP website is a wealth of data on demographics, land use data, and the geography of the City. The website includes a segment on Language Access.

## 2. Zoning Applications Portal

The DCP also has created the Zoning Applications Portal ("ZAP") which allows New Yorkers to review and download land use applications currently in public review, including all related environmental review filings. ZAP ensures that the public has easy access to land use applications, drawings and project descriptions that were previously only available on paper, and through local Community Board offices. It also gives the public the opportunity to easily see all the details of an application before a public hearing. There is also a separate webpage of ZAP which serves New Yorkers who wish to make their land use applications on-line rather than via paper copies and this applicant-focused portal allows applicants to see their application's submission status and timeline of previous and next steps.

## 3. Zoning and Land Use Application (ZOLA) Website

Through the website Zoning and Land Use Application (ZOLA) one can find much information about City properties (including the zoning designation, ownership, building floor area and links to other agencies) as well as data such as street widths, locations of sidewalk cafes and the limits of special zoning districts.

## 4. Street Map Website

Through the website Street Map one can find information concerning the current NYC street map as well as a cataloging of all past modifications to the official City map and information regarding street names and pierhead and bulkhead lines

### **III. Agency Language Access Policy and Goals**

The DCP and the CPC place great importance on helping New Yorkers understand and participate in the City's planning process. The DCP's Language Access Plan seeks to further these goals by affording LEP New Yorkers improved access to DCP/CPC resources, and consistently providing improved access to opportunities to meaningfully participate in the land use review process. What follows is a summary of the DCP's overall goals for this Language Access Plan.

#### **A. Access to Technical Assistance and Other Important Planning Information**

Through frontline locations, public correspondence, and online and published materials the DCP seeks to make zoning and land use information available and intelligible to all New Yorkers, including, via the proposals described in this LAP, all LEP New Yorkers, and to provide consistent guidelines, training, and resources to DCP staff to ensure their ability to interact with LEP New Yorkers seeking assistance.

#### **B. Public Participation in the Land Use Review Process, Including Applying for Land Use Actions**

All members of the public should have the ability to participate in deliberations on land use issues affecting their neighborhoods and the City, generally. In order to effectively participate in a public hearing, the public must have access to written information regarding the applications and proposal affecting their neighborhood, advance notice of public hearings and review sessions, and the ability to give testimony to the CPC. This plan seeks to ensure that LEP New Yorkers have meaningful access to and can effectively participate in the land use review process. Given the COVID pandemic much of the space for participation has moved from community-based meetings/hearings or CPC meetings/hearings to on-line forums, and it is the DCP's goal as well as responsibility to ensure that all New Yorkers, including LEP New Yorkers, have as much of an opportunity to be heard on land use matters proposals and applications as prior to the pandemic.

All members of the public should also have the ability to make applications for land use actions so that they can use their land as they see fit within the confines of the land use law, rules and regulations of the City. It is the DCP's goal to ensure that such applications can be made more easily for LEP New Yorkers, with the caveat that nearly all land use applications are processed by service providers (e.g., attorneys, architects, environmental consultants) who are fluent in English.

The DCP has appointed Dominick Answini, who also holds the position of Associate Counsel, the Language Access Coordinator and he will be responsible for ensuring the DCP's implementation and ongoing compliance with this Plan. The DCP has also appointed him the Language Bank Liaison so that he will be responsible for the maintenance of a list of DCP employees with sufficient language skills to serve as translators for LEP New Yorkers ("Volunteer Language

Bank”). The Language Access Coordinator, working with the other agency divisions as appropriate, will work toward the continued operation and, as applicable, timely completion of each portion of this plan as outlined in *Section IX* as he has worked towards fulfilling the goals and responsibilities of the previous language access plan from 2018. As specified in *Section XII*, the Language Access Coordinator will be responsible for monitoring and overseeing the effectiveness of the DCP’s policies towards meeting the City’s needs.

On an annual basis, the Language Access Coordinator will report to the Executive Director of the DCP regarding the sufficiency and appropriateness of language services to ensure that the above goals are satisfied, as well as all of the complaints, responses, and outcomes of such responses and include this information in the annual report to the Executive Director noted in *Section III*.

#### **IV. Agency Language Access Accomplishments and Progress on Goals from previous Language Access Plan**

The DCP first drafted a Language Access Plan in 2009 in response to the Mayor's Executive Order No. 120 of July 22, 2008 and it was updated in 2018 as a response to Local Law 30 of 2017. The following explains the progress the DCP has made since 2018.

Starting in 2018, after the Language Access Plan was drafted and approved by the Mayor's Office of Immigrant Affairs, the DCP began to improve their accessibility to language access services.

##### **1. Reconstituting of the Volunteer Language Bank:**

The Volunteer Language Bank was in existence long before 2018 but the list of volunteers had not been updated for several years. A new initiative reconfirmed existing volunteers and brought in new volunteers, most of whom were planners. The number of volunteers and languages spoken were increased to the point where in early 2021 the Bank could boast of 25 volunteers speaking 11 languages. The volunteers have frequently been utilized not only as interpreters but also as translators of materials and proofers of professionally produced translations.

##### **2. Improved signage:**

There was essentially no multilingual signage at the DCP headquarters at 120 Broadway nor at the five borough offices or at the CPC hearing room in the Lower Concourse of 120 Broadway prior to 2018. The signage was immediately increased and by 2019 each location had wayfaring signage in each of the Top 10 Designated Citywide Languages, a supply of "I speak" cards available for LEP New Yorkers to express the language in which they were proficient, as well as signage expressing that translation was available in over 20 languages (via Language Line©)) and such services would be provided free of charge. In the hearing room of the CPC, cards which were to be filled out in order to testify at a hearing were also created in each of the Top 10 Designated Citywide Languages.

##### **3. Website:**

The language access information on the website was sparse in 2018. That year and into 2019 the Language Access Coordinator drafted summaries on such topic as: "When and why was zoning created?", "How is Zoning enforced?", "How is zoning amended?" As well as more practical information such as "How one can testify before the CPC?" and "How to make a land use application?". These summaries were drafted in plain English and then were translated by Geneva Worldwide, Inc ("Geneva") (and proofed by the Language Bank Volunteers) into each of the Top 10 Designated Citywide Languages. They were posted on a page of the DCP website entitled: "Language Access". This Language Access section also provided and continues to provide information regarding how one could make complaints about the provision of language

access services as well as a link to the Language Access Plan and demographic information about LEP New Yorkers. When the COVID pandemic occurred information about the suspension of the land use review procedure and its recommencement in September of 2020 was also translated by Geneva (and proofed by Language Bank Volunteers) and the links to such information were posted on the first page of the DCP website.

4. Training:

Starting in 2018 the Language Access Coordinator provided training classes for the frontline Divisions of the DCP (each borough office, Environmental Assessment and Review, the Zoning Help Desk) and has also provided training to new hires. The training consists of an explanation of Local Law 30, The Language Access Plan goals, the resources available and how they are to be provided, and record keeping. Over the course of this year (2021) the Language Access Coordinator shall determine, with the Senior Practices Manager, which staff has yet to be trained so that they can be trained before the end of the year. As the frontline employees were trained in late 2018 and new hires were trained since 2019 there are likely few that need to be trained. There is currently a training session scheduled for new hires on June 15, 2021. One for current employees who were never trained will be scheduled this summer.

5. Provision of services in the last three years:

In the last three years language access services have been provided by each of the five borough offices and our Land Use Review division.

Over 50 separate summaries that were eventually posted on the DCP website (which were summaries [described in *Section IV.1*, above]) were translated by Geneva over the last three years. DCP Volunteers also translated materials related to applications, such as proposal summaries or translations of environmental studies, 22 times in the last three years, in the languages of Spanish, Korean, Mandarin, and Cantonese, for such proposals as the Gowanus Neighborhood Study (Brooklyn), Industry City Rezoning (Brooklyn), 215 Moore Street Rezoning (Brooklyn), the Southern Boulevard Neighborhood Study (Bronx), the Flushing Waterfront Rezoning (Brooklyn), the Soho/Noho Rezoning (Manhattan) and the Southern Boulevard Rezoning (Bronx). DCP volunteers also served as interpreters 9 times for public meetings (including for the Southern Boulevard Rezoning, Metro-North Neighborhood Study (Bronx), the Soho/Noho Rezoning) and walk-ins to the borough offices in the languages of Spanish, Korean, Mandarin, Cantonese and Urdu.

The DCP has been endeavoring to accomplish the set goals from the 2018 LAP for the last three years. To summarize our progress:

Goal	Update
Updating of the Volunteer Language Bank	accomplished



Free Telephonic translation at frontline locations	accomplished
Signage for Frontline locations in Top 10 Designated Citywide Languages	accomplished
Automated translation of DCP webpages	partially accomplished
Update the Language Services Webpage on the DCP Website	accomplished
Continue to allow Non-English Language Testimony at All Public Hearings including additional time to testify for LEP New Yorkers	accomplished
Update the Emergency Response (Continuity of Operations Plan)	accomplished

## **V. LEP Population Assessment**

Language access requirements for each service area are evaluated according to a needs assessment that balances: (i) the number or proportion of LEP New Yorkers in the eligible service population; (ii) the frequency with which LEP New Yorkers come into contact with the DCP; (iii) the importance of the benefit, service, information, or encounter to the LEP New Yorkers; and (iv) the resources available to the DCP and the costs of providing various types of language services. The following assessment addresses the four-factor analysis on a service-by-service basis.

As of 2018, according to the American Community Survey One Year Estimates, approximately 48% of New Yorkers spoke a language other than English at home and approximately 22% (nearly 1.8 million) of New Yorkers spoke English “less than very well”. Surveys of DCP employees find that very few applicants and essentially no representatives of applicants speak English less than well (indicating a very low number of LEPs in the that service population). Surveys indicate that other aspects of services performed by DCP, including managing CPC hearings and giving generally advice on the topics of zoning and land use, as they are available to all New Yorkers, result in a higher number of interactions with LEPs. As all New Yorkers can avail themselves of these services (indeed, all New Yorkers should know that they have a stake in and can petition the CPC on land use matters) we consider the service population to be all New Yorkers.

### **A. Technical Assistance Areas**

#### **1. The number or proportion of LEP New Yorkers in the eligible service population**

Technical assistance (e.g., aid provided to help understand the land use process, the Zoning Resolution, and other aspects of land use law and policy) is available to all members of the New York City public, and the service population is drawn from the full City population, containing nearly 1.8 million LEP New Yorkers. DCP acknowledges that children would probably not be accessing technical assistance but they might and without counting them the number would still be over 1.0 million.

#### **2. The frequency with which LEP New Yorkers come into contact with the DCP**

In interviews with the DCP technical staff, little direct contact with LEP New Yorkers was reported. This is not surprising as many of the persons who would be using technical DCP services would hire representatives to navigate the land use process.

#### **3. The importance of the benefit, service, information, or encounter to the LEP New Yorkers:**

The DCP places great importance on helping New Yorkers understand and participate in the City’s planning process. The Language Access Plan seeks to further these goals by affording LEP

New Yorkers improved access to DCP services, including those of the dissemination of information about land use in the City and help in comprehending the aspects of land use law, procedure and policy. The rules and policy considerations that determine land use in New York City is complicated, especially to those not well-versed in the field. However, land use rules and policy can affect not only landowners in the City but anyone as all New Yorkers, by definition, live in the City and are impacted by land use law, procedure and policy. It would be a major loss for the LEP New Yorkers if technical assistance were not available to help them understand these matters.

4. The resources available to the DCP and the costs of providing various types of language services.

The DCP's current practice is to use the existing Volunteer Language Bank composed of bilingual staff to translate relatively simple materials as needed and to interpret and answer questions by LEP New Yorkers on an informal basis as well as bilingual staff who, while perhaps have not volunteered for the Bank, nevertheless, especially given their knowledge of the complexities of land use, make excellent interpreters for this service. The use of the Bank and other *ad hoc* volunteers has been very effective over the last three years (since the formalization of the Language Bank in 2018) and the perception of DCP staff who were interviewed is that the current availability of bilingual speakers, particularly in Spanish and Mandarin, is generally sufficient to meet the need.

If special circumstances arise, where, for example, a LEP New Yorker needs help interpreting an aspect of the Zoning Resolution, the DCP has the resources, provided by companies for which the DCP contracts (more on this later in the LAP) to provide interpretation services for the LEP New Yorker as well as translation of DCP forms, in the Top 10 Designated Citywide Languages as well as, on an *ad hoc* basis, other languages not included in the list of Designated Citywide Languages. DCP has access to LanguageLine and Geneva, companies which can interpret or translate beyond the Top 10 Designated Citywide Languages and while recent experience has shown that generally DCP staff is sufficient for helping LEP New Yorkers with interpretation or translation, DCP employees have been trained on the quick access and use of LanguageLine or to work in the Language Access Coordinator to have materials translated by Geneva.

**B. Land Use Review Process**

1. The number or proportion of LEP New Yorkers in the eligible service population:

Given that applications are subject to review by the general public, similar to the Technical Assistance Areas (see above), the service population participating in the review process is drawn from all persons in the City as land use decisions via the land use review process affect the neighborhoods where New Yorkers live, work and play. There can be no analysis of an individual's quality of life without this consideration. And this does not even consider the right of all New Yorkers to be heard at community board hearings/meeting and CPC hearings/meetings and the rights of New Yorkers to be provided the best quality information

regarding land use issues. Therefore, it is DCP's position that all New Yorkers must be included in the service population (while acknowledging that children would probably not be involved in the land use review process but they might and without counting them the number would still be over 1.0 million).

All New Yorkers, including LEP New Yorkers, also may bring land use actions before the CPC to use their land in some way that is not as-of-right. The language access services should also ensure that these LEP landowners can also avail themselves of the land use process for this purpose.

2. The frequency with which LEP New Yorkers come into contact with the DCP:

While interviews with staff do not indicate a historically high level of LEP participation in CPC public hearings, the likelihood of participation by LEP New Yorkers has been greatly increased when property subject to an application is located in a community district with a high percentage of LEP New Yorkers, and there is a high level of publicity or perceived impact by members of the community. Staff reports that LEP New Yorkers wishing to testify at past public hearings have generally provided their own interpreters, or submitted written testimony. If a land use matter is located in an area of the city where there are many LEP New Yorkers, DCP may require the applicant (if it is a private application) to provide translation and interpretation services for outreach meetings in the community or for CPC hearings. If the applicant is DCP or another City agency DCP would help arrange, provide or pay for the translation or interpretation services.

Regarding LEP New Yorkers bringing land use applications before the CPC, it has been the DCP's experience that all of the land use applications brought before the CPC are administered by hired representatives who can navigate the land use process in English.

3. The importance of the benefit, service, information, or encounter to the LEP New Yorkers:

The CPC places great importance on receiving input, either in oral or written testimony, from members of the public in the land use deliberations affecting their neighborhoods. Consistent with these goals, the DCP seeks to ensure that all members of the public have access to and the means with which to provide testimony at CPC public hearings, whether that participation is in-person or remotely, as has been required during the COVID-19 pandemic. If a segment of the service population, specifically LEP New Yorkers, were not able to communicate effectively with the DCP to express their opinions on land use matters, an important factor in the consideration in the decisions of the CPC would be lost, not to mention that the LEP New Yorkers would have lost their voice to influence decisions made by the DCP and CPC regarding land use in their neighborhoods and indeed for the whole of the City.

4. The resources available to the DCP and the costs of providing various types of language services:

The DCP has historically relied on community boards, City Council members, local civic groups and the press to disseminate information to non-English speaking communities regarding important applications, and in a few instances has translated materials and provided interpretation services. As noted above in Paragraph 2, often the DCP requires private developers to provide interpretation and translation services for community outreach. Based on current DCP contracts with Geneva, providing on-site interpretation services at public hearings, be they CPC hearings or community outreach meetings implemented by DCP staff (common for DCP-initiated land use proposals), is estimated to cost approximately \$100 per hour per language provided, based on the length of hearing and the language requested. Because any member of the public may choose to participate in a hearing without advance notice, it is difficult to gauge the demand for such services in advance of a hearing. For translating written testimony, the cost is approximately 20 cents a word.

Accordingly, the Service Provision Plan (see *Section VI*) provides a framework for analyzing applications on a case-by-case basis to anticipate the demand and volume of appropriate LEP services. (See *Section VI*).

If special circumstances arise, where, for example, a DCP-initiative in a neighborhood where many speakers of certain languages reside, the DCP has the resources to provide translation services for the community with regard to any DCP-presentations to the community or to receive inquiries from residents.

### **C. Agency Press Communications:**

1. The number or proportion of LEP New Yorkers in the eligible service population:

Media communication is available to all members of the public, and the service population is drawn from the full city population, containing some 1.8 million LEP New Yorkers, although DCP acknowledges that children would probably not be the target audience for DCP press communications, but they might and without counting them the number would still be over 1.0 million.

2. The frequency with which LEP New Yorkers come into contact with the DCP:

The DCP Press Office reports that non-English language media outlets regularly communicate with the Press Office in English (although non-English materials from community groups may be included in the communications), and that English language press releases do not limit access by, or dissemination to, the non-English language media. The Press Office, working with the Borough Offices, determines the demographic makeup of the area affected by the project and shapes DCP's communications to reach LEP New Yorkers in pertinent languages in the affected area.

3. The importance of the benefit, service, information, or encounter to the LEP New Yorkers:

The DCP recognizes the importance of communication with the public, especially with regard to proposals (whether DCP-initiated or initiated by another agency or a private entity) that would directly affect neighborhoods' quality of life. Consistent with this, the DCP seeks to ensure that all LEP New Yorkers have access to the information, whether from DCP-communications or from other sources of information, that would allow LEP New Yorkers to understand what is being proposed for sites in their neighborhood, in their borough or in the City generally. If LEP New Yorkers did not have access to the information that is published by the DCP, especially on matters of land use affecting their neighborhoods, a major function of the DCP, to inform and give notice of land use actions and proposals, would not be effective for a large portion of the NYC community. That community, the LEP New Yorkers, would need to find other methods of discovering information and data expressed by the DCP which would put them at a disadvantage to understanding where when and how upcoming land use actions would occur.

The resources available to the DCP and the costs of providing various types of language services.

The DCP has historically engaged local and city-wide press outlets, some of which publish in the Top 10 Designated Citywide Languages but accept information from the DCP in English, to disseminate information to communities with a high-proportion of LEP New Yorkers. The Press Office has access to DCP Volunteers for translations of press releases before they are released.

## **VI. Provision of Language Access Services**

The DCP employs policies to ensure that staff at frontline service centers consistently assists LEP New Yorkers by ensuring availability of interpreters, training of frontline staff, and adequate signage.

### **A. Interpretation Services:**

1. The basic resource for interpretation is existing DCP staff. Staff is trained (including those who only speak English) to recognize an LEP New Yorker and to use non-verbal cues (such as signage and “I speak” cards”) to determine which language is needed as well as where to get interpretation help (i.e., LanguageLine (see below) or Volunteer Language Bank) Staff at DCP is often bi- or tri- lingual and each office is staffed by planners who can help at a moment’s notice, especially in the more common languages spoken in their office catchment areas (e.g., the Bronx for the Bronx Office, etc.). However, this is only a quick fix and while it is often enough for certain technical or even land use services, it is generally inadequate for the many languages spoken by LEP New Yorkers.
2. A further way the DCP provides language access services is via the agency “Volunteer Language Bank”. The Bank is a list of volunteer staff who have generally been vetted and trained by the Language Access Coordinator to ensure that there is a supply of qualified translators and interpreters who also a very familiar with the knowledge base of the agency. Although the Volunteers are not specifically trained as translators or interpreters, they are generally able to navigate the intricacies of land use rules and policy as well as the procedure of the public review land use process better than a professional translator unfamiliar with the field. Also useful is that many of the Volunteers who have emigrated to the United States have studied planning in their countries of origin and so have that language’s vocabulary of planning at their disposal to help with interpretation and translation. The DCP does not determine whether a Volunteer is qualified to translate or interpret in a particular language nor are there instances where the Volunteer is prohibited from translating. We have not had any complaints about the provision of services provided by Volunteers in the last three years. If a DCP volunteer is inadequate, for example if the LEP New Yorker is having trouble communicating with the volunteer, DCP has alternative means or providing services (see next paragraph).
3. A secondary resource contract (“LanguageLine©”) has been established with the city’s Department of Information Technology and Telecommunications (“DoITT”) providing interpretation via telephone when the DCP staff is unavailable or there is no staff member who can translate the needed language. This contract’s resource allocation is regularly monitored and reevaluated based on demand for service. The contract provides that the DCP will be able to provide via LanguageLine interpretation in at least 100 languages, both common and esoteric. The wide scope

of LanguageLine’s list of languages can help when the Language Bank Volunteers do not know the required languages (although that rarely happens). Requests to use LanguageLine do not need to go through the Language Access Coordinator as often the need for such services are immediate.

## **B. Translation Services**

For written correspondence, and in-person translation for example, translation for spoken testimony at a public hearing, the DCP contracts with Geneva. Before staff can use Geneva the Language Access Coordinator and the Procurement Department must be consulted to determine if the use of Geneva is appropriate and also to understand and consider the cost of the services provided. An important step taking when translating materials by Geneva is quality control by DCP staff. As noted above the technical aspects of land use law, zoning and land use review procedure are complicated and DCP’s staff’s skills in the field allow them to ensure that the Geneva-translated materials explain the planning aspects correctly.

## **C. Language Access in Agency Communications**

*Section V.C.* expresses how the DCP Press Office provides agency communications. Other communications, for example, materials produced for CPC meetings as well as community meetings, are generally translated on an ad hoc basis (depending on the languages needed for the specific service population for a project<sup>1</sup>). As it is DCP’s charge to understand communities, before communications are expressed, we determine with the local DCP planner which languages are needed and translate, generally with Geneva, accordingly. The planner can look to materials produced or organized by DCP’s Population Division that can give insight as to the language demographics in certain areas.

In accordance with the Mayor’s Office, citywide policy and protocol, the DCP will continue to provide automated translation of all website material, through a third-party translation tool (e.g., “Google Translate”). However, as Google no longer supports this tool, and is available only to older sites (e.g., the main DCP website but not the new ZAP website), it may stop working at some point. Fortunately, the major browsers (such as Chrome, Safari and Edge) all have an automatic translation tool. This function significantly enhances access to reference information regarding the work of the agency, basic zoning concepts, regulations, and the public review processes. Given how much more effective the DCP has become in the last five years of providing information via web-access tools (see above) translation of the website is important. However, DCP has translated important portions of the website and located this information in a section of the website entitled “Language Access”.

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<sup>1</sup> For example, if a rezoning is to occur in an area of the city where there is a large number of Spanish and Cantonese speakers, DCP will have translated hand outs explaining the proposal and how to testify at CPC or community hearings. If it would be a private application, DCP requires the private applicant to provide, at their cost (but proofed by DCP staff) materials explaining the proposal in the required languages.



The Language Access portion of the DCP website is dedicated to non-English language material where the DCP has drafted basic summaries about the agency, including the services provided as well as a summary of zoning and land use procedure in New York City which is translated into the Top 10 Designated Citywide languages. These materials were translated by Geneva and then proofed, to the extent that our Language Bank had the resources (i.e., a volunteer who could translate the language) to ensure accuracy not only to the language fidelity of the translation but also to the accuracy of the translation from a planning standpoint. The materials can be found here on the Language Access portion of the website:

<http://www1.nyc.gov/site/planning/about/language-access.page>

In the last calendar year, the DCP has also created translations of information regarding how the land use process has been halted and later resumed remotely as a result of the COVID-19 pandemic. This information has been translated into the Top 10 Designated Citywide Languages and has been modified as needed as the pandemic has proceeded.

#### **D. Plain Language**

Materials that are created for the DCP website or for use in CPC hearings or community hearings, as well as materials created by the press office, are generally provided according to plain language principles as identified by the Mayor's Office. Before the materials are translated the English versions are reviewed by the Language Access Coordinator or the press office (if specifically for agency press communications) to determine if they are easily understandable and use a minimum of technical words and phrases. This can be difficult as often aspects of zoning and land use regulation are quite technical, but we recognize that a correct translation that is nevertheless too difficult to understand is not a good provision of services. The translated materials are then generally reviewed, to the extent that our Language Bank has the resources, to ensure that there is fidelity between the original plain language English version and the translated version.

#### **E. Policies and Procedures for Helping to be More Welcoming, Signage and Languages Beyond the Top 10 Designated Citywide Languages**

The borough offices as well as the main DCP office at 120 Broadway and the CPC hearing room has been outfitted with new directional and welcome signage in the top ten "designated citywide languages" as defined by the Mayor's Office in 2017 (which are Spanish, Chinese (including Traditional and Simplified), Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, & Polish), and DCP staff in these locations shall have Mayor's Office of Operations "I Speak" language identification cards available to inquiring LEP New Yorkers to assist in language identification. Training provided to frontline staff ensures that upon greeting visitors, staff can assist in identifying LEP New Yorkers using the Mayor's Office of Operations identification posters, and can identify the appropriate interpretation resource. DCP also at each of the offices has signage explaining that if an LEP New Yorker needs interpretation services that those services would be provided free of charge. The DCP has implemented these policies to provide

access in top ten designated citywide languages defined by the Mayor's Office in 2017. Regarding languages beyond the Top 10 Designated Citywide languages, at least over the last three years there has been very little demand for services in those languages. However, DCP has capabilities, pursuant to our contracts with Language Line and Geneva, to provide for services if need be as our resources allow. Recently (early 2021) for a public (remote) meeting on the Soho/Noho rezoning, which is a DCP-led initiative, DCP was able to hire Geneva to provide a Cantonese interpreter even though Cantonese is not one of the Top 10 languages, evidencing that when needed DCP can respond to needs beyond the most widespread non-English languages.

## **F. Land Use Review Process and the Public's Participation**

General policies as noted earlier in *Section V.B* have been implemented to improve access to application information and public hearing notices, and to facilitate the submission of non-English language testimony. Given the high cost and widely varying need for language services during the public review process, the DCP Executive Director determines, on a case-by-case basis, whether and to what extent additional measures should be taken to ensure access. Such determinations will be made in consultation with the DCP borough office director and through consideration of the following factors: (i) the percentage of LEP New Yorkers in the affected community district; (ii) whether the application will have impacts on the community generally or a limited number of properties; (iii) the interest demonstrated by LEP New Yorkers, their community groups, and the non-English language press; and (iv) the cost of supplemental services.

General policies to be implemented are described below, followed by additional measures which are recommended for instances which are deemed to warrant additional measures to ensure access.

### **1. Information Regarding Current Applications to Come Before the CPC**

Application information may be obtained from a variety of sources including: official application files, docket language from the CPC calendar (a brief expression of the proposed land use proposal), CPC Reports, oral presentations (by DCP staff or applicants and their representatives) at CPC review sessions and public hearings, community board meetings, presentations and summaries. Nearly all of these materials (including during the COVID-19 pandemic the oral presentation in real time) are available on the DCP and community boards' websites.

- For all applications, automated translation of most of the website makes application information more widely accessible, particularly for DCP-initiated applications for which a significant amount of plain language description is provided.
- For DCP initiated applications (e.g., for a rezoning of an area of the City) which warrant additional measures to ensure access by LEP New Yorkers, additional project information may be professionally translated (and proofed by Language Bank

Volunteers to the extent feasible) and made available on the DCP website or distributed at an in-person community meeting.

## 2. Notice of Public Hearings

- Automated translation of the website makes public hearing schedules able to be found by LEP New Yorkers.
- For applications deemed to warrant additional measures to ensure access by LEP New Yorkers, professionally translated notice (which has been proofed by DCP Volunteers to the extent feasible) would be posted on the website and disseminated through interested community boards.

## 3. Testimony at Public Hearings

- For all applications, the CPC accepts testimony from LEP New Yorkers in the Top 10 Designated Citywide Languages defined by the Mayor's Office. If requested the DCP can arrange to have an interpreter available and will allow for additional time to testify if simultaneous interpretation is being used. Non-English written testimony or non-simultaneous oral testimony in a language that is not English (which will be transcribed from the CPC video recording), would be translated professionally by Geneva, and provided to the CPC members for consideration to ensure that the testimony is clearly transmitted to and understood by the CPC members.
- Directional signage at public hearing venues has been posted in the Top 10 Designated Citywide Languages, and instructional information has been made available in these ten languages for LEP New Yorkers wishing to testify. Generally, all CPC public hearings, when the public hearings are not remote as during the COVID-19 pandemic, occur at 120 Broadway where the requisite directional signage has been posted.
- For applications which are anticipated to elicit testimony from a large number of LEP New Yorkers, on-site interpreters may be retained by the DCP. If the proposal is expected to elicit testimony in specific languages the DCP can provide interpreters for those languages in anticipation of their need, but for more esoteric languages the DCP will need to be informed, ideally two weeks in advance, to have interpreters available. It may not be cost-effective to have interpreters (especially from a private company) to be on call for the entire hearing but the Executive Director will make that determination on a case-by-case basis. If the application is a private application the DCP will likely require the applicant to pay for the interpretation or translation, as needed.

## 4. Land Use Applications Made by LEP New Yorkers

Interviews with Land Use Review Division staff indicate that there are essentially no applications made where the applicant or applicant's representative require translation

services. Applications brought before the CPC are generally managed by representatives who are all fluent in English. There is no plan to create land use forms in the Top 10 Designated Citywide Languages but if required by specific circumstances DCP's Executive Director can direct Geneva to translate land use application forms into the required language.

#### **G. Licenses permits and Registrations**

Although the DCP and the CPC analyze land use applications the agency does not issue licenses or permits. An approved action by the CPC is generally referred to the City Council for further review or, in the specific instance of applications which can be approved by the CPC Chair or the CPC without further City Council approved, the approvals are forwarded to the Department of Buildings who would then issue any permits based on those approvals as per the requirements of the Zoning Resolution or other New York City land use rules and regulations.

#### **H. Emergency Preparedness and Response**

While DCP is not an agency that has an immediate vital role in an emergency (such as the FDNY or NYPD) we are called on to provide geographic information for the City to aid agencies in responding to emergencies. That is not the kind of emergency response that would likely require the provision of language access services as the DCP communications to fellow agencies are always expressed in English. The DCP also is not specifically involved in the distribution of vaccinees or other materials to help combat the COVID-19 pandemic. However, the DCP must be capable of immediately expressing to our service populations when our services will be interrupted or modified in any way due to an emergency.

In the event of an emergency DCP is able to respond via its emergency preparedness and response plan (the "Continuity of Operations Plan" or "COOP"). The COOP includes a provision for the Information and Technology Division and the Human Capital Division to update the agency voicemail and website and these updates will be made in each of the Top 10 Designated Citywide languages by the either Geneva or Language Line or DCP Volunteers. The DCP also has a contract with a marketing firm that can post our multilingual messages in ethnic media sources. We would not use graphics as the information is relatively simple. In the event that the service providers cannot provide translation of messages quickly enough for posting or expression in the media then the Language Access Coordinator will call on the Volunteer Language Bank for in-house translations (which, given the simplicity of potential messages, should be more than adequate for the required task). The DCP Emergency Response Liaison (Yvonne Williams) works with the Language Access Coordinator to ensure that translations of DCP communications can be translated by the service providers as soon as is practicable. (see *Section IX*).

## **VII. Training**

Certain divisions (those who tend to work more closely with the public such as borough planners, often referred to in this Plan as “frontline”) of the DCP staff have been trained by the Language Access Coordinator in the resources available for language access and how to administer such services. New staff, as part of their orientation are similarly trained on a rolling basis (i.e., every few months when the DCP holds general orientation). Staff is generally educated on topics such as the rationale for language access, the agency’s policies procedures and resources as well as identifying and providing language access services for LEP New Yorkers. The DCP may in the future modify its methods and procedures of training DCP staff. The COVID-19 pandemic has caused a slowdown of training of front-line workers although 11 new hires were trained in the early spring.

## **VIII. Record Keeping and Evaluation**

### **A. Record Keeping**

#### **1. Frontline Interpretation**

For all interpretation services by DCP volunteers, staff has been told to log the encounter via email to the Language Access Coordinator. The log will include the date, time, duration and nature of the encounter, the language used, and any other relevant comments. All divisions in the DCP who employ language access services will be asked on an annual basis if there had been any issues or complaints with the provision of services. In this way the Language Access Coordinator can monitor the efficacy of the plan and whether such services are performing their assigned job adequately. The DCP will especially examine language access in light of DCP initiated proposals, where the onus is more on the City versus a private applicant to ensure that the public, including LEP New Yorkers, understand the land use proposal and the issues involved with such proposal.

For all interpretation provided using LanguageLine or Geneva interpreters, the DCP relies on reports from the DCP Procurement division to monitor usage.

On an annual basis, or if a significant increase in usage is noted, the Language Access Coordinator will consult with Procurement Division and the Budgeting Office to reevaluate allocated resources.

#### **2. Online Documents**

On an annual basis, ITD will report the number of page views in the LEP portion of the DCP website and which languages are accessed.

#### **3. LEP Testimony**

The Land Use Review Division will track LEP testimony and report annually to the Language Access Coordinator. In addition, DCP borough staff will be advised to monitor and convey any possible LEP interest in DCP-projects to the Land Use Review Division in anticipation of CPC Public Hearings.

#### **4. Overall Assessment**

On an annual basis, the Language Access Coordinator evaluates the above data, reach out to frontline and Land Use Review Division staff for feedback, and report to the Executive Director regarding the sufficiency and appropriateness of language services in light of the requirements of Local Law 30. Every three years this Plan and the Language Services will be updated as need be based on changes to the agency's service population or services.

## **IX. Resource Analysis and Planning**

As explained in *Section VI*, the DCP has many available resources with which the agency is able to fulfil its goals and policies regarding language access. In the current DCP budget for the fiscal year 2021 (as well as for 2022) allocates \$38,628 each year to language access. It is anticipated that the amount spent on language access will not increase as a percentage of the DCP budget and in an absolute sense the amount spent on language access services will probably be influenced by the City's budget allotment for DCP and CPC.

### **A. Language Bank**

Given the education and varied backgrounds of DCP staff the DCP has been able to compose a Volunteer Language Bank to assist in translation services. A form for self-identification allows volunteers to assess their expertise and comfort level in participating in each of the following LEP services:

- in-person/telephonically interpretation for frontline service operators;
- providing translation and quality assurance for professional translation of technical assistance public documents and public hearing notifications and other material antecedent to public hearings;
- providing on-site (or, for as long as public hearing continue to the remote as result of the COVID-19 pandemic) interpretation at public hearings and/or providing interpretation of testimony at public hearings.

Requests are made to the volunteers on an as-needed basis, with copies of the request sent to the Language Bank Coordinator for record keeping. In calendar 2020 language bank volunteer were used frequently to proof materials added to the website for disclosure about the DCP's response to the COVID-19 pandemic, but otherwise the Bank was used an estimated 6 times for translation and interpretation services.

### **B. Telephonic and Document Translation**

The DCP's contract with LanguageLine will continue to be used generally by the frontline desks (each borough office's main line, Zoning Help Desk, Central Intake), and accessible to all DCP employees with public contact positions. Staff has been and will be instructed to use LanguageLine services only in cases where DCP language volunteers are not readily available.

The DCP will also maintain preliminary translation services through LanguageLine for essential documents and non-English language correspondence.

### **C. Signage for Frontline Locations**

Signage approved by the Mayor's Office will be implemented where it is not already implemented for all frontline locations to ensure that service locations are accessible, and that

LEP New Yorkers and frontline staff are able to identify the need for language services and that such services can be provided free of charge. As noted in *Section VI* the signage will include directional signage at public hearing venues in the Top 10 Designated Citywide Languages including instructional information in these ten languages to help LEP New Yorkers who wish to testify at CPC public hearings.

#### **D. Automated Translation of DCP and CPC Websites**

The DCP website currently employs Google Translate to translate nearly all text on each page of the website. As standards are made available by Mayor's Office and DoITT, DCP's ITD has and will continue to implement standards for automated translation of web materials.

#### **E. Language Services Webpage on the DCP Website**

As noted previously, the DCP Language Access Coordinator drafted, revised and submitted for professional translation in the Top 10 Designated Citywide Languages materials that explain:

1. Basic information about land use review process
2. Basic Information about Zoning
3. Instructions on how to give non-English language testimony (following implementation of Supplemental LEP Services, as described below)
4. Fact Sheet of available Language Services
5. An explanation of the agency's response to the COVID-19 pandemic and how the pandemic has affected and continues to affect the land use review process and how COVID-19 has changed how the public can testify at public hearings.

Prior to posting, Language Bank volunteers provided quality review of documents translated into the Top 10 Designated Citywide Languages to the extent of their capacity to do so to improve the readability and comprehensibility of the materials. The Language Access Coordinator also ensured, via his careful review, that the underlying English version which the translations were based upon meets the principles of plain language.

The number of page views in this section has been and will continue to be tracked and used to determine whether the cost of translation of additional materials is warranted.

#### **F. Non-English Language Testimony at All Public Hearings**

For all public hearings, including those remote hearings during the COVID pandemic, testimony from LEP New Yorkers in languages that are not English currently is and will continue to be accepted by the CPC, and additional time will be allowed for the simultaneous interpretations of such testimony before the CPC.

When testifying at a public hearing at 120 Broadway, or expressing that they want to heard at a remote hearing, speakers will continue to be asked to indicate whether they are a LEP New



Yorker requesting assistance providing testimony in a non-English language. If so, the DCP will use its Language Bank to attempt to identify an available interpreter. If none are readily available, testimony will be recorded, and then transcribed and translated by Geneva for distribution to the CPC. Because transcription and translation is relatively expensive, the DCP will continue to include a proviso on its website encouraging LEP New Yorkers to provide “advance notice of a request for interpretation services at an upcoming hearing”, so that appropriate interpretive services can be identified but if simultaneous translation of testimony is requested and a Language Bank Volunteer is not available the DCP has a contract with Geneva for the live translation of this testimony if needed.

#### **G. Supplemental LEP Services**

For applications where additional measures are deemed necessary by the Executive Director to ensure access (see *Section VI.D*), the following actions may be taken:

1. For certain applications/projects, based on a needs assessment, basic plain language information regarding the application/project may be posted on the DCP website, with professional translation provided in languages most appropriate for the affected community district(s), as determined by the Executive Director (See *Section VI*). Language Bank Volunteers, if available in the necessary languages, will be asked to provide quality assurance of documents prior to posting. If such application/project is a private application the DCP will require the applicant to provide such translated materials with DCP employing the Language Bank Volunteers to proof the resulting translation prior to distribution.
2. To supplement the legally required notice of hearings, notice will be translated into those languages deemed appropriate, posted on the website, and circulated to affected community boards
3. Where significant numbers of LEP New Yorkers are expected to provide testimony, the DCP may seek to provide interpretation by utilizing the Language Bank, Community Boards, or retaining professional interpreters (such as Geneva). On occasion, volunteer civic groups may continue to provide interpretation services.

## **X. Outreach and Public Awareness of Language Access Services**

The DCP, mostly through borough staff, will continue to reach out through local community boards to promote the existence of the available Language Access Resources. This outreach had been done when the previous plan was implemented three years ago but recently the COVID-19 pandemic has made this more difficult as DCP borough liaisons no longer attend in-person community board hearings where they may speak to inform the boards of such services. The plan is to try other methods of outreach so that the public knows of what services are available and for the borough liaisons to reengage with the community board even if it is remotely.

This Plan shall be updated on the DCP website in its own section of the DCP website (Language Access) and access to that portion of the website is easily found. The information provided on the website regarding the DCP's response to the COVID-19 pandemic has been translated into the Top 10 Designated Citywide Languages and is available at the top of the opening page of the website.

## **XI. Language Access Complaints**

The Language Access Coordinator is able to receive complaints and respond to them and members of the public can contact him at the address noted on page [ ] (*Appendix A*). His email and phone number are prominently displayed at the bottom of the Language Access Page of the DCP website with this statement:

If you have any questions or would like to deliver a complaint at any time, please contact DCP's Language Access Coordinator Dominick Answini, Assistant Counsel, at (212) 720-3676, [danswin@planning.nyc.gov](mailto:danswin@planning.nyc.gov) or dial 311.

Additionally, any complaints with regards to language access or the Language Access Plan that are received via the 311 system (including TTY 212-504-4115, 311ONLINE, or 311MOBILE) that would normally be forwarded to the DCP Executive Office in the normal course of business will be forwarded by DoITT to the Language Access Coordinator. Finally, any language access complaints that are received by DCP-front line staff (such as borough planners or Land Use Review Division planners) will be forwarded directly to the Language Access Coordinator.

The Language Access Coordinator shall respond to all complaints within 14 days of the DCP receiving the complaint and copy the Executive Office and the frontline planner (if applicable) on the response to the complaint.

## **XII. Implementation Plan Logistics**

The Language Access Plan has been implemented and coordinated over the last three years by Language Access Coordinator, Dominick Answini of the DCP's Counsel's Office. The Plan shall be updated every three years and posted on the DCP website on the Language Services Webpage.

### **A. Improving the Language Bank**

The DCP Language Bank Liaison updated the DCP's volunteer Language Bank in late 2018 and since then has endeavored to increase the number of volunteers, languages spoken, and the scope of their responsibilities. Currently the Bank has 25 volunteers who can speak a total of 11, languages and 5 of the Top 10 Designated Citywide Languages.

On an annual basis, the Language Bank Liaison has engaged in recruiting new volunteers and update the bank as necessary. Generally yearly, in September, The LBL sends an email to the entire agency asking for volunteers. Currently there are some of the Top 10 Citywide Languages which are not covered by the Language Bank. It is our goal to have at least one volunteer for each of the 10 languages.

### **B. Telephonic Translation**

The DCP Language Access Coordinator will maintain the contract for telephonic interpretation that has been in existence since 2009. A way to improve this, and something that we would like to satisfy this year, is to obtain dual headsets so that Language Line could be used more efficiently.

### **C. Signage for Frontline Locations**

Signage has been posted at the CPC hearing room at 120 Broadway as well as at each of the five borough offices of the DCP in the Top 10 Designated Citywide Languages instructing the public that a translation services are available. Prior to September 2021 we will reexamine the signage, especially in anticipation of the reopening of the offices and the hearing room at 120 Broadway.

### **D. Automated Translation of DCP/CPC Website**

The website is currently translated automatically and will continue to be translated for the foreseeable future via the browsers. It is a goal, although not something that DCP can solve on its own, for the City to purchase a widget for the translation of City website after the Google Translate widget is terminated (see *Section V.C.*). If the widget issue is something that DCP can solve within its power then it will.

### **E. Language Services Webpage on the DCP Website**

This page of the DCP website was extensively updated 2018 with materials that summarize in great detail many aspects of what the DCP does including a history of zoning and the DCP, how to make an application, how to testify before the CPC and the basics of NYC planning. This portion of the website will continue to be updated as needed (especially in light of the COVID-19 pandemic) by the Language Access Coordinator in consideration of the importance of the information and the cost of professional translation of the materials. The Language Coordinator, by September 2021, will review the DCP website and determine if there are other aspects of the website that should be translated into the Top 10 Designated Citywide Languages, and if so, whether the cost of translation will be justified by the additional benefit.

**F. Non-English Language Testimony at All Public Hearings**

For all public hearings, LEP testimony currently is and will continue to be accepted by the CPC, and additional time will be allowed for such testimony in order to accommodate the interpretation. The Language Access Coordinator and the DCP's Land Use Review Division staff will coordinate the provision of these services.

**Appendix:      Locations of Department of City Planning Service Centers**

**LANGUAGE ACCESS COORDINATOR**

Dominick Answini, Associate Counsel  
120 Broadway, 31st Floor  
New York, NY 10007  
(212) 720- 3676  
danswin@planning.nyc.gov

**CENTRAL INTAKE**

120 Broadway, 30th Floor  
New York, NY 10271  
(212) 720-3382

**ZONING HELP DESK**

120 Broadway, 31st Floor  
New York, NY 10007  
(212) 720- 3291

**BRONX BOROUGH OFFICE**

1775 Grand Concourse, Suite 503  
Bronx, NY 10453  
718-220-8500

**BROOKLYN BOROUGH OFFICE**

16 Court Street, 7th Fl.,  
Room 705  
Brooklyn, NY 11241  
718-643-7550

**MANHATTAN BOROUGH OFFICE**

120 Broadway  
31st Floor  
New York, NY 10271  
212-720-3276

**QUEENS BOROUGH OFFICE**

120-55 Queens Blvd., Room 201  
Kew Gardens, NY 11424  
718-286-3170

**STATEN ISLAND BOROUGH OFFICE**

130 Stuyvesant Place, 6th Fl.  
Staten Island, NY 10301-2511  
718-556-7240

**Name and title of Language Access Coordinator:**

Jade Acosta, Communications Assistant

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

NYC Department of Consumer and Worker Protection

Language access coordinator:

Jade Acosta, Communications Assistant

<https://www1.nyc.gov/site/dca/about/dca-language-access-plan.page>

**II. Agency mission and background**

The Department of Consumer and Worker Protection (DCWP) protects and enhances the daily economic lives of New Yorkers to help create thriving communities. DCWP licenses and regulates more than 75,000 businesses in more than 50 industries. The Agency strives to create a culture of compliance in the marketplace by performing onsite inspections of businesses and enforcing license regulations, weights and measures regulations and the NYC Consumer Protection Law. DCWP also provides mediation and restitution for consumer complaints. Through the Office of Labor Policy & Standards (OLPS), the Agency enforces various workplace laws, including Paid Safe and Sick Leave, Fair Workweek, and protections for independent contractors under the Freelance Isn't Free Act by investigating complaints, conducting proactive investigations and recovering restitution for workers. DCWP's Office of Financial Empowerment (OFE) focuses on initiatives that educate, empower and protect residents and neighborhoods with low incomes so they can improve their financial health and build assets by providing free financial counseling and coaching at NYC Financial Empowerment Centers, increasing access to safe and affordable financial products and services and encouraging the use of NYC Free Tax Prep, which helps eligible New Yorkers file their taxes for free and claim valuable tax credits.

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

DCWP believes that limited English proficiency (LEP) should not be a hindrance to accessing the services and information the Agency provides. Without language access services, consumers would not be able to file complaints or know their consumer rights; business owners would not be able to navigate the DCWP rules and regulations that govern commerce and the workplace in New York City, nor would they be able to apply for a DCWP license; and workers would not be able to make inquiries and file complaints. DCWP's language access implementation plan is intended to help staff provide excellent customer service to ensure meaningful access for LEP New Yorkers. To ensure meaningful access for LEP New Yorkers, DCWP:

1. Translates those documents most commonly distributed to the public into the 10 designated citywide languages (**English, Arabic, Bengali, French, Haitian Creole, Italian, Korean, Polish, Russian, Simplified Chinese, Spanish, Traditional Chinese, and Urdu.**);

2. Provides free interpretation services, including telephonic interpretation, in up to 170 languages; and
3. Utilizes multilingual signage and collateral to inform New Yorkers of the availability of such free interpretation services.

DCWP's language access implementation plan describes how DCWP intends to provide such language access services. DCWP has a language access coordinator who will facilitate the implementation of the language access plan agency wide and serve as a resource to the Agency on all language access issues.

#### **IV. Agency language access accomplishments and progress on goals from previous LAIP**

Since LL30's inception (July 1, 2017), DCWP has accomplished the following:

- Designated an official Language Access Coordinator for the Agency.
- Created an internal language bank of multilingual agency staff.
- Posted language access posters and desktop signage in customer service areas.
- Created a translated handout for use by inspectors in the field to inform businesses of the availability of language line if they prefer their inspection in a language other than English.
- Renewed contract with Language Line to provide over-the-phone interpretation in up to 170 languages and document interpretation.
- Renewed contract with Accurate Communications to provide in-person interpretation in up to 250 languages.
- Contracted with Accurate Communications to provide in-person American Sign Language interpretation.
- Translated new educational materials targeted to consumers, workers, and businesses.
- Identified and translated the most commonly distributed documents for 2019.
- Provided over the phone interpretation via Language Line 3,228 times in CY2019.
- Provided over the phone interpretation via Language Line 2,749 in CY2020.
- Provided in-person interpretation in a language other than English at 149 outreach events in 2019 to ensure all New Yorkers are educated on their rights and available City resources.
- In 2020, 124 outreach events were conducted in a language other than English.
- Integrated information about DCWP's language access services into general education and outreach efforts.
- Created a [COVID-19 online hub](#) with resources and information that are constantly updated and professionally translated in the 10 citywide languages, as well as a [Spanish](#) version of the hub. It includes information about business reopening, workplace rights, licensing updates, financial resources like tax prep, financial counseling, stimulus payments, and students loans, and funeral home consumer tips. DCWP shares new publications and translations with MOIA and other partners to help disseminate information to the public, as well as through DCWP's social channels. DCWP's outreach team also shares this information during outreach events, such as presentations,



business visits, and webinars, which have been conducted in multiple languages including Spanish, Nepali, Chinese, Bengali, Urdu, Arabic, Korean, and more.

- Created a “Cease Debt Collection” Communication Letter: Instructions and Template in 12 different languages to help New Yorkers who are facing financial hardship due to COVID-19 to request that debt collection agencies stop contacting them temporarily about debt.
- Launched numerous multilingual public awareness campaigns to ensure that DCWP reaches and educates as many New Yorkers on City programs, resources, and laws. DCWP’s annual tax campaign is translated into 12 languages.
- Promulgated new rules to protect LEP consumers from deceptive debt collection practices. As part of the rules, DCWP created a Glossary of Common Debt Collection Terms in 12 languages to help consumers better understand the debt collection process. DCWP released a report titled Lost in Translation: Findings from Examination of Language Access by Debt Collectors, which highlights the lack of language access services for LEP consumers by debt collection agencies.

2020 Goal	Update
Identify and translate the top 5 most commonly distributed documents for 2019.	Completed.
Identify and translate the top 5 most commonly distributed licenses for 2019.	The licenses have been identified and we are working on meeting the translation requirement.
Provide annual language access refresher training to all staff, which is tracked by Human Capital.	The Human Capital team will include a refresher on LL30 in the annual Mandatory Customer Service Training.
Update internal language bank of multilingual agency staff.	In progress.

## V. LEP population assessment

The following LEP population assessment is based on the Four-Factor Analysis issued by the U.S. Department of Justice. The factors are as follows:

1. The number or proportion of LEP persons in the eligible service population;
2. The frequency with which LEP individuals come into contact with the Agency;

3. Explanation of the nature and importance of the program/services for the LEP person requiring language assistance;
4. The resources available to the Agency and the cost of providing language services.

Factor 1: Number or proportion of LEP persons in the eligible Service population

DCWP's eligible service population is all New York City residents. According to the Department of City Planning's analysis of the 2018 American Community Survey, there are approximately 8.4 million New York City residents<sup>1</sup>. Approximately 48 percent of New Yorkers over the age of 5 spoke a language other than English at home<sup>2</sup>. Of that cohort approximately 22 percent reported speaking English "less than well<sup>3</sup>."

Factor 2: Frequency with which LEP Individuals come into contact with the agency

In CY2019, DCWP provided over the phone interpretation via Language Line 3,228 times. Spanish comprised 57.6 percent of telephonic interpretation sessions followed by Mandarin (22.2 percent), Cantonese (4.2 percent), Arabic (3.9 percent), Bengali (3.6 percent), Korean (3.1 percent), Russian (2.9 percent), French (0.5 percent), Haitian Creole (0.3 percent), and Hindi (0.2 percent). DCWP's enforcement team accounted for nearly 25 percent of the Language Line requests, followed by Adjudication (6.1 percent), Collections (1.2 percent), Legal (0.6 percent), and Communications (0.3 percent).

Applicants for premises-based business licenses have the option to indicate a language preference for inspections on their application. In CY2019, 10 percent of all applicants indicated a preference. Top choices are Spanish (36.04 percent), Mandarin (27.25 percent), Korean (15.07 percent), Cantonese (7.67 percent), Arabic (3.4 percent), Russian (2.97 percent), and Bengali (1.9 percent).

Factor 3: Nature and Importance of the program/services for the LEP person

DCWP enforces key consumer protection, workplace, and business licensing laws. It is DCWP's goal to provide meaningful access to its services and information to LEP New Yorkers. Without the availability of language access services, LEP New Yorkers could feel discouraged about filing complaints and seeking restorative justice or be unaware of how to identify and report unlawful conduct; LEP business owners could be unaware of the laws that apply to their business and of how to run a compliant establishment. For example, DCWP coordinates numerous Business Education Days in commercial corridors throughout the year to visit businesses and distribute educational resources in businesses' preferred language so that they are aware of the laws that apply to their business and can avoid violations during inspections.

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<sup>1</sup> <https://www1.nyc.gov/site/planning/planning-level/nyc-population/nyc-population.page>

<sup>2</sup> [https://www1.nyc.gov/assets/planning/download/pdf/planning-level/nyc-population/acs/soc\\_2018acs1yr\\_nyc.pdf](https://www1.nyc.gov/assets/planning/download/pdf/planning-level/nyc-population/acs/soc_2018acs1yr_nyc.pdf)

<sup>3</sup> Id.

Factor 4: Resources available to the agency and the cost of providing language access services

DCWP had the following contracts in place to provide language access services in FY2020:

Contracted Vendors

- Language Line (telephonic and document translation): \$57,538.16

Vendors for Micropurchases as needed

- Accurate Communication (in-person translation and American Sign Language): \$1,839.24

DCWP also employs staff who speak multiple languages and engage directly with LEP New Yorkers at outreach events and distribute translated resources.

**VI. Provision of language access services**

A. Translation

Local Law 30 of 2017 (LL30) requires that DCWP identify and translate the documents most commonly distributed (MCD) to the public into the designated citywide languages (DCL). Beginning on July 1, 2020, LL30 requires that DCWP also translate those documents MCD for the purposes of issuing a license, permit, or registration (LPR), and make the process of applying for LPRs accessible.

Notwithstanding the requirements of LL30, DCWP translates additional resources as needed.

1. Criteria for Identifying Most Commonly Distributed Documents

DCWP creates resources to help educate, empower, and protect New Yorkers, such as tips for consumers, information on workplace laws, guidelines for businesses, and more. Each year, the language access coordinator (LAC) will identify the MCD documents by first compiling a list of documents that were distributed to the public by the outreach team in the previous year, and then calculating the total number of downloads from DCWP's website and the total quantities distributed for each document. The top five documents, in terms of combined total number of downloads and quantities distributed, will be considered the MCD documents and translated into the DCL. Documents designated by the LAC as MCD will continue to be made available in the DCL on DCWP's website, until they reach the end of their "shelf life." For CY2019, the top five MCD documents were:

1. NYC Free Tax Prep Brochure
2. Workers' Bill of Rights
3. Consumer Bill of Rights Regarding Tax Preparers
4. Bail Bond Consumer Bill of Rights

## 5. Financial Empowerment Center Brochure

DCWP licenses more than 50 industries. All applicants for a DCWP license must submit a basic license application (BLA), but that is where the uniformity in the licensing process ends. Because each industry has unique licensing requirements, some categories may require an applicant to pass an examination before a license can be issued, while others may require an applicant to submit several supplemental forms in addition to the BLA.

Each year, the LAC will identify the five DCWP license categories with the highest volume of licenses issued and designate these five categories as the MCD licenses. Affixed to each DCWP new and renewal license application is an application guide. Therefore, the MCD documents for purposes of issuing a DCWP license are the applications guides. The LAC will ensure that the application guides for the MCD licenses are translated into the DCL and made available on DCWP's website. The application guides provide new and renewal applicants with step-by-step instructions on how to complete the license application. The application guides will also inform applicants that free interpretation services are available upon request. As of May 6, 2020, DCWP's top five license categories are:

1. Home Improvement Contractor (14,033)
2. Tobacco Retail Dealer (6,032)
3. Secondhand Dealer – General (4,214)
4. Sightseeing Guide (3,789)
5. Laundries (3,738)

These five categories represent 40 percent of all licenses issued by DCWP. In CY2019, 90 percent of applicants that indicated a preference for business inspections to be conducted in a language other than English applied for one of these licenses. These guides serve as a tool for New Yorkers who prefer to complete the application on their own and not contact the agency.

All document translations are completed by a professional translation vendor. All public-facing materials are reviewed by DCWP's Communications & Marketing division for plain language before submitting files for translation.

### 2. Website Translation

DCWP's website, [nyc.gov/DCWP](http://nyc.gov/DCWP), is supported by NYC.gov and features Google Translate functionality for web page content. DCWP coordinates translation and posting of PDFs in languages other than English. DCWP promotes these materials on the homepage when applicable and on social media. DCWP also has partnerships with community organizations to ensure they have access to translated materials to share with their stakeholders.

#### B. Interpretation

Over-the-phone interpretation in up to 170 languages is available at DCWP locations where staff serves the public, including 42 Broadway in Manhattan, Testing Station in Brooklyn, and NYC Small Business Support Center in Queens. Special dual handset telephones are available so staff and customers can communicate with an interpreter. Over-the-phone interpretation in up to 170 languages is also available at NYC Financial Empowerment Centers, which OFE runs in partnership with contractors. Field Inspectors carry a handout promoting free interpretation (see appendix) that allow businesses to point to their preferred language and have the inspector call an interpreter for the inspection. DCWP's outreach team uses Language Line telephonic interpretation to provide language assistance if an individual has difficulty understanding the staff member on the phone. If staff does not recognize the language in the field, they work with a customer service representative at Language Line to identify the language that is needed. To make sure the interpretation is successful and more intuitive the team briefs the telephonic interpreter on goals they want to accomplish and provide special instruction if necessary. The outreach team also has staff that speaks several other languages and assists with communicating with LEP speakers whenever possible.

When a customer indicates the need for an interpreter, DCWP staff will immediately determine the person's native language and offer Language Line as an interpretation service. While the precise method for assisting an LEP customer may vary by Division, all follow the protocol outlined below.

1. **Determine which language is required.** Language desktop signage and wall posters are posted in high traffic areas to assist staff and customers. Additionally, DCWP makes language identification cards available to frontline staff.

If staff encounters difficulties identifying customers' primary language, they will engage Language Line who should be able to assist.

2. **Use Language Line as the primary tool for providing interpretation services.** Staff is given a Quick Reference Guide with Client ID Number, Access Codes, and basic instructions. A copy of the Quick Reference Guide is also posted on the agency's intranet.
3. **At the direction of a division director or direct supervisor, staff may ask a colleague within their division, who is listed in the internal language bank of multilingual agency staff, to assist with on-site interpretation on a voluntary basis; however, staff should engage Language Line first before asking a staff member to interpret.**
4. **If a customer brings an interpreter, make sure the customer knows that free interpretation services are available.** Never allow minors to serve as interpreters.
5. **Staff are encouraged to bring any language issues that arise to the attention of their Division Director and the LAC.**

### *C. Notification of free interpretation signage*

Wall posters and desktop signage (please see appendix) promoting free interpretation assistance are in high traffic areas where DCWP serves the public, including:

- DCWP Licensing Center at 42 Broadway, Lobby
- Collections and Settlement Unit Divisions, 42 Broadway, 5th floor
- Consumer Services, OLPS, Legal Divisions, 42 Broadway, 9th floor
- NYC Small Business Support Center in Jamaica, Queens

Field Inspectors carry a handout promoting free interpretation (please see appendix).

### *D. Emergency activation*

Senior Leadership assesses the situation, determines what information needs to be relayed to the public, and assigns Communications & Marketing staff to draft communications.

Communications & Marketing determines the best ways to convey information to the public, which would include 311, the DCWP website [nyc.gov/DCWP](http://nyc.gov/DCWP), and social media channels.

- NYC.gov features web page translation functionality.
- 311 can provide assistance in up to 170 languages via Language Line.

## **VII. Training**

- A copy of the new language access implementation plan and the quick reference guide is available to all DCWP staff via the agency's intranet.
- The LAC will review the language access implementation plan with Division Directors.
- During new hire orientation, the Training and Employee Relations Specialist will provide an initial introduction to language access resources prepared by the LAC.
- An annual email from the LAC reminding staff of the importance of Language Access, where to find the language access plan, quick reference guide, dual-use headsets, and who the LAC is.
- Subsequent training will be provided by Division Directors for job-specific responsibilities and will also provide refreshers periodically.

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

DCWP will maintain records of interactions with LEP customers.

- Requests for interpretation are noted on Language Line reports (invoices), including Call Detail (language, time, date, duration) and Call Detail Summary Report.
- Requests for professional document translation and in-person interpretation are in the Financial Information Tracking System (FITS), including estimate and final invoice.
- The LAC will review and evaluate language access data and information annually, including a review of qualitative feedback from Division Directors. Assessment of this information will include general monitoring of the language access plan for LL 30 compliance; review of any complaints received; and, when necessary, recommendations to update the implementation plan to address emerging issues.

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

- DCWP's Human Capital Division will continue to explore expanding job titles to include multilingual capacity in the preferred job skills category. Bilingual staff members' language skills are usually assessed through field testing and peer review by trusted reviewers.
- DCWP's Human Capital Division will collaborate with Division Directors seeking to hire staff at DCWP to make certain that potential candidates are notified of DCWP's and the City's commitment to multilingual capacity for public-facing positions.
- Based on feedback from the LAC, DCWP's Finance Division will work to maintain, expand, and renew contracts for over-the-phone interpretation, document translation, and on-site/in-person interpretation, as necessary. DCWP regularly evaluates its translation budget based on need and demand to ensure we can provide as much language access as possible.
- DCWP will conduct outreach and public awareness of language access services.
- DCWP will advertise the availability of language access services on its website [nyc.gov/DCWP](http://nyc.gov/DCWP), via social media, in press releases and public materials. Staff who conduct community outreach will include general information about the availability of language access services at the Department.
- DCWP public awareness campaigns and major initiatives are, and will continue to be, translated into multiple languages.
- DCWP will continue to ask stakeholders and partners if translation or interpretation is needed to serve target populations. If DCWP is hosting an event and interpretation is needed, DCWP will either make multilingual staff available to deliver the presentation or procure professional interpretation services. If DCWP is invited to co-host an event with an organization, DCWP will either make multilingual staff available to deliver the presentation or procure professional interpretation services if the host organization is unable to provide interpretation.
- DCWP will continue to distribute translated materials to support outreach efforts to target populations.

## **X. Language Access complaints**

- DCWP’s LAC will receive, track, and respond to complaints about language access via 311 and social media.
- The LAC will review complaints and update the implementation plan to address emerging issues, as necessary.

## XI. Implementation plan logistics

	<b>Goal #1: : Ensure agency documents are translated and in compliance with LL30</b>	<b>Responsible Staff</b>	<b>Deadline</b>
Milestone 1	<ul style="list-style-type: none"> <li>• Identify the top five most commonly distributed licenses. DCWP will translate the application and renewal packets for these five categories. Example application packet: <a href="https://www1.nyc.gov/assets/dca/downloads/pdf/businesses/LicensingChecklist-TobaccoRetailDealer-English.pdf">https://www1.nyc.gov/assets/dca/downloads/pdf/businesses/LicensingChecklist-TobaccoRetailDealer-English.pdf</a></li> <li>• Identify the top five most commonly distributed documents.</li> </ul>	<ul style="list-style-type: none"> <li>• Language Access Coordinator</li> <li>• Communications &amp; Marketing</li> <li>• General Counsel</li> <li>• Licensing</li> </ul>	June 30, 2021
Milestone 2	<ul style="list-style-type: none"> <li>• Conduct a plain language review of materials to be translated</li> </ul>	<ul style="list-style-type: none"> <li>• Language Access Coordinator</li> <li>• Communications &amp; Marketing</li> <li>• General Counsel</li> <li>• Licensing</li> </ul>	July 30, 2021
Milestone 3	<ul style="list-style-type: none"> <li>• Submit materials to translation vendor</li> </ul>	<ul style="list-style-type: none"> <li>• Language Access Coordinator</li> <li>• Communications &amp; Marketing</li> <li>• Administration (Finance)</li> </ul>	July 30, 2021
Milestone 4	<ul style="list-style-type: none"> <li>• Review translated materials, where applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Language Access Coordinator</li> <li>• Communications &amp; Marketing</li> </ul>	August 31, 2021
Milestone 5	<ul style="list-style-type: none"> <li>• Make materials available to the public.</li> </ul>	<ul style="list-style-type: none"> <li>• Language Access Coordinator</li> <li>• Communications &amp; Marketing</li> <li>• External Affairs</li> <li>• Licensing</li> </ul>	August 31, 2021
	<b>Goal #2: Audit and update/create any new supporting materials (in English) that will be required to make LPRs accessible (this may include instructions or information about getting help with interpretation)</b>	<b>Responsible Staff</b>	<b>Deadline</b>
Milestone 1	<ul style="list-style-type: none"> <li>• Post language desktop signage and wall posters promoting free interpretation assistance in high traffic areas to assist staff and customers.</li> </ul>	<ul style="list-style-type: none"> <li>• Language Access Coordinator</li> <li>• Communications &amp; Marketing</li> <li>• Division Heads</li> </ul>	Completed
Milestone 2	<ul style="list-style-type: none"> <li>• Post signage and add to website that licensing materials for the five categories have been translated into the 10 languages.</li> </ul>	<ul style="list-style-type: none"> <li>• Language Access Coordinator</li> <li>• Communications &amp; Marketing</li> </ul>	July 15, 2021



	<b>Goal #3: Enhance staff awareness and ability.</b>	<b>Responsible Staff</b>	<b>Deadline</b>
Milestone 1	<ul style="list-style-type: none"> <li>Post copy of updated language access implementation plan and necessary guides on the agency's intranet</li> </ul>	<ul style="list-style-type: none"> <li>Language Access Coordinator</li> </ul>	May 26, 2021
Milestone 2	<ul style="list-style-type: none"> <li>Provide presentation on language access resources during new hire orientation</li> </ul>	<ul style="list-style-type: none"> <li>Language Access Coordinator</li> <li>Human Capital</li> </ul>	Completed.
Milestone 3	<ul style="list-style-type: none"> <li>Annual email to Agency on all information regarding language access</li> </ul>	<ul style="list-style-type: none"> <li>Language Access Coordinator</li> </ul>	May 30, 2021
Milestone 4	<ul style="list-style-type: none"> <li>Division heads to provide division-specific training to staff and track</li> </ul>	<ul style="list-style-type: none"> <li>Language Access Coordinator</li> <li>Division heads</li> </ul>	Deadline varies by division.
Milestone 5	<ul style="list-style-type: none"> <li>Provide annual language access refresher training to all staff in the annual Mandatory Customer Service Training</li> </ul>	<ul style="list-style-type: none"> <li>Language Access Coordinator</li> <li>Human Capital</li> </ul>	Deadline determined by Human Capital.
Milestone 6	<ul style="list-style-type: none"> <li>Update internal language bank of multilingual agency staff.</li> </ul>	<ul style="list-style-type: none"> <li>Language Access Coordinator</li> <li>Division Heads?</li> </ul>	August 31, 2021
	<b>Goal #4: Improve accessibility of website</b>	<b>Responsible Staff</b>	<b>Deadline</b>
Milestone 6	<ul style="list-style-type: none"> <li>Add a note about interpretation services on the Contact Us section on the website.</li> </ul>	<ul style="list-style-type: none"> <li>Language Access Coordinator</li> <li>Communications &amp; Marketing</li> </ul>	Completed.

## Exhibits

Wall Poster



<b>English</b>	We will help you in the language you prefer. Ask for free interpretation assistance at Reception.
<b>Spanish</b>	Le ayudaremos en el idioma que prefiera. Solicite asistencia de interpretación sin costo en la Recepción.
<b>Arabic</b>	سنساعدك باللغة التي تفضلها. اطلب مساعدة للترجمة الفورية مجاناً من مكتب الاستقبال.
<b>Bengali</b>	আমরা আপনার পছন্দের ভাষায় আপনাকে সাহায্য করবো। রিসেপশন-এ বিনামূল্যে আপনার পছন্দের ভাষায় ব্যাখ্যা সহায়তার জন্য বলুন।
<b>Simplified Chinese</b>	我们能使用您偏好的语言为您提供协助， 请至接待区询问关于免费口译协助事宜。
<b>Traditional Chinese</b>	我們能使用您偏好的語言為您提供協助。 請至接待區詢問關於免費口譯協助事宜。
<b>Haitian Creole</b>	N ap ede ou nan lang ou pito a. Mande èd entèpretasyon gratis nan Biwo Resepsyon an.
<b>Italian</b>	Vi aiuteremo nella vostra lingua preferita. Chiedete l'assistenza gratuita di un interprete alla reception.
<b>Korean</b>	원하시는 언어 서비스를 제공해 드립니다. 접수처에서 무료 통역 서비스를 요청하십시오.
<b>Russian</b>	Мы можем предоставить вам помощь на языке, который вы предпочитаете. Для получения бесплатных услуг перевода обращайтесь в регистратуру (Reception).

Inspector Handout/Desktop Signage

Last updated: 8/19/2021

# Interpretation Service Available

## English Translation:

Hello, I'm an inspector from the City's Department of Consumer Affairs. Please point to your language, and I will call an interpreter for the inspection. Language assistance is free.

<p><b>Arabic</b> </p> <p>مرحباً أنا مفتش من إدارة المدينة لعلاقات المستهلك. الرجاء الإشارة الي لغتك و سأصل بمرجم للتفتيش. خدمة مساعدة اللغة مجانية.</p>	<p><b>Korean</b> </p> <p>안녕하세요, 저는 시에서 운영하는 소비자 보호위원회 소속 조사원입니다. 본인의 사용가능한 언어를 말씀해주시면 조사철차를 위해 통역사에게 연락을 취하도록 하겠습니다. 통역서비스는 무료입니다.</p>
<p><b>Bengali</b> </p> <p>হ্যালো, আমি সিটি'র উপ ভোক্তা বিষয়ক অধিদপ্তরের(Department of Consumer Affairs)একজন পরিদর্শক। অনুগ্রহ করে আপনার ভাষা নির্দেশ করুন, এবং আমি পরিদর্শনের জন্য একজন দোভাষীকে ডাকব। ভাষা সহায়তা বিনামূল্যে ভাষা সহায়তা দেওয়া হয়।</p>	<p><b>Mandarin</b> </p> <p>您好，我是本市消费者事务局的视察员。请您指出您所用的语言，我会请一位口译员来协助视察。翻译服务是免费的。</p>
<p><b>Cantonese</b> </p> <p>您好，我是本市消費者事務局的視察員。請您指出您所用的語言，我會請一位口譯員來協助視察。翻譯服務是免費的。</p>	<p><b>Polish</b> </p> <p>Witam, jestem inspektorem z Miejskiego Wydziału Do Spraw Klientów. Proszę wybrać język, po czym zadzwonię po tłumacza w celu przeprowadzenia kontroli. Pomoc tłumacza jest bezpłatna.</p>
<p><b>Farsi</b> </p> <p>سلام، من بازرس اداره امور مصرف کنندگان شهر هستم. لطفاً زبان مورد نظر خود را نشان دهید تا من برای انجام بازرسی با یک مترجم تماس بگیرم. خدمات ترجمه رایگان میباشد.</p>	<p><b>Portuguese</b> </p> <p>Olá, sou um inspetor do Departamento de Defesa do Consumidor da Cidade. Por favor, indique seu idioma e chamarei um intérprete para a inspeção. A assistência com idiomas é gratuita.</p>
<p><b>French</b> </p> <p>Bonjour, je suis Inspecteur au Département des consommateurs de la ville. Veuillez m'indiquer votre langue et j'appellerai un interprète pour l'inspection. Le service d'interprétation est gratuit.</p>	<p><b>Punjabi</b> </p> <p>ਸਤ ਸ੍ਰੀ ਅਕਾਲ, ਮੈਂ ਸ਼ਹਿਰ ਦੇ ਉਪਭੋਗਤਾ ਮਾਮਲਿਆਂ ਦੇ ਮਹਿਕਮੇ ਵਿੱਚ ਇੱਕ ਜਾਂਚਕਰਤਾ ਹਾਂ। ਕਿਰਪਾ ਕਰਕੇ ਆਪਣੀ ਭਾਸ਼ਾ ਦੀ ਚੋਣ ਕਰੋ ਅਤੇ ਮੈਂ ਜਾਂਚ ਲਈ ਇੱਕ ਦੁਬਾਸ਼ਿਏ ਨੂੰ ਬੁਲਾ ਲਵਾਂਗਾ। ਭਾਸ਼ਾ ਸਹਾਇਤਾ ਮੁਫਤ ਹੈ।</p>
<p><b>Haitian Creole</b> </p> <p>Alo, mwen se yon enspektè Depatman Zafè Konsomatè Vil la. Tanpri lonje dwèt ou sou lang ou pale a, epi m ap rele yon entèprèt pou enspeksyon an. Gen ed nan lang ki gratis.</p>	<p><b>Russian</b> </p> <p>Здравствуйте! Я инспектор городского Управления по делам потребителей. Укажите свой язык, и мы вызовем переводчика для проведения проверки. Перевод предоставляется бесплатно.</p>
<p><b>Hebrew</b> </p> <p>שלום, אני מבקר מטעם מחלקת הצרכנות בעירייה. אודה לכם אם תוכלו להצביע על השפה שלכם כדי שאוכל לקרוא למתורגמן לצורך הביקורת. השימוש במתורגמן אינו כרוך בתשלום.</p>	<p><b>Spanish</b> </p> <p>Hola, soy inspector del Departamento de Asuntos del Consumidor de la ciudad. Señale su idioma y llamaré a un intérprete para la inspección. El servicio es gratuito.</p>
<p><b>Hindi</b> </p> <p>नमस्ते, मैं शहर के उपभोक्ता संबंधित मामले विभाग में एक निरीक्षक हूँ। कृपया अपनी भाषा इंगित करें और मैं निरीक्षण हेतु आपके लिए अनुवादक को बुला लूँगा। भाषा सहायता नि:शुल्क है।</p>	<p><b>Thai</b> </p> <p>สวัสดี ข้าพเจ้าเป็นผู้ตรวจราชการจากแผนกผู้บริโภค สภากงกันแห่งของเทศบาล กงมำซึ่งบอกภาษาของกุงมำ และข้าพเจ้าจะ ไทรศัพท์ที่คิดค่อลอมำสำหรับการสืบสวนนี้ การใช้ลอมำนี้ ไม่คิดค่าบริกา</p>
<p><b>Italian</b> </p> <p>Buongiorno, sono un ispettore del Dipartimento Municipale per la Tutela dei Consumatori. Per favore indichi la sua lingua, in modo che io possa chiamare un interprete che mi affianchi durante l'ispezione. L'assistenza dell'interprete è gratuita.</p>	<p><b>Urdu</b> </p> <p>ہیلو، میں شہر کے محکمہ امور صارفین کا ایک افسر ہوں۔ براے مہربانی اپنی زبان کی طرف اشارہ کیجئے، اور میں تفتیش کیلئے ایک مترجم کو بلاؤں گا۔ زبان کی مدد مفت ہے۔</p>
<p><b>Japanese</b> </p> <p>こんにちは。市消費者事務局の調査員です。ご使用の言語をご指定いただければ、調査の際に通訳をご用意いたします。言語のアシスタンスは無料でご利用いただけます。</p>	<p><b>Vietnamese</b> </p> <p>Xin chào, tôi là thanh tra của City's Department of Consumer Affairs (Bộ Đặc trách Vấn đề Người Tiêu Dùng của Thành phố). Vui lòng chỉ vào ngôn ngữ của quý vị, tôi sẽ gọi một phiên dịch đến trợ giúp việc kiểm tra. Dịch vụ trợ giúp ngôn ngữ được cung cấp miễn phí.</p>



# **AGENCY LANGUAGE ACCESS PLAN**

**NEW YORK CITY DEPARTMENT OF DESIGN AND CONSTRUCTION**

**2021**

# I. Agency and Language Access Coordinators

The agency name: New York City Department of Design and Construction

The agency's language access coordinators:

- Craig M. Greene, Director of Equal Employment Opportunity
- Dalela Harrison, Associate Commissioner

Link to agency's website: <https://www1.nyc.gov/site/ddc/about/EEO.page>

## II. Agency Mission and Background

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. We build the city.

**Services offered:** 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 and more. To successfully manage our portfolio, we collaborate with other City agencies, as well as with emerging and world-renowned architects and consultants. Our work doesn't stop at buildings—we also design and improve vital infrastructure. Our staff delivers roadway, sewer and water main construction projects in all five boroughs. We provide sidewalks, street reconstruction, water mains, sewers, and pedestrian ramps—quality infrastructure that is essential for a healthy, resilient city.

### Public Buildings Division

Our Public Buildings Division manages the design and construction of a large range of civic buildings. Some of these projects include facilities for public safety, cultural institutions, and health and human services. DDC has a vast knowledge base in building design, as well as energy saving technologies, and construction methodology.

### Infrastructure Division

Our work doesn't stop at buildings—we also design and improve vital infrastructure. New York City has the most extensive network of streets, water mains, and storm and sanitary sewers. We build and upgrade this system, while also taking care of step streets, retaining walls, pedestrian ramps, bridges and plazas. Our client agencies—the Department of Transportation (DOT) and the Department of Environmental Protection (DEP)—furnish the planning and funding for these projects. It's our job to provide the highest standard of engineering design and construction management required for successful delivery. In addition, we help local businesses keep their doors open—through our innovative trenchless technologies which reduce disruption to commercial activities during construction. We provide infrastructure that is essential for a healthy, resilient city.

### **Office of Community Outreach and Notification (OCON) {Direct Service Area}**

Construction can sometimes create inconveniences to businesses and residential communities. Our Office of Community Outreach and Notification (OCON) ensures that communities are heard and informed throughout the construction process. For most projects, a dedicated Community Construction Liaison (CCL) is assigned to help the resident engineer address any community issues and concerns. We also prepare and distribute 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.

### **Community Partnerships and STEAM Initiatives {Direct Service Area}**

The Department of Design and Construction's STEAM (Science, Technology, Engineering, Architecture, Mathematics) outreach program serves as an intern and entry-level pipeline for our agency, while supporting schools in providing a holistic educational approach for students. We introduce students and their parents to the broad range of STEAM careers, encouraging empowerment and confidence in students' performance in math and science. Inclusivity is valued during all stages of our work; we strive to share our knowledge and research, as well as create lasting partnerships. Above all, we believe in equal access to information, resources, and communication tools as it relates to STEAM programs and careers. That includes ensuring that parents with Limited English Proficiency understand the benefits of the program and its offerings.

## **III. DDC's Language Access Policy and Goals**

- The agency's policies around language access:

The purpose of this policy is to establish guidelines, for ensuring equitable services and access for individuals with limited English proficiency (LEP).

DDC recognizes the importance of effective and accurate communication between our agency and the city we serve. As part of our policy, we are committed to taking steps to provide timely and meaningful access to information and to ensure that language is never a barrier to opportunity as it relates to the services and information that we provide the public.

- The overall goals of the agency's language access implementation plan is outlined below:
- Our Agency's Language Access goals include:
  - Providing meaningful access to information and services, for all New Yorkers.
  - Implementing procedures, in compliance with EO 120 and Local Law 30, to improve information flow to the public.
  - Ongoing plain language communication regarding agency programming, timelines, construction impact and project completion.
  - Ongoing community outreach and effective information sharing
  - Encouraging multilingual staff to participate in DDC's Volunteer Language Bank.
  - Developing an annual agency campaign to inform members of the public that language assistance services are available for people with Limited English Proficiency (LEP).

- Train public facing staff, in assisting LEP constituents with language services.
- Encourage multilingual staff to participate in DDC’s Volunteer Language Bank.

DDC’s Language Access Implementation Plan will be reviewed on an annual basis, and the LAC will institute ongoing measures to monitor its success. The LAC will leverage the previous guidelines and requirements of Executive Order 120 (EO 120) of 2008 and LL30 and collaborate with the Mayor’s Office of Immigration Affairs (MOIA) in executing the goals of this plan.

## IV. Agency language access accomplishments and progress on goals from previous LAIP

Goal	Update
Encourage multilingual staff to participate in DDC’s Volunteer Language Bank.	We have done this at DDC since 2017 however with attrition and other changes in staff this will be an ongoing effort.
Enhancing community outreach and effective information sharing	This too, is an ongoing effort, but something that DDC has done successfully since the inception of the Language Access Plan requirement
Because DDC is not out-facing the types of materials that are translated remain the same	We continue to use previously-translated Residential Community Surveys as needed to assess the needs of community members where our construction occurs.

## V. LEP Population Assessment

### Four-Factor Analysis

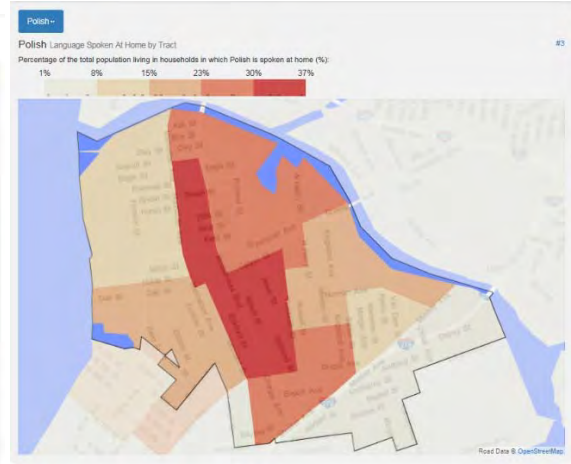
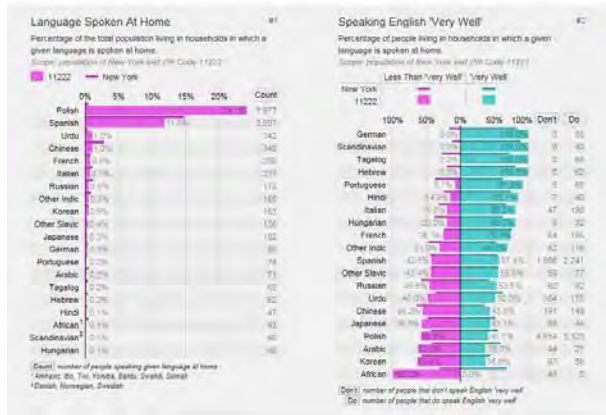
DDC continues to be guided by the Department of Justice’s Four-Factor Analysis in evaluating the limited English proficient (LEP) populations served by the agency. This methodology provides a balanced assessment of language assistance needs while allowing flexibility to adjust language assistance measures. DDC is committed to providing information and services to diverse population through community outreach, inclusive publication, and language access. Our plan incorporates additional data sources to evaluate the language access needs of our service population, including supplemental languages.

### Factor 1: LEP Service Population and Demographic Analysis (Number of LEP in eligible service population - demographic analysis)

DDC builds for all of New York City which includes each of the 5 boroughs and the populations within. Currently, the limited English proficient (LEP) population varies Citywide. Based on Census data from the Department of City Planning, roughly 24% of New Yorkers have LEP. In assessing the LEP population served by DDC, we analyze our active and upcoming construction and service

areas, by geographic location, using census data, as well as StatisticalAtlas.com which provides composition data regarding race, ethnicity, and language proficiency by ZIP code.

Languages in ZIP Code 11222, New York (ZIP Code)





## Factor 2: LEP Data Tailored Specifically to DDC (Frequency agency is in contact with LEP. Incorporate demographic data, agency intake forms, language service provider data, employee survey results)

We use 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 were translated into the Local Law 30 languages (Arabic, Urdu, French, Polish, Spanish, Chinese (Traditional and Simplified), Russian, Bengali, Haitian Creole, and Korean) in 2017. Our Community Constructions Liaisons (CCL's) use the community surveys in conjunction with our recently revised language identification guide, to help recognize the primary language of individuals with Limited English Proficiency. DDC will also continue using demographic data surveys, as mentioned in Factor 1, to ensure DDC is providing adequate language coverage.

## Factor 3: Services Requiring Language Assistance Measures (importance/benefit of service, information and consequence of inadequate interpretation)

DDC recognizes that removing language barriers is critical to achieving greater access and effective communication regarding the agency's projects on New York City streets. DDC's project distribution documents provide transparency to the public about what is happening in their community, and the impacts of planned construction on their neighborhood. These announcements include public notices regarding the location and nature of planned construction, water supply shut off, outages, closures, and other temporary neighborhood impacts. Our Construction Project Information Cards/Fact sheets, Quarterly Newsletters, and advisories are integral to service delivery and information sharing. These documents, along with standard survey forms and the STEAM programmatic brochure for parents and students, are most essential to our communication with the public. On-call Interpretation services are also available to assist CCL's with on-site communication as well.

**Infrastructure Upgrades Along Leonard Street**

**Project Contact:**  
Tully Construction, Corp. Inc.  
1100 1st Ave.  
Brooklyn, NY 11217

**Project Information:**  
Work operations will occur along Leonard Street between 47th Avenue and 48th Street.

**Construction Hours:**  
Monday - Friday 7:00am - 6:00pm

**DDC Notice:**  
We are upgrading infrastructure along Leonard Street to ensure the delivery of necessary services.

**DDC Website:**  
www.nyc.gov/ddc

**Reconstruction of Grand Concourse Service Roads**

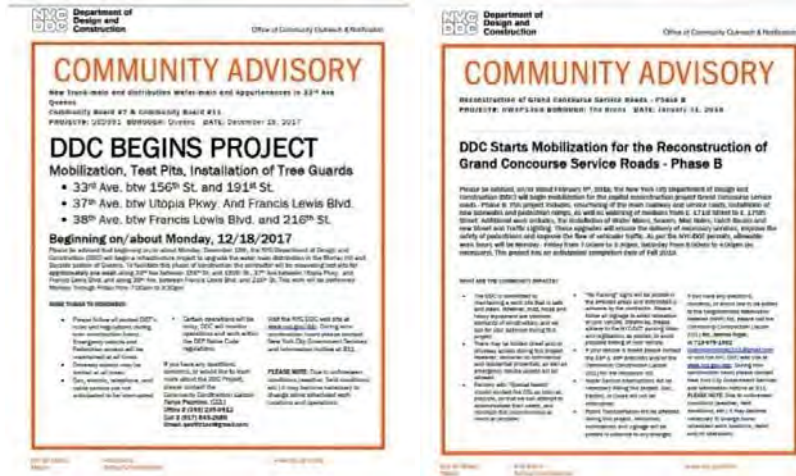
**Project # HWXP136A**

**Location:**  
E. 172nd St. to E. 165th St. and Side Streets

**Construction Hours:**  
Monday - Friday 7:00am - 6:00pm

**DDC Notice:**  
We are reconstructing Grand Concourse Service Roads along the 172nd St. to E. 165th St. and Side Streets area.

**DDC Website:**  
www.nyc.gov/ddc



#### Factor 4: Resources Designated for Language Assistance Services

- Language Line: Language Line’s team includes nearly 9,000 professional interpreters, that are fluent and certified in more than 240 languages. DDC has contracted with Language Line to provide over-the-phone interpretation, as well as document translation services. The resource is available to CCL’s and DDC staff members whose work involves direct interactions with communities, served by our agency.
- Volunteer Language Bank: DDC developed an internal Volunteer Language Bank of multi-lingual staff members who offer written and oral translation support.
- DDC revised its Language Identification Guide to identify the primary language of community members. DDC will provide training to staff on the procedures of identifying the primary language and connecting with Language Line.



Based on the above analysis and additional sources of demographic information, including for specific projects, we believe that DDC’s plan outlines the language needs of the agency and assesses whether some or all of its direct public services should be provided in a language or languages supplemental to the designated citywide languages.

## VI. Provision of Language Access Services

- DDC provides **language access services** in the designated citywide languages. DDC's Language Access Coordinator evaluates language needs based on project location and Community requests using tools like census data, as well as, StatisticalAtlas.com. These assessments ensure the agency is providing necessary language services in the communities we are serving. We have translated regularly published documents into the citywide designated languages including Arabic, Bengali, Chinese (simplified and traditional), French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu to ensure optimal efficacy for neighborhoods with significant LEP populations. In addition, DDC provides in-person interpretation as needed, including at outreach events and public hearings.
- DDC will provide language access services through various means including utilizing our Office of Community Outreach and Notification to assess translation and language updates prior to planned distributions of Project Information Cards (PIC), quarterly newsletters, and advisories to the businesses and residents in the neighborhoods where construction projects take place. These publications are used to inform the public about project status and the impact and duration of construction and are published on an as need basis. DDC previously translated business and residential survey forms in Arabic, Bengali, French, Haitian Creole, Korean, Polish, Russian, Simplified Chinese, Spanish, Traditional Chinese and Urdu, in order to meet the ongoing language access needs of New Yorkers impacted by our construction projects. In addition, DDC will ensure the quality of final translations through staff and contracted services.
- DDC has made effort to provide agency related translation and interpretation services, as part of our emergency response, to the extent possible. In the event that access to our work site is limited, DDC has updated our agency website which has a language translation feature for optimal access and includes options for translation to all of the designated citywide languages.
- DDC has considered language access in agency communications, including emergency notifications, public hearings and events, press releases and other communications to the public. DDC has updated signage at our construction sites to reflect multilingual communication options and provision of free interpretation services related to project inquiries. Our website remains available for translation through the "Translate This Page" option. In addition, the public can now submit complaints and requests for translations or inquiries through our website email at: <https://www1.nyc.gov/site/ddc/about/EEO.page>
- DDC utilizes business and residential surveys, also known as project profiles, for canvassing neighborhoods and assessing needs during the preconstruction phase and beyond. The documents have been assessed to ensure that they are written in plain language. The plain language assessment applies to all documents that are translated. DDC's Language Access Coordinators regularly evaluate language usage to ensure clarity of communication.
- DDC leverages bilingual CCL's and staff for community translations at construction sites; we supplement those measures with Language Line's translation and interpretation services in more than 240 languages, for additional language assistance support, when onsite translation is otherwise unavailable. We utilize our Language Identification Guide to identify the primary language of LEP. DDC will provide training to staff on the procedures of identifying the primary

languages and then connecting with Language Line. DDC will continue to develop our Volunteer Language Bank, as well as, and solicit assistance in reviewing translated documents.

- LAC Craig Greene along with Michael Estabrook, Director of Creative Services, will project manage translation requests

#### Translating Essential Documents

DDC's Office of Community Outreach and Notification regularly distribute Project Information Cards (PIC), quarterly newsletters, and advisories to the businesses and residents in the neighborhoods where construction projects take place. These publications are used to inform the public about project status and the impact and duration of construction. DDC 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 staff and contracted services.

#### Interpretation Services

CCL's engage with community members throughout all phases of construction. When an individual's preferred language is not easily identifiable, CCL's can utilize our Language Identification Guide to help identify the primary or preferred language of individuals with LEP and contact Language line telephonic interpretation services, as needed. DDC will provide training to new and seasoned CCL's and staff members on the new procedures for respectfully identifying primary language and leverage bilingual CCL's and staff for community translations at construction sites. We will supplement those measures with Language Line interpretation services in more than 240 languages, when on-site translation/ interpretation is unavailable. Finally, we will work to provide interpretation for other agency communications as needed, including outreach events and public hearings. DDC will continue to develop our Voluntary Language Bank, as well as, solicit assistance from the community boards.

- LAC Craig Greene and his team will project manage interpretation requests as well.

#### Notification of Free Interpretation Signage

DDC will update signage at our construction sites to reflect multilingual communication options and the provision of free interpretation services related to project inquiries. This information will also be available on our agency website. Our website remains available for translation in more than 30 languages through the “*Translate This Page*” option. the public can submit complaints and requests for translations or inquiries through our website email link– [accessibility@ddc.nyc.gov](mailto:accessibility@ddc.nyc.gov). DDC’s Language Access Plan is publicly available on our website and updated signage will be posted within 90 days of approval of the Language Access Plan.

#### Emergency Preparedness and Response

In the event of an emergency, DDC will make efforts to provide agency-related translation and interpretation services, to the extent possible. In the event that access to our work site is restricted, DDC will update our agency website which has a language translation feature for optimal access.

## **VII. Training**

Training will be provided for all frontline workers and managers and current staff in direct service/outreach areas. We will arrange for training to include best practices as well as components related to cultural competencies and sensitivity. Training sessions will cover DDC’s language access policy concerning when interpreter services should be provided, as well as procedures regarding use of language identification guides, identifying an individual’s preferred or primary language, arranging for telephonic interpreter services, and recordkeeping and document tracking. The Language Access Implementation Plan and written training materials will be provided to staff and will be available on DDC’s Intranet. The training will be provided by the LAC coordinators. The LAC’s will track training completion along with the Training and Staff Development Unit.

## **VIII. Record Keeping and Evaluation**

DDC will formulate guidelines and procedures for using language services, including tracking and reporting telephonic interpretation calls, location of site, language translation frequency, and length of call. This data will help track languages spoken by customers, assess trends 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. DDC will utilize our Volunteer Language Bank participants to monitor the delivery and quality of its language access translation services and to quality check translated materials, with specific focus on documents that include esoteric words and industry specific terminology. DDC will Track, review, and report on the provision of language services. The agency will consider LL30/language access in conjunction with agency and Citywide equity initiatives and customer service initiatives. In addition, the agency will use metrics like Key Performance Indicators (KPIs) or Objectives and Key Results (OKRs)) to evaluate delivery of services and/or progress on implementation

## Maintaining Records

DDC will maintain records pursuant to our records retention schedule and requirements. We will

- Track Language Line interpretations and translation services through invoices and divisional record keeping
- Maintain demographic assessment data for future reference.
- Maintain digital copies of translated documents, by department and document type.
- Maintain names and locations of staff members who are available to act as interpreters.
- Track the number and type of translated documents produced annually
- Conduct Quarterly review of feedback from the public.
- Conduct Annual review of correspondence received via 311 LEP reporting.

## **IX. Resource Analysis and Planning**

DDC will leverage bilingual CCL's and staff for community translations at construction sites; we will supplement those measures with Language Line's translation and interpretation services in more than 240 languages, for additional language assistance support, when on-site translation is otherwise unavailable. We anticipate using existing contracts for interpreter services and training, in addition to developing our own training materials. DDC will utilize the Language Identification Guide to identify the primary language of LEP. DDC will provide training to staff on the procedures of identifying the primary language and then connecting with Language Line. DDC will continue to develop our Voluntary Language Bank, as well as, and solicit assistance in reviewing translated documents.

DDC will look for ways to expedite essential document translation, while maintaining our standard of quality. And we will work with MOIA to identify additional resources in our language access efforts. DDC will ensure that resources related to language services and this plan are included as a fixed line item on the annual agency budget.

## **X. Outreach and Public Awareness of Language Access Services**

DDC will increase public awareness regarding the availability of our agency's language access services through a multilayered Language Access campaign. Our campaign will encompass messaging and notification distributed digitally and displayed on our agency website, Intranet, as well as at impacted construction sites.

## **XI. Language Access Complaints**

DDC will monitor and respond to public complaints about language access in a timely fashion 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.
  - Complaint resolution will be addressed by assessing the concern and providing immediate and improved access through issue spotting, mitigation, process improvement, transparency, and follow-up
- 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 or 718-391-3131.
  - DDC will be raising awareness about these reporting channels through its aforementioned agency LA campaign.
- Complaint data will be tracked quarterly and DDC will include information about complaints as part of our annual reporting.

## **XII. Implementation Plan Logistics**

Language Access Coordinators

DDC designated Associate Commissioner, Dalela Harrison as its Language Access Coordinator In 2017. Since then, the Director of EEO, Craig Greene was added as a second coordinator. Together, the Language Access Coordinators serve as the primary point of contact for implementing Executive Order 120, Local Law 30 and similar Federal and City mandates and can be reached through the communications channels listed at the end of this section. DDC's coordinators will work collaboratively with agency Senior Staff as well as agency leaders to ensure that the LAP is part of DDC's mission critical priorities.

Our plan provides goals, milestones, and timelines for how to advance language access at the agency, considering each section of the plan and where the agency can improve.

## Language Access Goal and Milestones

Language access goal	Milestones	Responsible staff	Deadline
Develop an E-learning LAC training tool	Develop training presentation	LACs and Training and Staff Development Director	Planning
Share our LAC efforts in other agency communication as part of our internal “Did you know” campaign	Develop content for the Intranet, digital signage	LACs and our Creative Services Team	On-going effort
Re-launch Volunteer Language Bank. DDC’s goal is to have two employee participants for each of the 10 languages required under LL 30.	Our bank originally consisted of 8 employees, who were proficient in 9 languages. Due to attrition and increased responsibility some of the staff are no longer able to participate. We therefore need to restart this initiative	Language Access Coordinators	On-going effort
LAIP will be reviewed twice a year.		Language Access Coordinators	In progress
LAIP will be updated on the DDC website once every 3 years.	DDC will track all updates quarterly to ensure efficacy of LAIP.	Language Access Coordinator	In progress



**DDC LANGUAGE ACCESS COORDINATOR**

DALELA HARRISON, ASSOCIATE COMMISSIONER

CRAIG GREENE, DIRECTOR

**DEPARTMENT OF DESIGN AND CONSTRUCTION (DDC)**

**OFFICE OF EQUAL EMPLOYMENT OPPORTUNITY, EQUITY, AND INCLUSION**

**30-30 THOMSON AVE, 4<sup>TH</sup> FLOOR**

**(718) 391-1776**

**(718) 391-3131**

[Accessibility@DDC.NYC.GOV](mailto:Accessibility@DDC.NYC.GOV)

or

[Harrisoda@DDC.NYC.GOV](mailto:Harrisoda@DDC.NYC.GOV)

[Greenecr@DDC.NYC.GOV](mailto:Greenecr@DDC.NYC.GOV)

# Language Access Implementation Plan Template (2021)

## I. Agency name and agency language access coordinator

**New York City Department of Environmental Protection**

**Language Access Coordinators:**

Sara Pecker, Director of Special Projects & Initiatives

Eileen Alter, Deputy Director, Special Projects & Initiatives

<https://www1.nyc.gov/site/dep/about/language-access.page>

## II. Agency mission and background

The New York City Department of Environmental Protection (DEP) protects public health and the environment by supplying clean drinking water, collecting and treating wastewater, and reducing air, noise, and hazardous materials pollution. DEP is a New York City agency of nearly 6,000 employees that manages and conserves the City's water supply; distributes more than one billion gallons of clean drinking water each day to nine million New Yorkers and collects wastewater through a vast underground network of pipes, regulators, and pumping stations; and treats the 1.3 billion gallons of wastewater that New Yorkers produce each day in a way that protects the quality of New York Harbor. To achieve these mandates, DEP oversees one of the largest capital construction programs in the region. As the City agency responsible for New York City's environment, DEP also regulates air quality, hazardous waste, and critical quality of life issues, including noise.

The Bureaus and Offices responsible for carrying out the agency's mission each perform a level of "direct public service" with NYC residents and businesses through correspondence, community-based meetings, public hearings, issuance of publications and documents, telephone contact, web-based communication, or ongoing face-to-face interaction.

### **Bureau of Customer Services (BCS)**

BCS is responsible for all functions related to water and sewer billing for residents of NYC and certain upstate communities. Additionally, the Bureau contracts for the installation of water meters in uncharged, unmetered buildings and the replacement of old meters and is installing an automatic meter reading system citywide. It inspects the work quality of water meters installed by private plumbers and enforces the city's water use rules. BCS also manages consumer-oriented water conservation programs. The BCS Call Center has completed its upgrade of their Interactive Voice Response (IVR) system. The new enhancements include digital recording and monitoring of all calls for training and quality assurance purposes. Call routing is now available for callers requiring an account specialist, or for LEP customers needing language assistance.

BCS has a borough office in each of the five boroughs where customers can go to pay their water and sewer bills, The Borough Offices are located at the following addresses:

- 1932 Arthur Avenue, Bronx, NY
- 250 Livingston Street, Brooklyn, NY

- 1250 Broadway, New York, NY
- 96-05 Horace Harding Expressway, Corona, NY
- 60 Bay Street, Staten Island, NY

### **Bureau of Environmental Compliance (BEC)**

The Bureau of Environmental Compliance's mission is the enforcement of environmental laws and regulations, which affect the health and safety of the public and environment. Specifically, the bureau enforces the City's Asbestos regulations as well as the Air and Noise Codes. BEC is composed of the Division of Air & Noise Policy, Permitting and Enforcement and the Asbestos Control Program. These divisions respond to air and noise code complaints; inspect and track asbestos removal projects; and foster the goals of environmental protection. Responsibilities also include certifying asbestos handlers, inspecting and issuing operating certificates to stationary combustion and industrial process sources, and implementing the requirements of the Clean Air Act.

### **Bureau of Environmental Planning and Analysis (BEPA)**

BEPA is responsible for conducting all environmental reviews for DEP in accordance with all applicable City Environmental Quality Review (CEQR) and State Environmental Quality Review (SEQR) regulations. In addition, this office provides technical assistance to other City agencies especially in the areas of air and noise quality and hazardous materials. The Office also provides technical assistance for the preservation of natural resources (wetlands remediation and development of natural landscaping plans) and conducts long range planning (population/employment, consumption, and demand/flow) for the agency. BEPA conducts strategic planning to help ensure appropriate forecasting, trend analysis, regulatory review, scientific modeling, and research. It oversees the development of a watershed/sewershed protection plan for Jamaica Bay, is continuing the work of the climate change task force, and helps DEP plan for the new growth stimulated by rezoning throughout the City.

### **Bureau of Police and Security (BPS)**

The Bureau of Police and Security is responsible for protecting the New York City water supply and the associated critical infrastructure from terrorism, pollution, and crime. In addition, the Bureau is also responsible for establishing on-site procedures intended to minimize the potential impact on human health and the environment in the event of a hazardous material incident. The Bureau is divided into four divisions: the Police Department, which patrols the upstate water supply; the Security Division which employs private security guards for protecting in-city facilities; the Security Systems Engineering Division, which designs and implements security systems for the water supply system; and the Division of Emergency Response and Technical Assessment (DERTA), which responds to hazardous material emergencies within the city by evaluating the characteristics of the materials involved and making technical decisions concerning containment, abatement and disposal.

### **Bureau of Wastewater Treatment (BWT)**

The Bureau of Wastewater Treatment maintains the chemical and physical integrity of NY Harbor and other local water bodies and sustains the continued use and viability of the NY water environment through: the removal of organic and toxic pollutants from the City's wastewater; control of discharges

from Combined Sewer Overflows and dry weather bypassing; optimum operation of treatment plant collections system; integration of watershed management concepts into facilities' planning and design; and enforcement of a city-wide industrial pre-treatment and pollution prevention program. To achieve these water quality goals, the Bureau, with an administrative, technical, and field staff of approximately 1,850 employees, operates: 14 water pollution control plants treating an average of 1.3 billion gallons of wastewater a day; 96 pumping stations; 4 CSO retention facilities; 8 dewatering facilities; 490 sewer regulators; and 150 miles of intercepting sewers. The Bureau also manages the Harbor Survey Program for the routine sampling and analysis of the waters in NY Harbor.

### **Bureau of Water and Sewer Operations (BWSO)**

The primary responsibilities of the Bureau of Water and Sewer Operations are: the operation, maintenance and protection of the City's drinking water and wastewater collection (sewer) systems; the protection of adjacent waterways; and the development and protection of the Department's Capital Water and Sewer Design Program. The Bureau also approves and inspects water and sewer connections performed by licensed plumbers and/or authorized contractors. In addition, the Bureau has overall responsibility for the approval and inspection of all public and private construction projects, which could impact on the City's water or sewer systems. For this reason, anyone wishing to build a private sewer, to construct any type of structure on a City sidewalk, to discharge water from a below ground swimming pool into the sewer system, or to connect a service line with the City's water or sewer system for any reason must receive the approval of this bureau. We are also responsible for maintaining and updating all water and sewer information records for the City of New York. Through the maintenance and repair of the City's water and sewer systems, our field forces ensure: (1) that residences and businesses will have an adequate supply of potable water, (2) that there will be sufficient water for fire protection, and (3) that we will have a properly functioning wastewater collection system. Thus, the services we provide extend far beyond the routine day-to-day operation of the water and sewer systems, and include responding to many different problems and emergencies. These include: water main breaks; leaks from water and sewer mains; broken or inoperable fire hydrants; open hydrants; sewer backups; catch basin (street drainage); failures resulting in street flooding; and complaints of poor water pressure, discolored water, or water with taste or odor problems. BWSO is also responsible for the operation of the Staten Island Bluebelt. This is an ecologically sound, cost effective natural alternative to storm sewers, which occupies approximately 15 square miles of land in the South Richmond area of Staten Island. This project preserves streams, ponds and other wetland ("bluebelt") areas, allowing them to perform their natural function of conveying, storing, and filtering storm water. These areas also provide important community open spaces and a diverse wildlife habitat.

### **Bureau of Water Supply (BWS)**

The Bureau of Water Supply manages, operates, and protects New York City's upstate water supply system to ensure the delivery of a sufficient quantity of high-quality drinking water. The Bureau is also responsible for the overall management and implementation of the provisions of the City's \$1.5 billion Watershed Protection Program resulting from the Watershed Memorandum of Agreement (MOA) and for ensuring the City's compliance with the provisions of the Filtration Avoidance Determination. The Bureau conducts extensive monitoring of water quality, both within the City's distribution system and throughout the upstate watersheds. In addition, the Bureau has responsibility for system planning,

engineering, management, and acquisition of lands, enforcement of watershed regulations, and security.

### **Bureau of Public Affairs and Communications (BPAC)**

BPAC manages the public information, community outreach and legislative affairs of the Agency. It is responsible for all press and media inquiries, environmental education, special projects and initiatives, and production of all public information materials, both print and electronic. BPAC also manages the outreach for several regulatory programs including: the Municipal Separate Storm Sewer System Permit (MS4 Permit), Long-term Control Plans (LTCs), the NYC Green Infrastructure Program, Superfund, Grease, and Asbestos. The Community Affairs Unit is the Agency's primary liaison on all monitoring committees, citizen advisory committees, community outreach projects, and service inquiries. BPAC is the bureau that is point for Local Law (LL)-30. It reviews all agency publications to make sure the agency is in compliance with LL-30. These documents are reviewed with the originating bureaus to determine the need for translations into the ten top LEP languages. This initiative is ongoing.

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

The goal of the Department of Environmental Protection's policy around Language Access, is to provide meaningful language access to customers who interact with the agency for essential services and information, based on at least the 10 designated citywide languages; and to provide translations of its most widely distributed documents so that the Limited English Population (LEP) can have access to the same information as the English speaking population.

To enable the LEP population to speak to and interact with all DEP inspectors and public facing employees regardless of the language they speak, the agency has provided staff with telephones (and in the case of inspectors and emergency responders with mobile phones) with which they can access a telephonic interpretation service that covers almost 300 languages. The agency is and will continue to translate essential information and its most widely distributed documents into the ten citywide designated languages and has created a landing page on the DEP website for each of the 10 languages where the documents reside. Widely distributed documents will carry a sentence that directs speakers of the top 10 LEP languages to the appropriate landing page. Each document that is accessible from the landing page will have a short blurb describing its content to correspond to the document in English.

### **IV. Agency language access accomplishments and progress on goals from previous LAIP**

The Bureau of Customer Services (BCS) has five borough offices, one in each borough that provides customer service and inspectorial support to the general public. Customers can come in and speak with employees to schedule inspections, take out a permit, apply for our various programs, make payments and enter into payment agreements.

BCS also has various outreach events throughout the year in which customers can come to a location within their community to talk to representatives to discuss their water bills.

The BCS call center receives calls directly from customers or calls transferred from 311 to assist in various water related inquiries.

BCS has seen an increase in Language Access calls and in person requests. BCS inspectors have continued their use of the 'I Speak' cards and the Voiance telephonic interpretation service that can be accessed through their agency issued cell phone. All call center employees also have access to our Voiance telephonic-interpretation service. The employees that work in the borough offices and at community outreach events also have the 'I Speak' cards, Voiance, and certified bilingual employees available.

Distribution Science and Planning (DSP) within Water Quality/Bureau of Water Supply has two responsibilities for which documents are required to be translated: at-the-tap testing for lead and copper, where free testing kits are provided to the customer (these include sampling instructions, chain of custody forms, and result letters), and the annual *Drinking Water Supply and Quality Report* (DWSQR). All lead and copper documents have been translated into the required languages, except for result letters, which are translated upon request. The DWSQR was not translated in 2020 due to budget constraints but will be translated upon request.

For the lead program, the 311 form for requesting a test kit includes an option to request a different language. If a different language is requested, sampling instructions, chain of custody forms, and result letters are all supplied in the language of choice. The question on language became available in November 2016, and the number of requests by language are stored in the Lead Database and are summarized in the table below. If a person forgets to request a different language, the kit also includes a sheet in the ten languages instructing people to call if they would like translations sent to them.

Year	ARABIC	BENGALI	CHINESE	FRENCH	HAITIAN CR	KOREAN	POLISH	RUSSIAN	SPANISH	URDU
2016*			3	1				2	4	
2017	1	6	37	4	1	2	1	16	46	
2018	8	14	44	8		5	3	19	128	11
2019	30	88	52	19	12	5	1	34	345	23
2020	16	76	34	14	4	1	1	17	251	28

\*2016 is from 11/13/16 onward

The DWSQR language requests (request for a hard copy in another language) have been tracked since 2004. In that time, we have not gotten any requests for a hard copy of the report in another language. In February of 2020, the 2019 Report was posted on the DEP website. As it was not translated, there were no hits for other languages on the website.

DSP has made use of telephonic interpretation when necessary. In 2020, we did not need to use the service, however, one employee in the unit who speaks Spanish spoke with about 30 customers.

Water Quality has made every effort to make sure all materials listed in Section 3 (translation) have been written in plain language. The DWSQR is also reviewed by BPAC. The Annual Drinking Water

Supply and Quality Report is written in plain language, as well as all materials for the at-the-tap lead monitoring program.

Language requests for the DWSQR are tracked in a spreadsheet by DWQO, and different language hits on the website are tracked by the web group. Requests for lead kit instruction in a different language are tracked in the Lead Database.

**Agency language access accomplishments and progress on goals from previous LAIP**

Language Access Goal	Update
Set quarterly LAIP review meetings with Bureau Language Access liaisons	ongoing
Identify and translate widely distributed documents	Complete
Send all translated documents out for secondary review	Complete
Develop descriptive blurbs for each translated document	Complete
Translate document descriptions	Complete
Develop Landing pages for top ten LEP translated documents on DEP website	Ongoing with initial documents posted as completed and new documents translated and added to the page as they are developed
Work with DERTA on development of their Right-to-Know (RTK) Video with closed captioning	Delayed by Covid-19 and will be reviewed again for necessity
Develop Plain Language Review portal for public facing documents	Complete
Plain Language Review Portal finalized	Complete
Design and develop landing pages for translated documents by language	Complete
Identify documents related to issuing permits, licenses and registrations	Complete
Translate all supporting documents	Complete
Post all translated supporting documents on the website	Complete

BWT Goals

Goal	Update
Work with BPAC to translate all BWT forms and/or permits complete by the public into NYC target languages.	Done as of FY 2020
Work with BPAC to address requests for translation of new documents, e.g. COVID-19 health forms to be translated on as-needed basis.	One request from a vendor’s driver was resolved, and BPAC determined that the health form did not need to be translated and distributed, as the vendor was not considered “the public.”

**V. LEP population assessment**

DEP’s population assessment is based on the number of ratepayers that we serve (830,000), as our interaction is primarily based on this population.

- **Factor 1:** the number or proportion of LEP persons in the eligible service population (demographic analysis, e.g., Census data)

**BCS Borough Customer Service Offices (Five Borough Offices):**

BCS Borough Offices determined that it provides direct service to approximately 77,000 walk-in customers each year (Due to Covid, 2020 was significantly less due to the offices being closed for 5 months to walk-in customers). Surveys show that approximately 1,500 customers are served each week at the BCS Borough Office locations. About 2% of these customers request language interpretation.

**BCS Call Center:**

According to the 2020 Voiance report, the Call Center responded to approximately 325,000 customers citywide. Reports and surveys collected by the Call Center Customer Service Representatives indicated that approximately 5% to 7% of all calls taken were in Spanish and/or Mandarin.

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

**BCS Borough Offices and Call Center**

The BCS Call Center and borough office encounter LEP customers on a daily basis. Due to the demand of Spanish callers, the Call Center has implemented a separate call queue that will field callers to certified Spanish representatives. If that queue is backed up in calls, other representatives will take the call and utilize the Voiance translation service to translate the calls. All of the borough offices and field inspectors will continue to utilize the telephonic interpretation service.

The data for the BCS borough offices do not reflect the data needed for LEP customers due to COVID. The borough offices were closed to the public for several months due to the global



pandemic. LEP customers still had access to our Call Center and we continued to have an increase in LEP calls during that time.

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

The Call Center and borough offices are vital customer service operations. They provide information to LEP customers by assisting them in understanding billing issues, water conservation programs, payment inquiries, payment plans, lien sales and any other related water and wastewater issues. In addition, the Call Center provides follow-up calls to the LEP customers to explain billing adjustments, related information, and account updates.

If BCS was unable to provide LEP customers with this service, they would miss vital information given to the public. Many would not understand their bills or notices and most of all we would not be providing excellent customer service.

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

The Call Center has developed a cost-effective strategic plan to address the LEP customer language needs. BCS currently employs several representatives fluent in two of the most requested LEP languages, Spanish and Chinese. BCS continues to recruit new employees with multiple language skills and utilizes its Voiance Language Contract. Voiance is easily accessible when the requested language is not available at the time of the call. The clerical Associate list has a Spanish certification.

	<b>Vendor</b>	<b>2020</b>	<b>Cost</b>
<b>Telephonic Interpretations</b>	Voiance	981	\$7,515.63
<b>Written Translations</b>	Voiance	0	\$0.00
<b>Bilingual Skills Testing</b>	Language Line	1	\$250.00

Due to the global pandemic, BCS did not accept as many calls in 2020. The borough offices and call center was closed for a couple of weeks.

Bilingual testing was not completed because there were no new hires during the year as well.

The bureau spent approximately \$7,500 on Voiance Interpretation service in 2020.

The agency spent \$32,000 on translation services (Geneva, Erikson) in 2020.

**VI. Provision of language access services**

BCS

Voiance- (Telephonic Interpretation Service)

Language Line- (Language Certification)

The Clerical Associate list has a Spanish certification. The bureau has asked the agency to call the Spanish certification list in order to employ people who are able to translate calls. Those employees are then tested and certified through Language Line in their specified language.

The bureau provides annual training for frontline staff and managers on the agency's language access obligations and policies and procedures to provide interpretation, translation, and language access.

The bureau has a training unit that keeps track of all front-line employee annual trainings, including those that have been trained and those that need to be trained.

The bureau currently has a stable outreach workforce, and is considering providing a refresher course for them.

- **Translation services**

Agency-wide

The agency determined which of its documents were most widely distributed after reviewing the documents generated by each of its bureaus. The agency had translated the majority of these documents into the ten designated languages; however, a number of those documents received additional edits from the Mayor's Office of Customer Service.

Each document is reviewed as it comes up for reprinting, updating, and/or revision. Everything that the bureaus develop would be posted online and is reviewed by the agency language access coordinators who speak to the bureaus to see what they need to translate, regardless of how widely or narrowly distributed it is. It has to do with the need by the audience and not the volume.

Translation of documents is project managed by the Special Projects and Initiatives Coordinator.

The agency uses its professional translation service – Geneva – to translate all its documents, and uses an additional language translation service – Eriksen – for secondary reviews to ensure quality control.

Translated materials are primarily available digitally.

Staff are aware of agency translation services through their bureau language access coordinators.

**Interpretation services**

To enable the LEP population to speak and to interact with all DEP inspectors and public facing employees, regardless of the language they speak, the agency has provided public facing staff with the ability to access a telephone interpretation service that covers nearly 300 languages (and in the case of inspectors and emergency responders with mobile phones in order to do so). This will enable almost everyone in the agency to have a three-way conversation in nearly 300 languages.

The vendor for both BCS and agency-wide is Voiance language services. BCS continues to utilize its Voiance Language contract for telephonic interpretation.

The BCS call center also recruits employees with multiple language skills to assist with Spanish and Chinese customers, which are the two most requested languages encountered by the bureau.

The Clerical Associate list has a Spanish certification. The bureau has asked the agency to call the Spanish certification list in order to employ people who are able to translate calls. Those employees are then tested and certified through Language Line in their specified language.

DEP's Call Center, Collections Unit, and Borough Offices are equipped with dual headsets to facilitate telephonic interpretations for LEP customers.

The Bureau of Public Affairs and Communications has an additional contract with Voiance for telephonic interpretation that is available for use by the bureaus within the balance of the agency, and instructions on how to utilize the service has been made available to every employee on the agency's SharePoint site, and that can also be accessed on their mobile phones by inspectors and other emergency responders.

It is Agency Policy to provide telephone translations for all those who request it.

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

Working with MOIA, DEP elevated Language Access to a more accessible spot on the DEP website, which is now found below the "Pay My Bills" section on the homepage: <https://www1.nyc.gov/site/dep/index.page>

Working with the Special Projects and Initiatives Unit, language was developed, translated, and published to the website, and a Language Access navigation item was created within Publications :<https://www1.nyc.gov/site/dep/about/language-access.page>

We believe this should fulfill both our LL30 requirements, and MOIA's request to elevate Language Access on the DEP website.

- **Plain language**

Working with DEP's Office of Business information Technology (BIT), BPAC developed a SharePoint site for a plain language review of all documents being requested by the bureaus for original documents, reprints, updates, etc. before they are sent for design and printing. This information is disseminated to the bureaus by the bureau language access coordinators. DEP has also had training provided for a number of employees in the bureaus, and has a Director of Customer Engagement, who is working closely with the Agency Language Access Coordinators and the Chiefs of Staff of the various bureaus that interact with customers to ensure that they consider all customer related information is written in plain language, and translated appropriately for the LEP population.

- **Policies and Procedures**

DEP has provided information available to all employees on how to access interpretation services, and plain language of documents on the agency's SharePoint site. In addition, they can speak with their bureau LACs.

- **Notification of free interpretation signage**

In all of the BCS borough offices, a greeter is stationed at the entrance and will inform customers of the translation service once requested. The bureau also utilizes language cards developed by the Mayor's Office of Operations and Immigrant Affairs that customers can use to point to the language that they speak. In addition, they use the City's "I Speak" cards for Interpreting Services template for identifying the language the LEP customer speaks to let the greeter know that an interpreter is needed.

- **Languages beyond the top 10**

Each document is reviewed as it comes up for reprinting, updating, and/or revision. The agency language access coordinators speak to the bureaus to see what they need to translate, regardless of how widely or narrowly distributed it is. It has to do with the need by the audience and not the volume.

DEP has translated a number of documents into more than the top ten languages, including Yiddish and Italian. The agency has also translated documents for specific constituencies, such as the 'Dry Cleaners Guide' in Korean.

- **emergency preparedness and response.**

In an emergency we work with the New York City Emergency Management Office (NYCEM) and they are lead. If need be, we would work with Voiance for language interpretation, and our other vendors for translations.

DEP's current translation service for the Bureau of Water Supply is able to provide translations related to Boil Water alerts within the federally mandated guidelines for notifications, and templates for Boil Water notices have been translated into the ten designated languages.

The plan addresses how the agency makes licenses, permits and registrations (LPRs) accessible, if applicable.

The agency has a limited number of licenses, permits, and registrations related to the public, and which were determined between the agency and the Mayor's Office of Immigrant Affairs (MOIA).

- The agency provides instructions in 10 languages on how to apply for licenses/permits/registrations it issues and has them posted online.
- Applicants can call a phone line where staff can use telephonic interpretation in order to apply or submit necessary information, which is advertised in 10 languages on the agency website.
- Applicants can receive language assistance while filling out an application by coming to a walk-in location, which is advertised in 10 languages on the agency website

- The agency has multilingual navigation in 10 languages that directs users with limited English proficiency to application information in their language.

Inspections can be conducted in any number of languages using the agency's vendor Voiance. Inspectors are supplied with agency issued mobile phones and instructions for accessing Voiance are supplied to staff.

## **VII Training**

BCS Training for language services includes:

- Legal obligations and agency policy on language access (including Local Law 30)
- When and how to use telephonic interpretation
- When and how to use in-person interpretation
- When and how to request translation services
- How to identify the primary language of a person with LEP
- How to provide customer service to individuals with LEP

Training is provided by a professional training staff, who track the frontline staff for refresher training. The bureau is also looking at providing outreach staff with refresher training as well.

## **VIII Record keeping and evaluation**

BCS tracks the language spoken by customers/clients seeking services. BCS tracks invoices for interpretive services, and monitors and records the information on customer files.

DEP has a Director of Customer Engagement, who is working closely with the Agency Language Access Coordinators and the Chiefs of Staff of the various bureaus that interact with customers to ensure that they consider all customer related information is written in plain language, and translated appropriately for the LEP population.

A bureau liaison at each BCS borough office sends the Manager of the borough office quarterly reports on the number of LEP requests encountered at each office. These reports are reviewed to assess the effectiveness of the Language Access Plan in each of the five borough offices and to evaluate the LEP customer assistance.

The call center maintains a log for all LEP calls requiring the assistance of a bilingual customer service representative or interpretation service participation. The log is used to measure current utilization and to assess future staffing requirements. Information is captured daily, submitted weekly for in-house compiling and internal reporting, and reported monthly in the bureau's metrics data.

Other bureaus do not meet with the public with the same frequency and volume and are just beginning to keep these kinds of records.

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

The Agency makes language access a priority and there is an open budget for providing interpretation and translations.

DEP has already provided the following resources over the course of the prior three years:

Mobile phones have been provided to DEP Police, inspectors, and other staff that interact with the public outside of DEP's offices. Language interpretation services were contracted for, and instructions on how to access the service is available on the agency's SharePoint site.

All DEP widely distributed public facing documents have been translated into the ten designated languages.

DEP has developed an LEP Language landing page on its website to make it user friendly and where a speaker of any of the ten citywide designated languages can find any widely distributed documents translated in there language.

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

DEP has informed its Bureaus and Offices of Local Law 30, ordering each City Agency to create a Language Access policy and Implementation Plan that will ensure meaningful access to the services the agency provides.

Information about the DEP Language Access plan appears on our website and is also disseminated through social media channels.

DEP will continue to ensure that all translated documents are posted on its website. This project remains on-going as DEP continues to review and translate documents where necessary. Widely distributed documents will direct the LEP Population to a landing page where they will find a fully translated copy.

All bureau offices and public facing windows have Language Identification signage and all inspectors will carry language identification cards.

## **XI. Language Access complaints**

No language access complaints have been received by the Agency.

In the event of any future language access complaints, a system has been set up to ensure that the language access complaints will be investigated and action taken to ameliorate them. All complaints received will be reviewed by the Commissioner's Office staff, and then sent to the appropriate bureau recipients as well as the agency language access coordinators to make sure that complaints will be investigated and resolved. In addition, the Commissioner's Office staff will review every complaint to see if there is any language access component included, and the same procedure will be followed as for the individual language complaints.

BCS has NYC feedback cards at all borough office locations as well as at their outreach events so that residents can give the bureau any type of feedback relating to their service or experience. Complaints may also be submitted through 311 and on the agency's website, as well as on social media and through correspondence.

## **XII. Implementation plan logistics**

*This section addresses the following provisions from LL30:*

In order to maximize resources effectively, Language Access services provided by BCS will utilize a hierarchy for service provision. Borough Office and Call Center bi-lingual staff in the languages each operation supports. If an LEP customer speaks a language that is not supported by this level of staff, assistance will be provided through its respective translation and interpretation contracts. This will allow the bureau to maximize the dollars allocated to the contracts.

DEP has contracts in place for both translation and interpretation services that are accessible by every bureau to provide assistance in nearly 300 languages to accommodate any requests from the public for written and interpretive services.

All language service contracts will continue to be in place moving forward as part of the agency's Language Access Implementation Plan.

Future Goals

Language access goal	Milestones	Responsible staff	Deadline
Continue quarterly LAIP review meetings with bureau liaisons	Every three months	Agency Language Access Coordinators (LAC)	Ongoing
Continue reviewing new documents for plain language	Follow up with bureau coordinators	Agency LACs Director of Customer Engagement	ongoing
Continue reviewing new and revised documents to see if they require translation	Within two weeks of document completion	Agency LACs Director of Customer Engagement Bureau Liaisons	Ongoing
Acquire service for Simultaneous' translations for agency and community meetings where applicable	Signed contract for services	DEP web group LACs	By end CY 2021
Acquire access to Zoom Platform as Zoom has a feature that allows for simultaneous interpretation.	Signed contract for services	DEP web group LACS	By end CY 2021
Continue to develop virtual activities (tours, programming, etc.)	Completion of each activity	LACs Special Projects and Initiatives Team	Ongoing



# Department for the Aging (DFTA) Language Access Policy and Plan May 2021

## I. Agency Name and Agency Language Access Coordinator

Agency name	Department for the Aging (DFTA)
Name of the agency’s Language Access Coordinator (LAC) and all office titles held by this individual.	Sandy March, Senior Analyst
Link to the agency’s Language Access Implementation Plan (LAIP) posted on the agency’s website.	<a href="https://www1.nyc.gov/site/dfta/about/language-access-plan.page">https://www1.nyc.gov/site/dfta/about/language-access-plan.page</a>

## II. DFTA Mission and Background

### Agency Mission

New York City Department for the Aging’s mission is to work to eliminate ageism and ensure the dignity and quality-of-life of New York City’s diverse older adults, and for the support of their caregivers, through service, advocacy, and education.

### Background

The New York City Department for the Aging (DFTA or the Department) is the lead Mayoral agency addressing public policy and service issues for the aging. It is also the largest agency in the federal network of Area Agencies on Aging (AAA) in the United States. Established to represent and address the needs of elderly residents of New York City, the Department administers and promotes the development and provision of accessible services for older persons and serves as an advocate on legislative and policy issues. DFTA partners with hundreds of community-based organizations to provide a range of services to older throughout the City. In Fiscal Year 2020, DFTA served over 240,000 older New York City residents through its in-house programs and contracted providers.

### Services Offered by the Agency

#### DFTA-Funded Core Community Services

- **Older Adult Centers:** DFTA currently funds over 240 older adult centers throughout the five boroughs. They provide congregate meals and an environment where older adults can participate in a variety of recreational, health promotional and cultural activities, as well as receive information on and assistance with benefits.
- **Case Management:** Case management services help older persons with functional impairments gain access to appropriate services, benefits and entitlements needed to age safely at home and maintain their quality of life. Case Management is the gatekeeper for

DFTA funded in-home services such as home delivered meals, home care, friendly visiting, and the Bill Payer program.

- **Home Delivered Meals (HDM):** The Home Delivered Meals program provides meals each weekday to hungry and homebound older adults, and its public/private partnership with Citymeals on Wheels supports weekend, holiday, and emergency meals for these recipients. All home delivered meals meet prescribed dietary guidelines.
- **Home care:** The Home Care program is designed for low-income seniors 60 years of age and older who have unmet needs in activities of daily living and do not qualify for Medicaid or other ongoing insurance-funded home care. The goal of this program is to maintain seniors safely at home and prevent or delay the placement of frail elderly individuals into more expensive Medicaid-funded nursing homes.
- **Transportation:** The Department provides transportation for older adults through contracted non-profit organizations. These providers transport frail older New Yorkers who have no access to, or cannot use public transportation, for the purpose of attending senior centers and essential medical and social service appointments.
- **Caregiver Services:** The Caregiver program supports caregivers of older New Yorkers by providing direct referrals and support through community-based providers. These providers support caregivers by providing information on long term care topics and resources, assisting with accessing benefits and entitlements, offering individual counseling, support groups, and care-related training, linking caregivers with in-home, congregate, and overnight respite care, and offering supplemental support services.
- **Naturally Occurring Retirement Communities (NORCs):** DFTA oversees the City-funded Naturally Occurring Retirement Community Supportive Service Programs (NORC SSPs), which provides social work services, assistance with health care management, wellness activities, and other social and educational programs. There are currently 28 NORC SSP contracts funded by DFTA.
- **Elder Abuse Prevention and Intervention Services:** DFTA contracts with five community-based elder abuse organizations, one in each borough, to provide: direct services to victims of elder abuse; prevention activities that include trainings and outreach; long-term case management services to clients, many of whom present highly complex cases; and assistance to victims of elder abuse by helping them secure orders of protection, providing long-term counseling, accompanying victims to court, examining powers of attorney and other legal documents, working with police to place victims on high-propensity lists, and working closely with District Attorneys to aid in the prosecution of cases.
- **Social Adult Day Services (SADS):** Social Adult Day is a supervised program for cognitively impaired and/or physically frail older adults, with program components designed to reduce isolation and maximize individual capabilities through socialization, structured activities, and nutritious meals. These services, combined with transportation and access to case managers, provide respite to caregivers of these participants. DFTA oversees nine discretionary Social Adult Day Service programs.

- **Friendly Visiting:** Made possible by ThriveNYC, the Friendly Visiting program matches seniors with dedicated volunteers who commit to making weekly home visits to seniors in their own homes. Friendly Visiting often helps reduce loneliness and feelings of isolation and supports seniors in maintaining community connections and re-engaging in social activities.
- **NY Connects:** NY Connects is a statewide ‘no wrong door’ program of information and referral for individuals across the lifespan in need of long-term services and supports. NY Connects is unique in its charge to assist older adults, persons of all ages with disabilities, and individuals with mental health and substance abuse issues. The goal of the program is to ensure that individuals receive assistance in such a way that they are seamlessly connected with services that help them with often multifaceted, complex situations. NY Connects oversees five contracted borough-based community organizations throughout New York City.

#### **DFTA Direct Service Programs**

- **Aging Connect:** In February 2020 DFTA launched Aging Connect, a contact center that connects older New Yorkers, caregivers, and professionals to age-inclusive programs, resources, and opportunities. In close partnership with NY Connects and 311, Aging Connect aims to eliminate confusion and provide information and direct referrals to services. Aging Connect’s multi-lingual Aging Specialists are trained to connect callers to direct services provided by DFTA providers, community partners and city agencies.
- **Assigned Counsel Project:** The Assigned counsel Project (ACP) is a joint collaborative effort between the NYC Department for the Aging, NYC Human Resources Administration (HRA), Office of the Criminal Justice (OCJ) and the New York State Civil Court Access to Justice Program. The goal of the program is to prevent evictions of persons over the age 60. Potential clients for the program are older adults who are at risk of being evicted from their homes, and who have an active case on the New York City Housing Court calendar.
- **Bill Payer Program:** The Bill Payer Program provides one-on-one free assistance to older persons who need help with checkbook maintenance and bill paying. The program works to assist low-income seniors in paying their bills on time, while protecting them from financial exploitation. It helps financially vulnerable seniors remain in the community with the assurance that their monthly financial obligations have been met.
- **Elderly Crime Victims Resource Center:** The Elderly Crime Victims Resource Center provides direct services to crime and elder abuse victims, and training to groups that work with older adults on how to identify signs and provide intervention. The ECVRC and its community partners – including the Mayor’s Office to Combat Domestic Violence and the Family Justice Centers of Brooklyn, Queens, Manhattan, Bronx, and Staten Island – provide crisis intervention, counseling, advocacy, information and assistance, limited emergency financial assistance, and legal services referrals.
- **Foster Grandparent Program (FGP):** The Foster Grandparent Program is a federally funded senior volunteer program sponsored by DFTA, whose primary focus is literacy support and

mentoring to children with special and exceptional needs. Low-income older adults are placed in a variety of venues, such as schools, hospitals, family courts, Head Start programs and day care centers. Foster Grandparents assist teachers, medical staff, and social workers in engaging children in literacy activities, as well as in providing nurturing and care for pediatric patients.

- **Grandparent Resource Center (GRC):** The Grandparent Resource Center provides supportive caregiver services to older adults raising their grandchildren. As a member of the Mayor’s Action Plan (MAP) for Neighborhood Safety in 15 NYCHA developments, the GRC collaborates with other City agencies and community leaders to seek and engage the grandparents/elderly caregivers of children under 18 years old who reside within designated NYCHA developments. In addition, GRC staff provides intergenerational programming, food-insecurity resources, assistance with elder abuse and other senior issues at the MAP sites.
- **Health Insurance Information Counseling and Assistance (HIICAP):** The Health Insurance Information Counseling and Assistance Program (HIICAP) helps seniors navigate the complexities of Medicare and Medicaid. HIICAP publishes “A Complete Guide to Health Insurance Coverage for Older New Yorkers” annually. The book is translated into Spanish, Chinese and Russian, and is available in print and online. HIICAP also oversees the Fully Integrated Duals Advantage program (FIDA), a demonstration program jointly administered by the federal Centers for Medicare & Medicaid Services (CMS) and the New York State Department of Health (NYSDOH). It is designed to integrate care for New Yorkers who have both Medicare and Medicaid.
- **Nutrition Counseling:** DFTA’s Nutrition Unit includes dietitians and nutritionists who serve as experts for the Department’s community partners and for seniors living in the community who attend congregate meal programs or receive home delivered meals. They ensure that seniors receive nutritious meals that meet all city, state, and federal guidelines. They also provide extensive technical assistance on meal planning, recipe development, food safety, and City Agency Food Standards.
- **Senior Community Service Employment Program (SCSEP):** The Senior Employment Unit operates the Title V Senior Community Service Employment Program (SCSEP), which provides training and employment opportunities for adults 55 and older, including job search skills workshops, career advisement, job fairs, and computer technology and customer service training. The SCSEP program provides ongoing support to the participants upon finding employment, such as retention and career advancement support and non-related support through partnerships with other city agencies.

For more information about DFTA’s services, please visit our website at: [www.nyc.gov/aging](http://www.nyc.gov/aging).

### III. DFTA Language Access Policy and Goal

In keeping with the Department's mission to serve all older New Yorkers, DFTA is committed to ensuring that limited English is not an obstacle for older individuals. It is the policy of DFTA to ensure that

individuals with Limited English Proficiency have equal and meaningful access to all its services. Individuals are of Limited English Proficiency (LEP) when they have limited ability to speak, read, write, or understand English.

DFTA's language access goal is to facilitate aging services access and utilization by older LEP individuals. The goal will be met through the following objectives:

- Informing staff and providers about local, state, and federal language access mandates, including Local Law 30;
- Ensuring staff, providers and the public are aware of and knowledgeable about DFTA's Language Access Policy;
- Providing front line and outreach staff with training on the provision of language access services;
- Requiring providers contracted with the Department to have plans and policies in place to address the needs of LEP individuals as per the Department's General Standards of Operation;
- Monitoring contract agencies' compliance with language access requirements;
- Translating commonly distributed documents in the 10 designated citywide languages, and any additional languages spoken among the top ten spoken by older New Yorkers;
- Ensuring that other documents and announcements, identified by DFTA programmatic units, are translated into the top 10 languages of Older New Yorkers and/or the City's 10 designated citywide languages.

#### IV. Agency Language Access Accomplishments and Progress on Goals from the Previous LAIP

Language Access Goals	Update
Identify a Language Access Coordinator.	DFTA appointed a Language Access Coordinator in FY 2019.
Develop a tracking system to track complaints and document language translation services provided.	The Correspondence Tracking System (CTS), which officially launched in CY2019, allows tracking of complaints, including any language access related complaints.
Develop a complaint form and post on the internet.	The Department has updated the website with an option for the public to register complaints, concerns, and requests for language access services.
Provide Plain Language Training for staff	Several staff, including the Language Access coordinator, have completed Plain Language training courses.
Develop a protocol for staff requests for formal translation of DFTA documents.	The Language Access Coordinator has been established as the point person for facilitating formal translation of documents.
Incorporate Language Access into the Continuity of Operations Plan (COOP)	DFTA's language access plan is currently included in agency's Continuity of Operations Plan (COOP).
Ensure that multilingual staffers are tapped to table at disaster service assistance centers and multilingual materials provided.	DFTA will seek bilingual volunteers among staff to table at disaster assistance centers.
Develop a system to monitor whether language services are being provided by contracted providers.	Language access compliance is included in the monitoring tool that is used to assess the performance of contracted providers.
Ensure that all programs and in-house Units have Language Cards posted.	Various multilingual signages have been posted on all floors throughout the agency.
Review the Clarity of Materials to be Translated.	Some documents are reviewed for Plain Language and clarity prior to publication.
Identify and Prioritize the Most Commonly Distributed Documents for translation in the ten designated citywide languages.	Various documents have been identified for translation, including the agency brochure which was updated in FY 2020.
Convene the first bi-annual multi-Bureau Language Access Meetings.	The LAC will coordinate workgroups to implement the Plan.

## V. LEP Population Assessment (Application of the US Department of Justice Four Factor Analysis)

### Factor 1: The number and proportion of LEP older individuals in New York City

Top ten languages among older New Yorkers who speak English “less than very well”:

Languages other than English spoken at home	# 60+	% 60+	# 60+ LEP	% 60+ LEP
Spanish	367,899	20.90%	235,875	13.40%
Chinese	131,662	7.50%	119,993	6.80%
Russian	67,010	3.80%	58,585	3.30%
Korean	17,837	1.00%	16,370	0.90%
Italian	28,205	1.60%	15,726	0.90%
Haitian	28,257	1.60%	13,721	0.80%
Polish	14,549	0.80%	11,846	0.70%
Bengali	14,620	0.80%	10,340	0.60%
Greek	14,456	0.80%	8,525	0.50%
Arabic	9,818	0.60%	5,976	0.30%
<b>Total Population (60+)</b>	<b>1,759,783</b>	<b>-</b>	<b>560,457</b>	<b>31.80%</b>

*Source: ACS 1-Year Estimates-Public Use Microdata Sample 2019*

### The Primary Languages of DFTA's Clients Served During Fiscal 2020

During Fiscal 2020, DFTA served over 240,000 older New Yorkers and their caregivers; of those:

- 70,720 or 29% speak a primary language other than English; and,
- 31,215 or 44% cannot speak, read, or understand English.

The language breakdown of all DFTA’s clients who cannot speak, read, or understand English (LEP) is as follows:

Language	Number of Clients	Percentage of Clients
Spanish	15,697	50%
Chinese (includes Cantonese, Mandarin, and other dialects)	8,781	28%
Russian	4,129	13%
Korean	1,152	4%
Polish	537	2%
Italian	172	1%
Greek	184	1%
Arabic	56	0.20%

Language	Number of Clients	Percentage of Clients
Albanian	42	0.10%
Ukrainian	36	0.10%
Portuguese	26	0.10%
Haitian Creole	29	0.10%
French Creole	26	0.10%
Romanian	20	0.10%
Japanese	20	0.10%
Urdu	21	0.10%
Creole English	20	0.10%
Bengali Bangla	19	0.10%
Hindi	16	0.10%
Other	232	1%

Source: Senior Tracking and Reporting System (STARS)

**Factor 2: The frequency with which LEP individuals come into contact with the agency.**

The table below shows the number and of, and frequency with which LEP individuals came into contact with DFTA – funded core programs during FY2020.

Limited English Proficiency Clients						
	LEP		Non-LEP		Total	
	Clients	Percent	Clients	Percent	Clients	Percent
Contact with DFTA Funded programs:						
More than 10 times:	19,167	50%	91,292	45%	110,459	46%
Less than 10 times:	18,897	50%	112,519	55%	131,416	54%
Total	38,064	100%	203,811	100%	241,875	100%
<b>Average Contacts</b>						
	56 times		44 times		46 times	

Source: Senior Tracking and Reporting System (STARS)

In FY2020 DFTA provided more than 1,500 over the phone interpretation in more than 30 languages through its Language Line Solutions. The table below shows the languages for which translation was provided and the number of calls for each.

Language	Number of Calls
Spanish	805
Chinese (includes Mandarin, Cantonese, and Toishanese, and Shanghainese)	319
Russian	199
Korean	31
Greek	26

Language	Number of Calls
Bengali	25
Polish	17
Hindi	14
Arabic	12
Italian	8
Haitian Creole	8
Farsi	7
Urdu	6
Japanese	5
Albanian	4
Thai	3
French	3
Tagalog	2
Punjabi	2
Other ( <i>includes Portuguese, Hungarian, Sudanese Arabic, Romanian, Yiddish, Vietnamese, Akan, Fuzhou, and Serbian</i> )	10

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

The services DFTA provides help older adults remain safe and secure, and age well in their communities. The lack of, or delay in access to, translation or interpretation services can have serious implications for LEP older adults and their caregivers trying to access these services. It has been particularly critical during the pandemic to ensure that prompt, accurate information is provided to older adults in the language they speak.

**Factor 4: Resources available to the agency and the costs of providing the various language services.**

DFTA’s current resources include Language Line Solutions, which provides interpretation services in over 240 languages, and DFTA’s multilingual staff who can competently assist LEP individuals in various languages other than English. In FY20, DFTA spent \$36,868.69 on translation and interpretation services. Based on the analysis above, DFTA will ensure that its direct public services are provided in Italian and Greek, which are among the top ten languages spoken by older New Yorkers, but not included in the citywide designated languages. DFTA will also provide any additional languages based on any targeting efforts.

**VI. Provision of Language Access Services**

**Translation Services**

DFTA uses several vendors for translations, including Human Touch and Continental Translation. Bilingual staff sometimes translates short documents and messages. The LAC works with staff to facilitate translation requests and arranges for secondary review of translated documents. Should the translations be less than accurate, they are returned to the vendor to be corrected. Vendors are assessed, when possible, on the quality of previous work done. The LAC also works with program staff



as well as the Press and Public information Office to identify the most commonly distributed documents and have them translated. Staff are made aware of the agency's translation resources and how to access them through trainings and information provided by their leadership.

**How the agency identifies, prioritizes, and translates the “most commonly distributed” (MCD) documents and ensures that new materials that are created are translated, as necessary.**

Some criteria used to identify MCDs include whether they are regularly used for outreach to the public, their shelf life (evergreen documents), and how often they are requested by the public. Materials that contain important and necessary information, like COVID guidance, are prioritized for translation. Some translated materials were distributed at events like the annual public hearings, while others like ad campaigns were distributed through ethnic media outlets, on the radio, bus shelters, through public service announcements, and Link NYC Kiosks. Staff are instructed to follow the protocol for the provision of Language Access Services outlined in the LAIP on the agency's internet. The Plan will also be placed on Geras, DFTA's internal staff website.

**Interpretation Services**

DFTA utilizes Language Line Solutions, which provides interpretation in over 240 languages for telephonic interpretation. Interpretation services are provided to any LEP individual who contacts the agency by phone or in person. All direct services staff can access Language Line. For in-person contacts, staff are required to use language identification cards to identify an individual's language. DFTA has several staff who are proficient in a range of different languages. The agency utilizes these bilingual staff to communicate with clients when the information can be easily and quickly be conveyed to the client in his or her primary language. DFTA modified the data field for entering client's special communication needs in its client tracking database, which is utilized by internal programs and contracted providers, to make it a required field. This makes it mandatory for users to see or capture whether clients are LEP, as well as the language they speak, and communicate with them in their primary language or utilize Language Line. DFTA's in-house program staff uses interpretation services to provide LEP Older New Yorkers with a wide range of services. For example, Aging Specialists in DFTA's Aging Connect contact center regularly utilize Language Line to provide LEP callers with information on age-inclusive programs, resources, and opportunities. Staff are required to provide an interpreter if the client requests one, regardless of whether a bilingual staff is available. Meka Nurse, DFTA's Senior Director of Aging Connect, manages Language Line, and provides access to staff who need to utilize the service.

**Language Access in Agency Communication**

Outreach staff will ensure that materials are translated in the predominant languages of the communities they plan to engage at outreach and public information events. The agency also aims to engage LEP communities by providing notices and running campaigns in ethnic media outlets, on the radio, on bus shelters, etc.

**Plain language**

Several key staff responsible for developing documents for dissemination to the public have completed Plain Language training. Documents targeted for translation are written in plain language to ensure that the information can easily be understood by individuals with a range of literacy levels. Documents are reviewed for readability and clarity and edited where necessary prior to translation and publication.

## **Policies and Procedures**

All DFTA staff interacting with potential clients and/or service information seekers are required to take the following steps in providing service to walk-in individuals:

- When a walk-in customer appears to be LEP, staff must attempt to verbally ascertain the primary language spoken by the customer.
- If verbal communication is unsuccessful, staff must use a Language Identification Card to facilitate communication. Language Identification Cards are available in all reception areas and units.
- When individuals visiting DFTA's offices need language services, they are to be assigned to a bilingual staff person who speaks his/her language if available.
- If an appropriate bilingual worker is not immediately available, Language Line Solutions should be accessed.
- Callers to direct service units or individuals contacted by phone will be asked their preferred language for communication if they are deemed LEP, and interpretation services will be provided.

Primary language is tracked in DFTA's client tracking system (STARS), as well as in DFTA's Correspondence Tracking System (CTS). STARS captures primary language as well as individuals' ability to speak, read, or write English.

## **Notification of Free Interpretation Signage**

Multilingual signage about the right to, and availability of free language services are posted on each floor throughout the agency. DFTA's contracted providers are also required to post signage at their location about free language services and are assessed on their compliance with this requirement in their annual evaluations. "Point to your Language" and "I Speak Cards" are also available to assist LEP individuals with identifying their language.

## **Languages beyond the Top Ten**

DFTA is committed to making its services available to all older adults regardless of the language they speak. Staff are required to ensure that LEP individuals receive timely service in their primary language. DFTA will translate documents in the two additional languages (Italian and Greek) that are among the top ten languages spoken by LEP older New Yorkers, and any additional languages that are spoken by the predominant members of target communities. DFTA utilizes Language Line Solutions to provide over the phone interpretation to individuals who speak languages beyond the 12 languages.

## **Addressing Language Access Needs in the Agency's Emergency Preparedness and Response**

DFTA's Office of Emergency Preparedness and Response (OEPR) coordinates public and internal messaging for hazards and emergencies. The agency's Language Access Plan is included in the Continuity of Operations Plan (COOP) and in the Agency's Emergency Plan. Clients' primary language and special communications needs (ability to speak, read, or write English) are captured on the Emergency Preparedness form in each client's profile in DFTA's client tracking system (STARS). DFTA will continue to communicate information about hazards and emergencies to clients in their primary language, either through direct phone calls or through robocalls. During the pandemic, DFTA sent out robocalls in several languages with information about meal delivery and vaccination. DFTA's contracted providers are required to have a written emergency plan, which the agency will monitor to ensure that it includes language access. DFTA will also maintain a list of bilingual staff who opt to volunteer in an

emergency. The LAC will work with the emergency preparedness liaison to facilitate translation of materials and any other language access activities, as appropriate.

## **VII. Training**

DFTA's Staff Development Unit will conduct trainings for frontline staff and managers on language access laws, policies, and procedures. Trainings will be offered quarterly to accommodate new staff, as well as any current staff who would like a refresher. Staff who complete the training will receive a certificate of completion. The Staff Development Unit will maintain a record of all staff who have been trained.

Staff from following areas will be trained at least annually:

- Aging Connect
- HIICAP
- Senior Employment
- Foster Grandparent
- Grandparent Resource Center
- Bill Payer
- Elderly Crime Victims Resource Center
- Nutrition Counseling
- Government Affairs Outreach
- Press and Public Information
- Other (this includes other staff identified by the leadership)

Training topics will include the following:

- Language Access legal mandates
- Working with interpreters
- When to use bilingual staff and when to use language services providers
- When and how to use telephonic interpretation
- When and how to use in-person interpretation
- When and how to request translation services
- How to identify the primary language of a person with LEP
- How to track the individual's language
- How to track whether and how language services are provided to the individual
- How to provide customer service to individuals with LEP

Additional, relevant trainings will be provided to staff as resources allow.

## **VIII. Record Keeping and Evaluation**

DFTA will continue to track the languages spoken by clients in the Senior Tracking and Reporting System (STARS) and with individuals seeking information, assistance, and or making a complaint in the Correspondence Tracking System (CTS). The CTS is an internal database that captures correspondence submitted through DFTA's website, 311 online, as well from the Mayor's Office. The Correspondence Manager will handle all language access correspondence that come into the CTS, and the LAC will be able to develop reports as needed. STARS is utilized by DFTA's more than 400 contracted providers, as

well as in-house direct service programs to gather and analyze key information about its clients and programs. Data from these systems, as well as demographic analysis will help DFTA identify, target and more effectively and equitably serve LEP clients. DFTA will develop key metrics to determine whether its services are sufficiently and effectively meeting the needs of LEP older adults. Indicators will include the unduplicated number of LEP individuals served; the time it takes to respond to language access complaints; and the number of documents translated and disseminated. DFTA will also propose the addition of Client Primary Language as an indicator to its EO45 data. Additionally, the LAC will keep abreast of demographic changes to determine if there are any emerging LEP populations and ensure they have access to DFTA's services. Satisfaction surveys will include feedback on language access service. All contracted providers are required to have plans and policies in place to address the needs of LEP individuals and compliance is monitored as a part of their assessment. The LAC will monitor the Plan for compliance with LL30 and apprise the leadership of any non-compliance, as well as make recommendations for strengthening the agency's language access service delivery.

## **IX. Resource Analysis and Planning**

Implementation of the Plan, coordination, and management of translation services, and ensuring compliance with Local Law 30 will be provided by the following DFTA staff:

The Senior Director of the Office of Management Analysis and Planning (OMAP), and the Director of Planning, Policy and Analysis (PPAU) will supervise the Language Access Coordinator whose responsibilities include:

- Updating the annual Language Access Plan and the Language Access Implementation Plan (LAIP)
- Monitoring implementation of the LAIP
- Liaising with the Mayor's Office of Immigrant Affairs
- Coordinating language access workgroups
- Facilitating translation requests
- Preparing reports on language access

Director of Press and Public Information:

- Identifying commonly distributed documents.
- Ensuring that DFTA's public announcements and key publications are accessible to LEP individuals.

Director of Staff Development:

- Develop and conduct language access and cultural competency trainings for direct service staff, supervisors, and program officers who are responsible for monitoring contracted providers.

DFTA General Counsel:

- Ensure legal compliance and provide legal guidance when necessary.

The agency has a Purchase Order for Language Line Solutions.

DFTA outlines the provision of language access services as a requirement in its Requests for Proposals and in contracts with service providers. Language access requirements is also written in Standards of Operations.

As per the Department's General Standards of Operation (Standard 2 Compliance 2.1):

**Compliance 2.1. The program is linguistically and culturally competent.**

- *The program has a language access plan that includes these provisions:*
  - *The program will provide on-demand language assistance free of charge to persons with limited English proficiency (LEP). At minimum, the program will have a telephonic interpretation service contract or similar community arrangement with a language interpretation services provider to assist LEP individuals.*
  - *The program will inform persons with limited English proficiency of the availability of free language assistance at its location. Notice will be in writing designed to be understood by LEP individuals.*
  - *The program will train staff that have contact with the public in the timely and appropriate use of these and other language services.*

## **X. Outreach and Public Awareness**

The department will keep the updated LAIP posted on its website where all stakeholders (internal staff, providers, clients, public, etc.) can access it. Information about the availability of free language assistance will be included in outreach materials and communication to the public. In notices about its public hearings, DFTA will include information about how to request interpretation or translation of materials in their primary language.

## **XI. Language Access Complaints**

Members of the public can submit language access complaints, questions, and requests to the agency by contacting 311 by phone or online or through DFTA's website at:

<https://www1.nyc.gov/site/dfta/about/email-the-commissioner.page>. The Correspondence Manager will be responsible for documenting all language access complaints and ensuring that complaints are addressed promptly and within the Service Level Agreement timeframe.

The public can also contact the Language Access Coordinator directly with any questions at <https://www1.nyc.gov/site/dfta/about/language-access-plan.page>.

## **XII. Implementation Plan Logistics**

The Language Access Coordinator will work with managers, program staff and the Staff Development Unit to implement the Plan by:

- Ensuring any new LL30 mandates, guidance, or other information are conveyed to leadership and other appropriate staff;
- Participating in trainings conducted by the Staff Development Unit as needed; and
- Coordinating language access workgroups

<b>Language Access Goals</b>	<b>Milestones</b>	<b>Responsible Staff</b>	<b>Deadline</b>
Include Language Access data in Executive Order 45 reporting.	Language Access indicators are added to reporting metrics.	Chief Diversity Officer and EO45 representative.	March 31, 2021
Conduct language access trainings for all in-house frontline staff and managers.	All frontline managers and staff are trained. New staff will be trained, and continuing staff will receive a refresher annually.	HR's Staff Development Unit.	June 30, 2021
Coordinate language access workgroups.	Staff are assigned responsibility for assisting with implementation of the LAIP.	Language Access Coordinator (LAC).	June 30, 2021
Translate most commonly distributed documents.	Commonly distributed documents are identified, prioritized, and translated.	LAC, program staff, and Office of Press and Public Information.	September 30, 2021
Develop a Plain Language Review process.	Plain Language review workgroup is developed.	Language Access Coordinator.	September 30, 2021
Identify ways to improve the accessibility of DFTA's website beyond using Google Translate.	Multilingual links that connect users to pages with content are on the homepage.	Press and Public Information.	September 30, 2021
Post most commonly distributed documents in the 10 designated citywide languages on the agency's website.	Most commonly distributed documents are on the agency's website.	Press and Public Information.	September 30, 2021
Provide in-person interpretation at events based on the population being served.	In-person interpretation service is provided at public hearings and other large-scale community events.	Event organizer.	September 30, 2021

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Language Access Implementation Plan  
May 2021



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Lisa Lewis, Director of Customer Service  
**Language Access Team**  
**Department of Buildings**

Melanie E. La Rocca  
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## **Introduction**

Language access is critical for New York City's diverse communities. The city is home to approximately 3.4 million immigrants, and almost half of all New Yorkers speak a language other than English at home. Approximately a quarter of New York City's population, or 1.8 million New Yorkers, identify themselves as Limited English Proficient (LEP).

## **Executive Order and Local Law**

Executive Order 120 of 2008 established a uniform policy and standards for translation and interpretation services for City agencies that have direct interaction with New Yorkers. It required that each City agency designate a Language Access Coordinator, develop a language access implementation plan and provide interpretation services for the top six languages spoken in New York City.

Local Law 30 of 2017 strengthens language access services for people with limited English skills and expands the list of designated citywide languages to 10. It requires City agencies that provide direct services to the public to translate their most commonly distributed documents into the top 10 citywide languages. It also requires agencies to provide telephonic interpretation in at least 100 languages and to develop a language access implementation plan to be posted on an agency's website.

### **I. Role and Responsibilities of the Language Access Coordinator**

The Language Access Coordinator at the Department of Buildings is Lisa Lewis, Director of Customer Service. The Language Access Coordinator has the following responsibilities:

- Works with agency stakeholders to creating a language access plan, monitor its implementation and maintain current and relevant policies and procedures
- Collects and evaluates customer data and program effectiveness
- Communicates with the Mayor's Office of Immigrant Affairs and the Mayor's Office of Operations on language access plan implementation strategy
- Develops and distributes materials to inform staff and customers of language access programs
- Convenes, supports, and maintains up-to-date contact information for staff assisting with the language access program
- Coordinates and assesses training to ensure staff is prepared to provide meaningful language access to LEP customers
- Oversees citywide contracts related to language access services (interpreting, translation, and cultural competency) to ensure quality assurance and cost benefits

### **II. Agency Mission and Background**

The New York City Department of Buildings (The Department) ensures the safe and lawful use of more than 900,000 buildings and properties by enforcing the Construction Code, Zoning Resolution, and other applicable laws. Each year it reviews construction plans, issues new and renewed permits, performs inspections, and issues licenses, registrations, and certificates. It facilitates construction by continually streamlining the permit application process and delivers services with integrity and professionalism.



DOB architects and engineers evaluate construction plans, verifying they meet Construction Code and zoning requirements. Inspectors monitor job sites to enforce building code and zoning regulations, and issue violations when appropriate. The Department issues a Certificate of Occupancy (C of O), which documents the legal use and/or occupancy of a building, when the required sign-offs are obtained. Administrative and support staff are dedicated to meeting the needs of the public by providing excellent customer service and developing streamlined operations that are effective and ensure public safety.

**Permits**

- Alterations – Room additions, conversions and renovations
- Construction Equipment - Fences, sheds, chutes, scaffolds, etc.
- Curb Cuts
- Demolition & Removal
- Electrical Systems
- Elevators
- Fire Suppression Systems
- Foundation/Earthwork
- Fuel Burning/Storage
- Mechanical and HVAC (Heating, Ventilating and Air Conditioning Systems)
- New Building Construction
- Places of Assembly
- Plumbing Systems
- Residential Work – Decks/porches, garages, fences, fireplaces, pools, water heaters, etc.
- Signs
- Sprinklers
- Standpipe Systems
- Subdivisions

**Licenses (issued and renewed)**

- Master Plumbers
- Master Fire Suppression Piping Contractors (Class A, B and C)
- Welders (Classes 1-4)
- Engineers (Stationary and Portable)
- Hoisting Machine Operators (Class A and B)
- Hoisting Machine Operators (Class C)
- Master Sign Hangers
- Special Sign Hangers
- Master Riggers
- Special Riggers
- Elevator Inspectors
- Elevator Agency Directors
- Oil Burning Equipment Installers (Class A & B)
- Climber or Tower Crane Riggers
- Site Safety Coordinators
- Site Safety Managers
- Cement Testing Laboratories
- Master Electricians
- Special Electricians

**Registrations**

- Construction Superintendents
- Filing Representatives
- General Contractors

**III. Agency's Language Access Policy and Goals**

**A. Language Access Policy**

The Department provides both interpretation and translation services to ensure LEP individuals have access to the information and services they need. This includes notifying customers of their rights to free language services and enforcing the provision of these services through staff training and outreach.

**B. Agency Language Access Goals**

The Department of Buildings aims to provide meaningful access to services and materials by updating and continuing to implement an agency-specific language access plan for LEP applicants, homeowners, business owners, tenants and other customers. This includes:

- Strengthening internal and external training and outreach initiatives.
- Translating documents that affect public and worker safety
- Implementing plain language guidelines and providing cultural sensitivity resources.

**IV. Agency Language Access accomplishments and progress on goals from previous LAIP**

Goal	Update
Confirm a language access liaison for each borough office and central unit to monitor language access services and serve as a resource for unit staff.	<b>Completed</b>
Train all staff on Local Law 30	<b>Completed</b>
Implement plain language guidelines and provide cultural sensitivity resources	<b>Completed</b>
Produce annual Language Access Report	<b>Completed</b>
Update Language Access Plan	<b>Completed</b>

**V. Limited English Proficiency (LEP) Population Assessment**

As guided by Local Law 30, the Department of Buildings applies the “four factor analysis” as outlined by the U.S. Department of Justice to assess obligations for language access as the basis for its Language Access Implementation Plan.

The Department of Buildings utilizes the top ten designated citywide languages to provide services to LEP customers. We vary the delivery of these services based upon the frequency of contact or anticipated contact of LEP customers. Reasonable steps are taken to accomplish our goals but at the point at which costs approach or exceed the benefits, alternative methods of delivery of language services will be evaluated and appropriate changes made.

**A. Execution of the U.S. Department of Justice's Four-Factor Analysis**

- **Factor 1: The number or proportion of LEP persons in the eligible service population**  
 The Department determined the proportion of LEP persons identified based on data obtained from 311 and a survey of our customers. Data is also taken from the [American Community Survey](#) made available by the NYC Department of Planning. Our 2020 assessment is that less than one percent of customers who visit or contact our borough and central offices are persons who are Limited English Proficient.

The Department of Buildings applies the analysis undertaken by the Mayor’s Office of Immigrant Affairs under Local Law 30 to determine the top ten citywide languages based on data from the Census. Based on this analysis, the ten citywide languages for FY18 - FY21 are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish.

- Factor 2: The frequency with which LEP individuals come into contact with the agency**  
 The Department tracks the number of LEP customers we encounter by requiring units to provide a monthly report of the customers who receive services from staff volunteers. We also monitor the monthly billing reports from the language interpretation vendor. Below is data from 2020 time period:

Language	Vendor	Volunteer
Cantonese	3	0
Mandarin	6	0
Spanish	20	33
Russian	1	0
Total	30	33

In 2020, in-person customer service was limited due to pandemic safety measures. Interaction with LEP customers was based on telephone customer service.

- Factor 3: The importance of the benefit, service, information, or encounter to the LEP person**  
 It is the Department's intent to provide meaningful access to all customers and eligible individuals with a focus on actions that directly impact public safety including issuance of violations, vacate orders and stop work orders, legal actions, and life and safety notices.
- Factor 4: The resources available to the agency and the costs of providing language services**  
 The Department budgets for and utilizes the current vendors contracted by the NYC Department of Information Technology and Telecommunications: Voiance, Inc. for telephone interpretation and Geneva Worldwide for document translation services. The Department also makes use of the citywide and internal volunteer language bank and internal volunteers.

**Evaluation of language access needs of agency’s service population**

Based on our assessment of the above factors, a small number of Department of Buildings’ customers are Limited English Proficient.

While speakers of the ten Designated Citywide Languages under Local Law 30 account for more than 85% of foreign-born New York City residents with LEP, the Department of Buildings aims to provide language interpretation services to customers who need other languages receive services.

In order to ensure that Department of Buildings' Team members can effectively engage with these hard-to-reach communities that it has identified, MOIA provides interpretation in and translates materials and collaborates with the External Affairs and Inspection Units.

## **VI. Provision of Language Access Services**

The Department of Buildings provides language access services in line with the citywide designated languages through staffing and contracts. We currently provide in-person interpretation with onsite volunteers, use Language Line Services, Inc. for telephone interpretation and Geneva Worldwide for document translation. Throughout our borough offices, we have posted multilingual signage in high traffic locations informing customers of the availability of free interpretation services. The Department identifies and translates the most commonly distributed or requested materials by our customers that provide information related to public and worker safety, including emergency preparedness and response. We review and revise documents following the plain language guidelines prior to translation.

### **A. Translation Services**

- **Essential Documents**

The OATH Summons/Violation and instructions were updated to meet plain language guidelines and are available in the designated citywide languages on the Department website. The below documents are in the process of being evaluated for plain language and translation:

  - AEU-2: Certificate of Correction
  - LS-4: No Access Notice
  - Stop Work Order
  - Vacate Order
- **Plain Language Guidelines and Standards**

A plain language working group led by the Assistant Commissioner of Strategic Policy & Industry Relations and including the Assistant Commissioner of Communications, Senior Advisor for Policy Engagement and Outreach, Chief Customer Officer, and Executive Director of the Administrative Enforcement Unit meets regularly to review documents before public distribution and translation.
- **Service Notices, Press Releases and Website Content**

The plain language working group also reviews notices, releases and the website to ensure accessibility and translation of this content as appropriate.
- **Ensure Quality of Translations**

The Department obtains translation services only from vendors who have a master contract with the City through an extensive RFP process. Vendors have internal proofreading and editing processes. When available, the Department's bilingual staff review translated documents for quality, accuracy and appropriateness of terminology. Based on customer feedback and standards, internal staff are evaluated for effectiveness in providing translation services. Internal outreach is also conducted to identify staff that is proficient in other languages.

## **B. Interpretation Services**

- Types of agency interactions that require translation services
  - In-person office visits
  - Telephone interactions
  - Inspector visits to properties
  - Materials provided on the website, at meetings and throughout our offices that communicate essential public and worker safety information and by request.
  
- Identify LEP individuals and their primary language  
Evaluating the ability of the customer to communicate effectively is essential in providing great service.
  - If customers do not verbally identify their primary language, staff are trained to ask for the language that they speak at home
  - If staff cannot identify a LEP customer's language by asking, they are instructed to use a Language Identification Card that is available at every service location and provided to all inspectors. The message underneath each language states: "Point to your language. An Interpreter will be called."
  - If the interaction is by telephone and the language cannot be identified, staff is instructed to call Voiance and seek assistance from the vendor to identify the language.
  
- Provide Interpretation Services  
The Department provides (spoken) interpretation in over 100 languages by our existing bilingual staff volunteers and paid vendor, Voiance. We continue to identify new volunteers that can provide interpretation services.
  
- Ensure Quality of Interpretation Services  
The Department uses interpreters who have demonstrated proficiency in both English and the intended language and received training that includes the skills and ethics of interpreting (e.g. issues of confidentiality), fundamental knowledge in both languages of any specialized terms or concepts and sensitivity to the client's culture.

## **C. Notification of Free Interpretation Services**

Information about the availability of interpreter services, which is free of charge, is prominently displayed in public areas of borough and central offices. Posters (11" x 17") or desktop displays (8 ½" x 11") are posted in public areas and counters to assist limited English speakers to self-identify their language. "I Speak" cards are also available at all service center windows. The signage is in the most frequently encountered primary languages of customers served by those facilities. In addition, the television monitors at each location include content that welcome customers in multiple languages.

## **D. Emergency Preparedness and Response**

The Department's Emergency Response Team has access to Voiance and received language access training along with all Department inspectors. A language access representative is on the Department's Continuity of Operations (COOP) planning committee to ensure that NYC Emergency Management protocols are followed.

## **VII. Training**

The Department's commitment to Local Law 30 requires trained and knowledgeable staff. The Customer Service Unit staff led by its Deputy Director conducts training sessions for frontline workers and managers. The sessions include the procedures and policies for assisting LEP customers in-person, by telephone and through written correspondence. It also includes tools and documents to guide employees in providing meaningful access to information and services to LEP customers.

This training is provided during the new hire orientation session for all employees in public contact positions or when a staff member's job description changes and requires contact with the public. In addition, information about language access is included in the annual customer service training self-study that is required of all staff. Inspections staff receive this training at an annual in-person customer service training. The Customer Service Unit maintains a list of all employees that receive LEP program-related training.

### **Updates to training content for Local Law 30**

New trainings will provide instructions on the proper use of the Language Identification Card and the Language Access Questions to assist in identifying a customer's primary language. Buildings staff will also be instructed to document the individual's native language and provide this information to the Customer Service unit for its data collection efforts.

### **New training topics**

The Mayor's Office of Operations is working with the Department of Citywide Administrative Services (DCAS) to incorporate language access, cultural sensitivity and disability communications into a re-developed training for front-line staff.

## **VIII. Record Keeping and Evaluation**

The Department maintains records pertaining to the requests for services in non-English languages and our capacity to serve these populations. We ensure the quality of our language access program by gathering feedback from the interactions LEP customers have with the Department. The Language Access Coordinator in each borough office and central unit provides a monthly report to the Director of Customer Service that includes interactions with LEP individuals during in-person visits at customer service windows and inspections, telephone calls, outreach involving the public, community and civic meetings, conferences and scheduled appointments.

To ensure the success of the language assistance program, the customer service unit monitors the LEP program periodically, but not less than annually, to assess the effectiveness and efficiency of the program. Review will include evaluating:

- Feedback from LEP clients
- Feedback from staff
- In-house reviews of the current communication needs of LEP clients
- Contact with community-based organizations that provide services to LEP clients

## **IX. Resource Analysis and Planning**

We will continue to utilize bilingual staff volunteers (25+) and citywide contracts to provide language services. We currently have contracts with two vendors Geneva Worldwide, Inc. (translation) and Voiance (interpretation) to provide training, foreign language interpretation and translation services to assist our LEP customers. The following cost-saving measures can also be explored:

- Expand outreach for volunteer language bank participants
- Centralize interpreter and translation services

## **X. Outreach and Public Awareness of Language Access Services**

The Department will utilize all forms of community affairs and marketing opportunities to enhance communication with members of the public regarding language access. In collaboration with the Department's External Affairs Team, the Customer Service Team will communicate with members of the public at meetings of community boards, civic associations, homeowners' groups, borough presidents and precinct councils. The language access coordinator will also work with communications staff to expand the translation of the most requested Department documents and engage in outreach with local ethnic press.

## **XI. Language Access Complaints**

The Department will investigate all LEP complaints submitted to and received from 311 and all other forms of communications (telephone, email and postal correspondence). The point of contact for complaints is the Language Access Coordinator who will be responsible for the intake of the complaint, tracking, resolving and reporting the complaint to MOIA. The following protocol will be implemented within ten (10) business days if a complaint is received:

- An investigation initiated by the Language Access Coordinator
- Follow up with the impacted customer to provide necessary services
- Retraining for the involved staff member(s)
- Follow up, if warranted, with written communication from the Commissioner

## **XII. Implementation Plan Logistics**

The Department's Language Access Coordinator is Lisa Lewis, Director of Customer Service who oversees the provision of services to Limited English Proficient individuals. This includes contracts with Voiance and Geneva Worldwide to provide telephone interpretation and document translation services. The Department also utilizes internal staff volunteers to serve LEP customers. All Department staff that interacts with the public receives annual training on language access policies and procedures.



Language access goal	Milestones	Responsible staff	Deadline
Recruit additional internal bilingual volunteers	Information on how to become a volunteer will be provided during New Hire Orientation, Inspector training and other channels to be identified.	Language Access Coordinator and Human Capital Director	In progress
Create a stand alone training on Local Law 30 for all staff	Annual Local Law 30 training	Language Access Coordinator and Deputy Director of Customer Service	In Progress
Implement plain language guidelines and provide cultural sensitivity resources	Conduct focus groups with front line staff to provide guidance and receive feedback about language access experiences	Chief Customer Officer and Language Access Coordinator	In Progress
Expand outreach and availability of language access services at public events	Include information on invitations that interpretation services can be provided if the Department is notified prior to the event	Language Access Coordinator and Communications staff	In Progress
Provide communications to the public in the designated citywide languages, including emergency notifications, alerts, public hearings, events and press releases	An initiative of the language access committee	Language Access Coordinator and Communications staff	In Progress
Review 28.401.6 to determine if the Department is required to provide language services to licensees and registrants	Provide documents in a format that is compatible with the translation tool on nyc.gov	Language Access Coordinator and Communication staff	In Progress

Department of Correction (DOC)  
Language Access Implementation Plan  
June 2021

**I. Agency Name and Agency Access Coordinator**

This Language Access Implementation Plan is submitted for The New York City Department of Correction by Diane Murray Ward, Language Access Coordinator and Liaison, Newspapers Contract Manager, Auditor / Associate Staff Analyst  
<https://www1.nyc.gov/site/doc>

**II. Agency Mission and Background**

The New York City Department of Correction (hereafter DOC) provides for the care and custody of people ordered held by the courts and awaiting trial or who are convicted and sentenced to one year or less of jail time. This includes parole violators and individuals awaiting transfer to state custody.

The DOC maintains facilities located on Rikers Island, hospital prison wards and borough-based facilities. Given the decreasing population of incarcerated individuals, we periodically close facilities in accordance with initiatives geared towards closing Rikers Island. At each step of these changes, we remain ever mindful of our commitment to assist all LEP (Limited English Proficient) persons in DOC custody.

Upon admission, incarcerated individuals are provided a handbook outlining behavioral expectations, counseling services, programming, and medical services. The DOC also provides families and friends of incarcerated individuals with guidelines for many engagements (e.g. bail, mail, etc.) via our multi-lingual website. The Most-Commonly Distributed Documents (hereafter MCD) are available in the ten designated languages per Mayoral Local Law 30 (hereafter LL30).

As stewards of public safety, the DOC strives to build safer communities by recognizing the humanity in everyone and creating a supportive environment that provides opportunities for positive change. To accomplish this, the DOC invests in staff through wellness and professional development and provides incarcerated individuals programs and rehabilitative services to those in our care.

**III. Agency Language Access Policy and Goals**

DOC policy requires commands to develop rosters identifying staff willing to volunteer their linguistic skills to foster LEP engagement. Current copies of these rosters are maintained in each facility. Additionally, each time the rosters are updated, a copy is forwarded to the Department's Central Operations Desk and Language Access Coordinator.

The diversity of DOC's staff allows us to provide in-house language coverage for most language needs, inclusive of the ten languages identified in LL30. Multilingual staff volunteers are generally recruited via fraternal organizations or are recommended by DOC Academy instructors when they are newly hired. DOC's Human Resources Division also now provides language recruitment information to new hires to encourage them to volunteer their skills in assisting with multilingual incarcerated individuals. In the rare instance that an identified language is not within our staff's skill set, we utilize the City's volunteer language bank (VLB) to assist in communicating with LEP individuals.

The DOC is also sensitive to the needs of incarcerated individuals who are deaf. The Disability Rights Unit within DOC's Health Affairs Unit has secured Video Relay Systems (hereafter VRS) in areas where incarcerated individuals receive support services. VRS can provide American Sign Language (hereafter ASL) as needed for LEP detainees.

Various Departmental procedures contain several key features which ensure compliance with LL30 as well as enhancing service delivery and security efficiency:

- 1) During the intake process, newly incarcerated individuals are asked to disclose their preferred language. This information is used to provide comprehensible services interactions and prevent miscommunications. The DOC has plans to extend this LEP identification capability as an alert to both DOC housing area staff and contracted medical providers.
- 2) The presence of "I Speak Posters," which are posters that provide an opportunity for literate LEP incarcerated individuals to point to their preferred language, are posted in conspicuous areas and remain legible, being replaced as needed. Additionally, uniform staff carry Memo Insert Cards, which also assist LEP incarcerated individuals to identify their preferred language. Officers continuously carry these cards so that they are always available for immediate use.
- 3) Auxiliary aids and services are made available to incarcerated individuals with special needs including hearing aids, qualified sign language interpreters, closed captioning, telephonic communication devices including text telephones (TTYs/TTDs) and Video Relay Services, to the extent available. The Department also provides audio books on tape, braille newspapers and/or magazines, large print materials, and magnifiers. Posters, which notify inmates of the name, address and phone number of the Disability Rights Coordinator for

incarcerated individuals, the Social Services Counselor and/or Grievance Coordinator assigned to each facility, and an explanation of the rights of incarcerated individuals with special needs to request a reasonable accommodation or file complaints are posted in applicable areas of all facilities.

- 4) Multilingual phones are well-maintained and located throughout visit houses and incarcerated individual services areas.
- 5) The Department procures ongoing contracted and budgeted coverage for translation and telephonic interpretation services.

The DOC always seeks to provide a safe, secure and respectful correctional environment by ensuring that incarcerated individuals have the tools they need to effectively communicate with our staff. The DOC also accounts for interactions with LEP individuals outside of our custody by providing comprehensible materials for public consumption on our multilingual agency website.

#### **IV. Agency Language Access Accomplishments and Progress on Goals from Previous LAIP**

Since the Department published its previous LAIP, we have attempted to advance and integrate LEP needs within security and service needs of incarcerated persons. The following eight accomplishments underscore our efforts:

1. The Department has installed numerous multilingual phones, which provide staff with readily available access to over two hundred languages via contracted operators. Each phone is lock-secured and housed with an accompanying logbook which records all phone activations (e.g. language, date, time, duration of call, signatures of staff accessing the system, and the name of the incarcerated individual requesting the service).
2. DOC Health Affairs Unit's Disability Rights Unit has secured Video Relay Systems (hereafter VRS) in areas in which incarcerated individuals receive support services. VRS can provide American Sign Language (hereafter ASL) as needed for LEP detainees.
3. Forty college students were recruited from CUNY undergraduate and graduate programs between the years of 2018 and 2020 to provide LAC assistance by reviewing translated documents for accuracy. These students offered their language skills remotely for periods ranging from three months to one year. In addition to LL30's ten designated languages, these students also provided language

services in Romanian, Fukanese, Mooré, Hindi, and others. The students’ areas of study included Psychology, Business Administration, International Business, Forensic Psychology, Journalism, Humanities, Law, Society and criminal Justice. Students’ input regarding the program was welcomed by Language Line (the contracted provider of these services). This program was an educational win/win, as it promoted learning and engagement while students gained valuable insight into DOC workings and the confidential handling of materials.

4. The DOC Academy engaged a contractor to conduct special trainings for Visit House supervisors who engage the public. The training addressed LEP persons and attendees were made aware of facility rosters, “I Speak” posters, and the multi-lingual phones located in their space.
5. The DOC Academy hosted several Fraternal Days for new officers, which allowed for the recruitment of new officers into fellowship with ethnic and culturally diverse peers. The Department actively encouraged new officers to volunteer their language skills for facility roster development.
6. The DOC Human Resources Division included information on the Language Bank and roster recruitment in their Orientation Package for new hires.
7. The DOC Public Information Office sent persistent reminders to staff regarding their ability to contact the LAC if they have language skill sets.
8. The Volunteer Language Bank, our shared resources center for Language Liaisons, offered ongoing assistance primarily with translated document review.

<b>2018 Goal</b>	<b>2021 Update</b>
1. Inclusion of LEP goals for New Recruits and In-Service Orientation/Training	1. The Correction Academy’s Fraternal Days initiated new officers into the language skills rosters and encouraged volunteering of their abilities.
2. LEP Orientation/Training for Civilian Managers	2. The Human Resources Division incorporated information on the language bank and roster recruitment in orientation materials for new hires.
3. Civilian Facility Staff Awareness of LL30	3. The Public Information Office sent reminders to staff regarding their ability to contact the LAC

	if they have language skill sets to promote compliance with LL30.
4. Medical provider provides data or are at least apprised of a LEP incarcerated individual's needs (this requires shared procedural approvals from both DOC and H+H).	4. Now that we have the language selection drop down menu in the intake process, we can now provide this data to our housing area officers and to contracted medical providers.
5. Expansion of telephonic services	5. Multilingual accessible phones were installed in all Visit Houses and support/counseling services areas.
6. Language ID Posters Re-Issuance	6. "I Speak Posters," are posted in conspicuous areas and remain legible, being replaced as needed.
7. Language Identification Memo Book Inserts Re-Issued	7. Memo Insert Cards (language identification) are carried continuously on all officers and are always available for immediate use.
8. VRS for incarcerated individuals who are deaf	8. The Health Affairs Unit's Disability Rights Unit has secured Video Relay Systems (hereafter VRS) in support services areas for incarcerated individuals. VRS can provide American Sign Language (hereafter ASL) as needed for LEP detainees.

## V. LEP Population Assessment

Our Population Research Group has implemented a four-factor resource assessment model, which utilizes data gleaned from our intake processing and citywide demographics sources.

Factor One (Number/Proportion of LEP population): Identifying people at risk of exclusion based on language barriers

Recent U.S. Census American Community Survey figures indicate that 22.4 % of individuals in New York State are foreign born. Overall in the United States, 13.7% of individuals are foreign born. In New York State, Hispanics and Latinos constitute 19.3% of our census population. According to census data provided by the Department of City Planning, 23% of New Yorkers or two million individuals self-identify as speaking English “less than very well,” and are defined as LEP (Limited English Proficient) persons. Census data indicated that the top ten languages for FY 18-21 are the following: Polish, Urdu, Arabic, French, Russian, Chinese (Simplified), Haitian-Creole, Korean, Spanish and Bengali.

#### Factor Two (Frequency of Contact): Identifying engagement

The DOC Population Research Group provided the figures below which indicate the scope of languages DOC encounters and accommodate; DOC often provides language services above the ten languages within the LL30 mandate. During Calendar Year 2020 (CY20 hereafter), DOC had a total admittance of 15,585 individuals. 96.4% of incarcerated individuals self reported understanding the English language to some degree. 2.9% self reported only speaking the Spanish language, 2% self reported only speaking other languages. Other languages reported by less than 1% of incarcerated individuals upon intake include Malayan, Turkish, French, Arabic, Albanian, Korean and Vietnamese. Twelve languages were presented in phone calls during CY20 as follows: Cambodian, Gana, Hokkien, Karenni / Kayah, Korean, Mandarin, Polish, Russian, Spanish, Tagalog, Tamil and Vietnamese. The majority of calls in descending order were as follows: Russian, Mandarin, Spanish, Korean, Vietnamese, Polish and Tagalog.

These figures highlight the importance of providing materials in multiple languages for safety, health and security considerations. The DOC is cognizant of the value of every person’s ability to access the same materials in a language they comprehend and will remain in compliance with LL30’s designated languages.

#### Factor Three (Nature/Importance of Program): The risk of language barriers

The DOC’s provision of language access services is multi-pronged. Since communication is key, DOC remains committed to servicing all incarcerated individuals and their loved ones within the scope of mandated services. While incarcerated individuals and loved ones can utilize 311, and incarcerated individuals can also utilize the DOC’s Office of Constituent Services for complaints, DOC seeks to avoid these situations with a proactive system in operation.

#### Factor Four (Resources Available): How DOC addresses our LEP response

The DOC provides services to address our ethnically diverse city’s needs. The DOC utilizes facility-based rosters of multilingual staff, and multilingual phones that

provide DOC with immediate access to a plethora of languages. The Volunteer Language Bank Liaisons provide shared language resources primarily as document reviewers. The DOC recruited college volunteers for a two-year period and their contributions were very much appreciated.

The L-RAD (long range acoustic device) system is a megaphone utilized to reach large capacity crowds which can be fitted with the ability to provide multi-lingual messaging. Implementation and use of the L-RAD system was an excellent addition to our available communicative tools which contributed to enhanced security.

We will continue to secure contracted vendors. Language Line always provides superb, timely and accurate document translation services. LMT Services, a minority woman-owned business, also provides excellent attention and care to our materials. Voiance secures our multilingual phone service which this LAC hasn't any report of complaint.

Because incarcerated individuals and public communications vary daily, the DOC will continue to provide language services as outlined in LL30. Providing clear, concise, timely, and accurate information is paramount to keeping everyone in our facilities safe. Thus, the DOC will provide coverage in no fewer than the ten languages required in LL30. The DOC's diverse staff also provides access to an array of languages above and beyond that which is required by LL30 (e.g. Vietnamese, Italian, Twi, and Greek).

## **VI. Provision of Language Access Services**

The Mayor's Office of Immigrant Affairs (MOIA) has helped DOC share methods of engagement from colleagues addressing LEP concerns. Further, our LEP sensitive staff decreases instances of miscommunications with the following features already employed:

### **Interpretation**

Interpretation Services are provided via Voiance through a telephonic system. Additionally, posters advertising MOIA's free interpreter services and "I Speak" posters appear throughout our Visit Houses and frequented areas of all commands (e.g. corridors, counseling services /program, support services). Additional language services are provided by our volunteer multilingual staff (rosters allow in-person LEP accommodation as needed), and multilingual accessible phones located within commands' Visit Houses for the public and support services for incarcerated individuals. The DOC generally has language coverage appropriate to our needs and has ready vendor access if additional languages above the LL30 required are needed.



## **Agency Communications**

The DOC provides Most Commonly Distributed (MCD) materials identified for public consumption on our agency website. The DOC continues to provide document translations as needed.

## **Plain Language Principles**

The DOC is mindful of its commitment to adhere to “plain language” principles and guidelines when creating policies, operations orders, directives, and materials distributed to incarcerated individuals and the public.

## **Staffing and Contracts**

The DOC will designate a LAC and Liaison for continuing engagement, reporting and assessment of agency LEP internal policy deliverables and LL30 compliance. Contracts will be engaged for translation and telephonic interpretation services. In-person interpretation, outside of DOC’s own staff, is not envisioned at this time.

## **Translation Services**

The process by which documents are translated is as follows:

1. MCD materials deemed final are submitted by management to the LAC.
2. LAC advises Language Line, the vendor responsible for translation, of the translation request and receives a cost quote. Costs vary depending upon the turnaround time required of the source requestor.
3. Depending on the document, the vendor may indicate that formatting or clarification is necessary. The LAC relays this information to the source submitter.
4. A timeframe is then established for completion of the materials.
5. Upon delivery of the materials, a sample review may occur with a reviewer(s). The materials are then forwarded to the submitter and the Segunda Center DOC Print Shop for production, command retrieval and distribution. The Segunda Center supplies materials in designated languages and secures the requisite number of copies for all DOC facilities.
6. Commands are alerted of their materials readiness in a coordinated, timely and efficient manner for command distribution.

The DOC is in the process of implementing a central repository for documents requesting translation for future consideration.

## **LAC Work with Emergency Preparedness and COVID-19 Preparedness**

The DOC website provides key engagement information in several languages. COVID-19 materials are regularly monitored and updated in multiple languages. DOC

also provides Most Commonly Distributed (MCD) materials identified for public consumption on our agency website. The DOC continues to provide document translations as immediately as possible.

The following documents provided in multiple languages during CY20 include: Inmate Rule Book, COVID-19 Power-Points, COVID Webpage, Body Scanner Signs, Inmate Grievance Forms, Property Retrieval Information, Social Distancing, and Visitor Screening. The DOC's provision of MCD in the ten languages identified in LL30 sufficiently meets agency needs.

## **VII. Training**

The Training Academy instructors have developed lesson plans utilizing LL30 and DOC Operations Orders and Directives cover procedures for all of the following: the multilingual phone system, use of facility rosters, assistance of the LAC when VLB requires activation, and VRS assistance for ASL requests from detainees. Training also includes IT guidance for proposed tracking and recording of LEP incarcerated individual needs.

## **VIII. Recordkeeping and Evaluation**

The Central Operations Desk (COD) maintains a logbook of facility requests for LEP assistance. Each multilingual phone is also accompanied by a logbook, in which the details of all phone activations are recorded (e.g. language, date, time, duration of call, signatures of staff accessing the system, and the name of the incarcerated individual requesting the service).

During the DOC's intake procedure, our computer system offers a language identification feature, which provides an opportunity to track language requests.

The utilization of VRS specifically for ASL assistance can be added to future reporting.

## **IX. Resource Analysis and Planning**

Language contracts are handled via the Central Office of Procurement (COP) and senior management. In the past, resource planning was far more predictable based on a stable pattern of translation requests in a given year. However, the COVID-19 pandemic resulted in a much larger, unexpected need for translated materials, thus increasing the required budget.

## **X. Outreach and Public Awareness of Language Access Services**

DOC's website provides information in over one hundred languages and DOC's Public Information Office periodically shares a PSA via the Department's Intranet reminding staff of the LAC's ongoing recruitment efforts. The "I Speak Posters" appear throughout DOC Visit Houses and commonly trafficked (e.g. Counseling Services, main corridors, etc.) command areas.

## **XI. Language Access Complaints**

The DOC website provides information in multiple languages regarding how to file a language access complaint through 311. Incarcerated individuals may also contact the DOC's Office of Constituent Services (OCS hereafter), which records and routes 311 complaints accordingly.

## **XII. Implementation Plan Logistics**

Managers from the Human Resources, Emergency Planning and Training Divisions as well as commanding officers continue to accommodate the LAC's requests for engaging staff. Further, the DOC Public Information Office publishes notices to staff of the LAC's ongoing language skill recruitment on the Department's intranet page. The chart below reflects future goals which will enhance the Department's ability to provide language services to LEP incarcerated individuals.

<b>Language Access Goal</b>	<b>Milestones</b>	<b>Responsible staff</b>	<b>Deadline</b>
Provide language services orientation and refresher training	Fully approved language access policy statement and template for training. No less than 70% of staff with direct population and public engagement access LEP training annually.	Agency Senior Staff	CY22
Improve tracking of language service provision	One hundred percent of staff will be required to incorporate logging	Senior IT Staff /Senior Uniform Staff	CY22

	their involvement with LEP persons.		
Distribute periodic roll call reminders of LL30's mandates	Teletype should be drafted detailing the provisions of LL30 so staff are aware	Agency senior staff	CY22
Closed captioning to include ASL in a corner of the orientation constant loop tape and voiceovers in Spanish.	The Department continues to work towards this goal. For now, we provide MCDs in various languages and accommodate ASL needs as required.	Agency senior staff	CY22



# **LANGUAGE ACCESS IMPLEMENTATION PLAN**

May 2021

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

Jacqueline Gold, Assistant Commissioner External Affairs

## **II. Agency mission and background**

The New York City Department of Finance (the agency) administers the tax and revenue laws of the City fairly, efficiently, and transparently to instill public confidence and encourage compliance while providing exceptional customer service. Through these efforts, our dedicated staff interface with the public in a variety of ways on a wide range of topics. The agency collects approximately \$40 billion in revenue for the City and values more than 1.1 million properties worth a total market value of more than \$1.3 trillion. The agency also:

- records and maintains public property records related to ownership, deeds, and mortgages
- administers exemption and abatement programs that provide \$3.6 billion in tax relief to property owners and renters
- adjudicates and collects parking tickets and provides time-saving programs to eligible drivers and businesses
- manages the City's treasury, with operating cash balances of more than \$12.5 billion
- acts as the City's chief civil law enforcer, through the Office of the Sheriff
- advises the mayor's administration on the City's \$200 billion pension system and \$20 billion deferred compensation plan

The City Register records and maintains all official documents related to real estate, including deeds, mortgages, and leases, and has offices in every borough except Staten Island, where the Office of the County Clerk provides these functions. City Register records from 1966 onward are maintained online in the Automated City Register Information System (ACRIS). The City Register also collects mortgage recording and real property transfer taxes.

The agency bills and collect property, business, and excise taxes; the state administers New York City's income and sales taxes. Tax payments are accepted online, by mail, or in person at any of agency's five business centers, one in each borough. Our business centers offer a variety of services, including payment processing, information desk services, parking ticket adjudications, and City Register staff. These centers serve as the most common venue of customer interaction, with over two million transactions a year totaling over \$1 billion.

For all taxes other than property taxes, our auditors monitor tax collections to prevent underpayments and non-payments. The agency collects unpaid taxes and other debt owed to the City through correspondence, phone calls, court actions, and other enforcement mechanisms.

The agency administers personal and commercial exemption and abatement programs. Our Rent Freeze program helps eligible seniors and people with disabilities to continue to live in the homes of their choice. Veterans, seniors, people with disabilities, and other eligible property owners can apply for exemptions to reduce their tax liability. Commercial property owners can benefit from the City's various tax abatement programs.

Parking and camera violations are one of agency's chief sources of customer interactions. Vehicle owners can pay or dispute their parking or camera violations online with CityPay, by mail, via our Pay or Dispute app with their mobile device, or in person at any of our five business centers. Our administrative law judges hear appeals of parking and camera violations, and the Adjudication Division employs a special unit for commercial vehicles.

The agency values all property in the City—more than 1.1 million parcels each year—to produce the assessment roll. The City's property tax rates are applied to a property's assessed value to calculate the tax its owner must pay. After the City's property tax rates are set each year by the Mayor and City Council, agency staff calculate, bill, and collect property taxes and other property-related charges. When property owners do not pay their taxes or other charges, the agency administers a property tax lien sale to transfer their debts to a private lienholder. The agency also maintains the official tax maps of New York City.

As the chief civil enforcement agency for the New York State Unified Court System, the Office of the Sheriff enforces mandates, orders, warrants, and decrees. The enforcement tools available to the Sheriff include evictions, property seizures, and the booting or towing of vehicles for judgment debt. The Sheriff's Office auctions its seized properties and regularly conducts tax

fraud investigations, with a particular focus on the enforcement of cigarette tax and traffic regulations.

The Treasury Division administers the City's network of bank accounts and manages its cash flow. Treasury staff manage the City's banking relationships and ensure that funds are deposited only in approved banks with appropriate collateral. The division holds all cash bail and court-ordered funds in trust until the funds are directed by the courts to be released. Members of the public interact with the cash bail process when a customer pays a deposit for the release of a person who has been arrested (also known as a defendant). The agency holds the money to help guarantee that the defendant will return to court for their trial. The Cash Bail is held in a bank account until the court closes the case and issues a court order to refund the Cash Bail to the person who paid it.

The Office of the Taxpayer Advocate is an independent office within the agency. The Taxpayer Advocate reports directly to the commissioner and can assist taxpayers with issues they have been not been able to resolve through normal agency channels. The Office of the Taxpayer Advocate can recommend policy changes and request that the agency act on behalf of taxpayers.

The Office of the Parking Advocate independently assists unrepresented and underrepresented members of the public with parking and camera violation issues and complaints that cannot be resolved through normal agency channels. The office acts as an intermediary between the public, agency units, and other agencies involved in the parking summons adjudication process.

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

The goal of the agency's Language Access Plan is to ensure that all members of the public, regardless of their English proficiency, have access to our information, programs, and services. This goal supports the four pillars of the agency's mission statement: transparency, fairness, efficiency, and customer service.

Beyond this, our policy comports with the intent of Local Law 30: New Yorkers with limited English proficiency (LEP) must be provided with meaningful access to the agency's services free of charge. From online forms to in-person interactions with staff, the agency will not only offer free interpretation and translation services but will actively publicize and advertise these services.



We will meet this goal by:

- identifying the LEP population and its needs
- providing essential interpretation and translation services
- training and educating our staff to identify and serve LEPs
- monitoring trends and the needs of LEPs

The agency has a variety of avenues through which we will accomplish this work, including public outreach events, customer interactions at our business centers, online resources, and an array of social media channels. Our modus operandi will center on providing interpretation and translation services throughout all public-facing components of the agency.

The agency has a clear definition of success for this plan: regardless of the type of interaction (letter, email, in-person, etc.), all efforts will be made to serve New Yorkers with limited English proficiency in their language of choice.

#### **IV. Agency language access accomplishments and progress on goals from previous LAIP**

Since the previous LAIP, the agency opened the Office of the Parking Summons Advocate (OPSA) whose mission is to independently assist unrepresented and underrepresented members of the public with parking and camera violation issues and complaints that cannot be resolved through normal agency channels. The office acts as an intermediary between the public, agency units, and other agencies involved in the parking and camera violations adjudication process; informs the public about parking laws, rules, regulations, and related agency policies and procedures; and identifies, reports, and recommends solutions to systemic problems and issues in the parking and camera violations adjudication process.

The driving community is well-represented by people with limited-English proficiency based on the exponential increase in demand for translated defenses from the Adjudication Division. The OPSA's brochure "A Guide to Paying or Disputing Parking Violations" was identified as a document that would be beneficial to the LEP community and therefore should be

translated into the ten languages stipulated by Local Law 30. This translation is now available on our website and in hard copy.

In addition, the agency, recognizing that owners of one to three family homes and condominiums are often exposed to lien sales due to falling behind on property tax payments, developed the Property Tax and Interest Deferral Program (PT AID). The program allows for property taxes to be deferred for a fixed length of time for a temporary hardship, or for a longer period due to a chronic hardship. An application was created and as LEP individuals are also homeowners, the application was submitted for translation and was made available to the LEP community.

In that same vein, the Property Information Update Form was developed. The forms were added to our roster of translated documents. The form allows property owners and other interested parties to update information on addresses and names for the agency to properly notify owners of bills, notices, and other timely and important events.

New units were created or identified as public-facing areas and as needing access to telephonic interpretation services. Specifically, the Office of the Parking Advocate, the PT AID Unit, the Disability Service Facilitator, and the Contact and the Business Contact Service Centers were developed or identified. Staff of the various units were trained and provided access to the agency's contracted vendor. They provide services to our LEP customers for assistance in parking and camera violation issues, disability access and services, property taxes and general services.

The Office of The Taxpayer Advocate, an office developed to help solve tax issues that have gone through the regular channels without resolution, determined that its Business Excise Tax brochure would be useful to inform our LEP customers of their rights and responsibilities regarding the reporting of business excise taxes. Accordingly, the brochure was translated and is available on our website.

As the contracts for both translation and interpretation services will end in June of 2021, the External Affairs Unit has identified key taskforce members to assist in the process of vetting vendors to provide these services going forward. They include the Language Access Liaison and the 311 Liaison, working under the auspices of the Language Access Coordinator. This group will work with the Budget and Contracting Units to assure that contracts are

in place for the continuation of translation and interpretation service provision.

The agency continues to update and amend our most requested documents that have been translated into the ten required languages. Since our last LAIP, we expanded that roster of available documents from ten to 30. The documents are available for request through our website, in person at our business centers and outreach events, by 311, by regular mail and through our case record management system.

## **V. LEP population assessment**

Before developing our implementation plan, the agency conducted an assessment to determine who needs our services, and in which languages. The agency's LEP population assessment is grounded in the “four factor analysis” defined by the U.S. Department of Justice and prescribed by LL30 §23-1102b, Item #3. These factors are as follows:

- Factor 1: the number or proportion of LEP persons in the eligible service population, determined by demographic analysis
- Factor 2: the frequency with which LEP individuals encounter the agency
- Factor 3: the importance of the benefit, service, information, or encounter to the customer
- Factor 4: the resources available to the agency and the cost of providing various types of language services

Since we serve all New York City residents, we use survey data that reflect the City's ever growing and changing population. The following sources provided the foundation of our LEP population assessment:

- The U.S. Census Bureau's American Community Surveys
- NYC Department of City Planning data and analysis

To ensure that the LAIP keeps pace with the needs of our customers, the agency will continue to review the American Community Survey for the City of New York as future editions are released.

With an estimated 2019 population of 8,336,817 distributed over about 302.6 square miles, New York City is the most densely populated major city in the United States. American Community Survey data indicate:

- 3.2 million New Yorkers are foreign-born.
- Approximately half of all New Yorkers speak only English at home.

- Of the four million residents who speak another language in the home, 1.9 million speak Spanish as their primary language.
- Over 719,000 speak Chinese, Japanese, or Korean.
- Twenty-one percent, or 1.8 million residents, speak English “less than very well.”
- The Indo-European languages of Hindustani (Hindi-Urdu), Portuguese, Bengali, Punjabi, Russian, German, French, and Persian are spoken by approximately 438,000 New Yorkers. Several of these are among the fastest growing languages within the LEP community.

The agency analyzes language requests from our customers to determine their needs. The agency utilizes data collected from interpretation and translation requests made over the phone (including 311), online, from our community partners and other City agencies, and via the agency’s customer case record management system. We will continue to monitor requests for interpretation and translations to determine if the roster of languages needs to be adjusted.

The residents of the City of New York depend on the agency as the agency is the central nervous system of New York City government. We collect the revenues that make every city service possible. Public education, police and fire protection, hospitals and healthcare facilities, parks and recreation centers—it all starts with the agency. Anyone who owns or drives a vehicle, owns a home, rents an apartment, or starts a business will interact with the agency at some point. With that in mind, the agency makes every effort to ensure that the LEP community can receive the same level of service provided to all our customers. Free interpretation services are offered at our public-facing areas and the Contact Service Center representatives are all qualified to provide interpretation assistance using our contracted vendor over the phone. The agency has translated over thirty of the most requested applications, forms and brochures which are available on our website, or by request in person, by mail, by phone or by email.

They are as follows:

A Guide to Paying or Disputing Parking Violations  
Administrative Fee Deduction Acknowledgment (2%)  
Application for a Certificate of Deposit  
Application for Certificate of Deposit  
Bail Assignment Application  
Business and Excise Tax - Your Rights and Responsibilities  
Cash Bail Refund Change of Address Notice  
Class 1 Property Tax Guide  
Class 2 Property Tax Guide  
DHE Initial Application  
DHE Renewal Application  
Do Not Miss Out on Your Cash Bail Refund  
DRIE Initial Application  
DRIE Renewal Application  
FAQ Notice of Recorded Document  
Freeze Your Rent - A Guide for Tenants  
Got a Ticket or Camera Violation?  
Notice of Property Value (NOPV)  
NYC Property and Business Tax Reference Card  
Parking / Camera Violations Appeal Application  
Property Assessment Appeals  
Protect Your Home: Deed  
Fraud Guide  
Recorded Document Notification  
Program  
SCHE Initial  
Application  
SCHE Renewal  
Application  
SCRIE  
Initial  
Application  
SCRIE Renewal  
Application  
Service of Process  
Intake Sheet  
Signature

Verification  
Signature  
Verification Form  
STAR Benefit Restoration Paper  
Application  
STAR/ESTAR Paper  
Application  
Stop  
Payment  
Affidavit  
Surety Survivor's  
Affidavit  
The Office of the Taxpayer Advocate  
Brochure  
Update Property and Billing  
Information  
Payment Past Due  
Notice

As we all know, CY20 presented us with a remarkable, life-changing, and continuing event. The COVID pandemic, in which New York City was the epicenter, affected all of us in ways that will take years, if not generations, to evaluate and determine repercussions. Suffice to say, the number of requests for translated materials and interpretation assistance was reduced because our business offices were closed for many months and although our phone service centers and website was operating, the majority of our staff was working from home. That said, there were 5803 requests for translated materials, the vast majority for Chinese (43.7%) and Spanish (17.8%) with Russian (11.4%), Korean (8.2%), Bengali (7.2%) and the other required languages comprising the rest of the requests.

A review of interpretation requests indicated that most requests (97%) were comprised of the ten citywide languages mandated by Local Law 30: Spanish 66.1% Mandarin 17.6% Russian 4.2% Bengali 2.7% Cantonese 2.7% Arabic 1.2% Korean 1.1% Haitian Creole 1.0% French 1.0% Urdu 1.0% Polish 1.0% .

These statistics represent only direct requests received by the agency. They do not account for the additional materials that are distributed through our

community partners, including elected officials, community organizations, and other agencies that request, copy, and maintain translated documents and applications at their various locations.

The agency provides interpretation service through our vendor, Voiance, and has well over 400 staff members trained to use the over the phone service. With the assistance of our vendor for translation services, Geneva, we continue to provide translated documents in the ten languages required by Local Law 30. Although tempered by the pandemic, the agency still spent \$41,215 on translations. Interpretation expenses totaled \$14,360. We will continue to provide these services to the LEP community under the citywide language access service contracts provided through DCAS.

We have seen increased demand for Hindi, Punjabi, Turkish, Albanian, Greek, Italian, and Hebrew translations and interpretations. Although these languages comprise less than 1% of all requests, we will continue to monitor their frequency and adjust our plan as necessary.

## **VI. Provision of Language Access Services**

The agency provides language access services to our LEP community by having the most requested documents, currently 30, translated into the ten languages required by law. These documents are available for download from our website using private servers or from our kiosks available for public use at our business centers. The documents can also be requested by regular mail, by phone through 311, through our dedicated contact centers, through our case record management system, or in person at our business centers and outreach events. We are currently contracted with Geneva Worldwide Services for document translation. The contract is scheduled to end in June of 2021, and we are working with our budget and contracting office to make certain there is no lapse in service provision.

The 311 Liaison, in coordination with unit managers and under the direction of the Language Access Coordinator, manages the requests for translation services. Unit managers communicate directly with the 311 Liaison to request revisions of current materials or identify and recommend new documents for translation.

The agency maintains a style guide and glossary which our vendor has

accessed to maintain the integrity of the translations. We also accept feedback from staff and the LEP community. Staff are informed of the translation services we provide at regular orientation sessions and are guided to use our intra-agency website for further information.

We provide interpretation services through our contractor, Voiance. They provide interpretations in over 300 languages. The LEP community can request assistance in their language on the phone through our contact service center, 311, or in person at our business centers, walk-in exemption center, adjudication units or at outreach events.

Interpretation requests are managed by the Language Access Liaison under the direction of the Language Access Coordinator. The Liaison is the point of contact with the vendor, maintains records and provides training and access to public facing staff.

Visitors who require language access service are given "I Speak" cards at our reception areas in our public facing areas to help identify their language needs. Along with ample signage offering free interpretation services, the LEP community is provided with the support they need to complete their business with the agency.

Our interpretation vendor provides our end users with an opportunity to provide feedback on individual interpretations. Endemic issues are reported to the Liaison for correction.

Program, frontline and outreach staff are informed of the interpretation services provided by the agency during regular orientation sessions and are directed by unit managers to review the policies in our intra-agency website.

The agency publishes lien sale notices in several local newspapers in many languages. In addition, when new initiatives are developed and determined to be valuable to our LEP community, the notices are translated and made available on our website and in print form for our public facing areas. Notices for outreach events in areas with specific language needs are translated with the coordination of elected officials and community service providers.

The agency has a full time Editor who reviews all printed content and website content to assure plain language. This includes all our forms, applications, brochures, notices and documents. Before documents or website information is translated, the Editor and Webmaster review the content for integrity, style, format, and adherence to the agency glossary as well as plain language. The Editor provides training and direction to unit managers on same. The Editor gives a presentation on "Plain Language and Customer



Friendly Communication” at all new employee orientations so that all incoming employees are introduced to the concepts. In reviewing documents, the Editor ensures that print and web content meet the following standards:

- The action requested of the document’s audience is stated clearly and concisely at the outset of the document.
- The document’s sequence facilitates easy comprehension, with the most important information first.
- The document has a uniform look and feel: fonts are uniform or complementary, text size is consistent, etc.
- Any instructions or worksheets are concise and easy to follow.
- Each section of the document is clearly distinct from the others, so that the recipient will be able to understand exactly what each section means and where it ends.
- Information is not duplicated unnecessarily.
- Jargon and excessive capitalization are eliminated.
- Obscure examples & instructions are eliminated.
- Text effects (bold, italics, underline) are restricted to the most important information.
- The document’s language is clear, and its tone is helpful and friendly using “you” language.
- Caveats (you may not be eligible if ...) and negative language (no, NOT eligible, etc.) are minimized.
- All other DOF style guide requirements are met.

The agency makes great efforts to incorporate plain language principles into our public communications before they are translated. We have developed an agency style guide around several key principles, including:

- **Clarity:** Communicate in simple, plain language, without sounding cold or abrupt. Avoid jargon, acronyms, and legalese. Use active voice to create a sense of immediacy and to encourage understanding and compliance.
- **Simplicity:** Keep language simple. Break up long sentences. Do not write “utilize” when “use” will do.
- **Relevance:** Tell readers what they need to know, not what our internal process is.
- **Tone:** Engage in human rather than institutional communication. Show empathy, demonstrate flexibility and transparency, and, when necessary, admit mistakes.

Policies and procedures on how to identify LEP needs and provide service are maintained in the intra-agency website. Unit managers communicate with the Language Access Liaison, the 311 Liaison and the Language Access Coordinator to determine translation and interpretation needs.

Free interpretation service availability signage is posted in all our public facing areas. The signs offer interpretation assistance in the ten languages as well as information on how to file a complaint. Reception areas in our public facing areas are supplied with "I Speak" cards to help the LEP community.

The vendor provides far more than the required 200 languages in their roster. If an LEP customer requires a translation in a language other than the required, staff are instructed to communicate with their supervisor who then communicates with the language access team. We make every effort to accommodate these requests.

Our language access services are provided whenever and wherever the agency is open for business and through our website 24/7. If a natural disaster or other city-wide emergency should necessitate the closure of our offices or affect our ability to serve customers by phone, notices in all ten languages will be posted on our website.

The agency maintains a list of all staff members contact information should an emergency arise after hours or on non-working days. The Language Access Liaison is a staff member of Emergency Operations and is assigned to COVID-19 Operations (General Staff), Coastal Storm Shelter Operations (Shelter Supervisor) and Post-Emergency Canvassing Operations (PECO Canvassing Assembly Point Staff). With over 400 staff members trained in over-the-phone interpretation, the agency can provide these interpretation services in offsite areas such as temporary shelters.

Our interpretation vendor provides service 24/7, 365 days a year. Our translation vendor has provided quick turnaround on special projects in as little as four hours on demand.

## **VII. Training**

The agency understands the importance of training and the importance of staff awareness agency wide. All new staff members attend a mandatory orientation as part of their on-boarding process. The language access plan

and associated policies are presented and discussed at this orientation, along with background on the importance of language access and an overview of the city's demographics. Staff are informed that more information can be found on the agency's intra-agency website. The training component on language access is performed by the 311 Liaison and/or the Language Access Liaison.

Staff who work in public-facing units attend over the phone interpretation training with the Language Access Liaison. More than 400 staff members have been trained. These units include:

- External Affairs Correspondence and Outreach
- Treasury/Court Assets
- SCRIE/DRIE Walk-in Center
- Office of the Taxpayer Advocate
- Collections
- City Register/Land Records
- Assessors
- Office of the Sheriff
- Tax Enforcement
- Parking Enforcement
- Business Center staff
- Parking Advocate Staff
- Call Center Representatives

The training provides information on:

- identifying a customer's primary language
- reporting requests for language services
- best practices for telephonic interpretation
- plain language, cultural competency, and disability communications

The Language Access Liaison provides opportunities upon request for refresher courses to all previously trained staff members.

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

Monthly reports on interpretation and website translation requests are collected and monitored to see if new trends are emerging, particularly in

languages other than the ten required. Staff have an opportunity to communicate with the 311 Liaison and the Language Access Liaison directly or through their managers should any quality issues arise in both translations and interpretations.

The Language Access Coordinator meets regularly with Executive Staff to discuss a variety of issues as well as language access concerns. The Language Access Liaison Coordinator and 311 Liaison, under the auspices of the Language Access Coordinator, are the point persons for all agency staff. They provide all tools such as translations of forms and signs and “I Speak” cards where needed. The public-facing units all have posters that inform the limited-English proficient community how to provide feedback on our customer service.

The Language Access Liaison Coordinator and 311 Liaison are also involved in the review and assessment of the vendors that provide the agency with document translation and over-the-phone interpretation. They also represent the Language Access Coordinator at meetings scheduled by the Mayor’s Office of Immigrant Affairs. At these meetings, language access representatives from all of the various City agencies share ideas, discuss service contracting options, review survey findings, discuss policy and procedures, and make recommendations for changes and improvements in the provision of language access services.

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

The Language Access Liaison Coordinator and 311 Liaison report directly to the Language Access Coordinator. Unit managers are responsible for monitoring and providing language access in the various public-facing and phone only contact areas.

Both the interpretation contract and translation contract expire in June of 2021 and the budget and contracting units, along with the unit managers, are working on details to develop new contracts. The agency has a staff member dedicated to digital communications and coordinates requests for translations with the 311 Liaison.

The agency recognizes the value and importance of language access and has placed an emphasis on providing financial resources towards these efforts.

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

The agency's strategy for creating public awareness is multi-pronged and encompasses all public communications and interactions produced and sponsored by the agency. The agency mails millions of pieces per year. Mailings for which a translation is available include a standard insert that reads, "This is an important notice from the New York City Department of Finance. Please read it carefully. This notice is available in Arabic, Bengali, Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu upon request. Call 311 for assistance." This statement is translated into the ten required languages.

The agency's home page provides a translation link that visitors can click for a dropdown list of available (currently well over a hundred) languages. The translated documents already on the website have links below or beside them that can be clicked to access the documents.

Our public-facing areas have signs offering free interpretation services posted prominently. In addition, our business centers offer computer kiosks at which members of the public can download translated forms, notices, applications, and other documents. Signage offering the use of these kiosks is displayed in the ten required languages. Staff members at public-facing areas present "I Speak" cards to customers who display limited English proficiency. The cards allow customers to point to the language in which they would prefer to communicate.

Our dedicated Outreach Unit, part of the External Affairs Division which reports to the Language Access Coordinator, is fully trained in providing interpretation services. In addition, they work together with elected officials and community organizations to provide support in the languages requested by same.

## **XI. Language Access complaints**

Through a partnership with 311, the agency has established a process to monitor and respond in a timely fashion to public complaints regarding language access. When 311 receives a complaint directed at the agency, our language access coordinator is notified. The complaint is then addressed through the appropriate business unit. Posters in our public-facing areas offering Free Interpretation Service inform the public that they can register complaints directly with the unit manager or call 311. The manager handles the complaint and informs the Language Access Liaison so that endemic issues are resolved. When 311 receives a complaint directed at the agency, the Language Access Liaison is notified. The complaint is then addressed through the appropriate unit. The agency employs a similar process for complaints reported directly to the agency either by mail or email, or through our Contact Service Center. The staff member receiving the complaint will forward complaints to the Language Access Liaison for resolution. There were no complaints in CY 20.

## **XII. Implementation plan logistics**

The External Affairs Assistant Commissioner serves as the agency's Language Access Coordinator and is committed to updating this plan every three years, or sooner if necessary and/or prudent. This plan will be made available on the public-facing website.

Language Access Goal	Milestones	Responsible Staff	Deadline
Expand translations for "Property Brochure Tax Class 2" to include Arabic, Bengali, French, Haitian Creole, Polish and Urdu	Obtain quote from vendor; obtain approval from unithead	Language Access Coordinator; 311 Liaison	7/1/2021
Review and revise Property Exemption Applications	Obtain quote from vendor; obtain approval from unithead	Language Access Coordinator; 311 Liaison	Annual basis
Review and revise Rent Freeze Program Applications	Obtain quote from vendor; obtain approval from unithead	Language Access Coordinator; 311 Liaison	Annual basis
Assess and update agency website to make translated forms easier to find		Web & Forms unit; Language Access Coordinator; Language Access Liaison; 311 Liaison; Editor	Continuing basis
Increase the number of documents translated into the ten required languages	Review of requests for language assistance, obtain input from unit managers	Language Access Coordinator; 311 Liaison	Continuing basis
Renew contracts for interpretation and translation		Budget and Contracting, Unit managers, Language Access Coordinator; 311 Liaison	6/2021

New York City  
Department of Health and Mental Hygiene's  
Language Access Implementation Plan  
2021



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## **Language Access Manager: Luis Valle**

### **I. Agency Mission and Background**

With an annual budget of \$1.6 billion and more than 6,000 employees throughout the five boroughs, the New York City Department of Health and Mental Hygiene (NYC Health Department) is one of the largest public health agencies in the world. The NYC Health Department is also one of the nation's oldest public health agencies, with more than 200 years of leadership in the field.

Every day, the NYC Health Department staff protect and promote the health of over 8 million diverse New Yorkers. The agency's work is broad-ranging: staff members inspect and grade dining establishments, provide dog and food licenses, work in low- to no-cost health clinics across the city, and provide birth certificates for our youngest New Yorkers.

The agency's disease detectives investigate suspicious clusters of illness, and the agency's epidemiologists study the patterns, causes and effects of health and disease conditions in New York City neighborhoods. These studies shape policy decisions and the City's health agenda.

The NYC Health Department addresses many health issues, including obesity, diabetes, heart disease, HIV/AIDS, tobacco addiction, substance abuse and the threat of bioterrorism. The agency also works to address enduring gaps in health between White New Yorkers and Black, Latino and other communities of color. Structural racism is at the root of these health inequities, which is why the NYC Health Department has made racial and social justice a priority. In a city where 40 percent of the population is foreign-born and 24 percent has limited English proficiency (LEP),<sup>1</sup> providing language services is vital to the agency's mission and goals.

### **II. Agency Language Access Policy and Goals**

The Health Department established its Language Access Policy in the spring of 2016 to eliminate language barriers to agency services. Agency personnel are required to follow this policy when providing services to, or interacting with, LEP clients. The agency's Publications and Language Access unit implements and enforces the Language Access Policy, which is consistent with the Civil Rights Act of 1964, Executive Order 120 and Local Law 30.

Since 2016, the agency's Language Access Policy has included the following language assistance measures to ensure that eligible LEP clients receive the same quality services as their English-speaking counterparts:

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<sup>1</sup> U.S. Census Bureau, 2018 American Community Survey

## A. Population Needs

- a. Emergency communications, legal notices and priority communications intended for all New Yorkers will be translated into any languages spoken by at least 1% of New York City's LEP population (see **Appendix A** for details).
- b. All other communications will be translated into any languages spoken by at least 5% of the eligible population, as determined by program or census data. Files may be translated into additional languages if necessary.
- c. Regardless of language, program or census data, staff members will provide language services to LEP New Yorkers upon request or if a need is identified.

## B. Required Language Services

- a. The following language services **are required** when interacting with LEP New Yorkers:
  - i. Publications that are written in plain language and professionally translated
  - ii. Professional interpretation, including telephonic, in-person and ASL interpretation
- b. The following language services **are permitted** under certain conditions:
  - i. **Assistance from multilingual staff members:** Multilingual staff members can provide direct language services (services in a non-English language) in non-medical settings. In medical settings, multilingual staff members can provide direct language services when giving general guidance or information (such as hours, directions, etc.).
  - ii. **Language services from medical staff members:** Medical staff members who wish to provide services in a non-English language must have completed a language fluency assessment for medical vocabulary.
- c. The following language services **are not permitted** because they could be at risk of violating privacy rights, causing confusion and/or placing LEP New Yorkers at risk for medical errors
  - i. In-house translations (not including those completed by the professional translators in the Office of External Affairs Language Services unit)
  - ii. Interpretation help from children under 18 years of age
  - iii. In medical settings, interpretation help from friends or relatives, or from staff members who are not involved in the patient's care or who have not passed a fluency assessment
- d. **If an LEP patient declines interpretation services in a medical setting**, staff must:
  - i. Reiterate that language assistance is free and is the patient's right
  - ii. Explain that providing language assistance is required by Health Department's policy
  - iii. Call an interpreter even if the patient chooses to use a friend or relative

Although the Health Department honors a patient's right to decline language services, Health Department staff also should have a qualified interpreter present or on the phone to avoid

miscommunication and to protect the Health Department from potential liability. If the patient chooses to use a friend or relative as an interpreter, the Health Department staff member should call LanguageLine to have a professional interpreter on the line and ask them to speak only to correct any omissions or mistakes in interpretation.

**C. Mandatory Staff Training:** The Health Department will provide the following **mandatory trainings** to help staff members comply with the Health Department's policies and provide meaningful access to services for LEP New Yorkers.

a. **Introduction to language access for new hires:** New-hire orientation covers:

- i. The Health Department's Language Access Policy
- ii. Required language services, as defined above
- iii. The Office of External Affairs Language Services unit

b. **Annual language access training:** With support from the Language Services unit each division will provide annual trainings for the following staff:

- i. Staff who have the potential to interact with LEP individuals
- ii. Staff who arrange for language services
- iii. Program directors

The annual training includes details on how to access language services, how to request written translations of vital documents, request interpretation services and provide services in a non-English language.

**D. Hiring Multilingual Staff**

The Health Department encourages divisions to take language skills into account when hiring in order to facilitate serving LEP New Yorkers. Divisions wishing to hire bilingual staff for front-line positions can indicate the desired language skills in the "Preferred Skills" section of the job vacancy notice for provisional and civil service hiring. The Language Services unit will also facilitate a fluency assessment for staff who wish to provide services to New Yorkers in a language other than English.

**E. Communications:** Each Health Department division will designate at least one language access liaison per division. Divisions may also designate additional liaisons per bureau. The liaisons will be responsible for:

- i. Attending quarterly language access meetings to review reporting and assessment data
- ii. Coordinating language access trainings with the Language Services unit
- iii. Collecting and submitting to the Language Services unit data regarding New Yorkers served and in which languages
- iv. Reinforcing the Health Department's Language Access Policy and protocols throughout the division

### **III. Agency Language Access Accomplishments and Progress on Goals**

The Language Access team was created in 2016, with only one staff member, with the goal of eliminating all barriers to agency services and ensuring meaningful access for the many LEP communities in New York City. The Language Access team has grown to include more staff and is now part of the Language Services unit within the Office of External Affairs. The team has been able to accomplish some of our goals as noted below:

- The Language Services unit was created in 2019 as a distinct and dedicated unit within the NYC Health Department. This has permitted the Language Services unit to concentrate on continuing to build up an agency infrastructure for effective and appropriate delivery of language services to the LEP community we serve.
- The Language Access team has grown to include two language access coordinators, a trainer and a team manager. The increased capacity has permitted the team to increase targeted outreach and support to our agency's programs.
- Language Services unit hired its first ever Chinese translator and project manager. This has permitted the unit to not only increase capacity for Simplified and Traditional Chinese translations, which has been especially important during the agency's COVID-19 response, as well as allowed us to improve the quality of agency materials in these two scripts.
- The agency is in compliance with Local Laws 26, 30 and 65 per a recent audit by the Comptroller's Office.
- The Language Services unit created program-specific and agency glossaries to ensure consistency and high quality of all translated agency documents.
- The NYC Health Department's Language Access Policy was updated along with other related documents designed to provide guidance to staff when providing direct services to clients.
- The Language Services unit was instrumental during the COVID-19 pandemic in ensuring that LEP New Yorkers received vital, in time and life-saving information in their own language in various media platforms. The unit has managed the translation of more than 500 documents and materials for translations. The unit also provided training and procured interpretation services and all kinds of signs to our vaccination sites.
- The Language Services unit went beyond the top 13 languages and expanded to 26 languages for most COVID-19 translated materials.
- The Language Services unit supported the agency's COVID-19 activation at our vaccination sites by providing in-person interpretation services, translated signs, documents and all other collateral.
- The Language Services unit supported the agency's COVID-19 outreach efforts in vulnerable communities in NYC such as the indigenous communities of Latin America by providing census and programmatic data along with agency resources.

- The agency's speaker's bureau trained over 70 staff members proficient in English, Spanish, Bengali, Mandarin and Cantonese to deliver presentations throughout the 5 boroughs on COVID-19-related information.
- The Marketing team led the creative development, production, printing, release and placement of 35 large-scale media campaigns in multiple languages including 528 videos developed, of which 496 are in languages other than English
- The Social Media team developed custom web page and custom translated those web pages to better reach Limited English Proficient New Yorkers.
- The Communications team collaborated with and supported other city agencies, including NYCEM, DOITT, MOIA, NYCHR, DOE, CFB, BOE, Democracy NYC, MOPT.
- Our agency website had 688,856 views in languages other than English.
- Our Press Office did over 100 press events in multiple languages.

We've also made progress in some of our long-term goals:

- **Conduct site visits to all public-facing sites annually**

The NYC Health Department's Language Access Policy mandates that the Language Services unit assess the progress of Local Law 30 requirements by performing annual site visits to all our public-facing sites to ensure:

1. Translated documents are available on the premises or ready to print
2. Translated informational/directional signs are posted
3. Multilingual sign noting free interpretation signs are posted
4. Staff are trained in the Health Department's language access policy and procedures

Our language access trainer has led and continues the annual the effort to visit all 36 of the agency's public-facing sites. These site visits are an important component of mission by allowing us to identify any gaps in services and be able to provide technical assistance to staff.

- **Conduct annual training for all public-facing staff**

As with site visits, our unit is required to conduct annual trainings for all public-facing staff. Our unit was successful in conducting these trainings. We are currently working on revamping this training to include updated language access protocols, visuals and expanding our online/virtual platforms.

- **Continue providing fluency assessment to clinical providers who wish to provide direct services in a different language**

The agency continues to be committed to eliminating language barriers and ensuring meaningful access to health services for all LEP New Yorkers. In this spirit, the agency continues to offer fluency assessments in over 30 languages to all clinical and non-clinical providers wishing to provide direct services in a different language. 352 clinical staff have taken a fluency assessment and passed.

## IV. LEP Population Assessment

In response to Executive Order 13166 , “Improving Access to Services for Persons with Limited English Proficiency”<sup>2</sup> in 2002, the U.S. Department of Justice developed the following “four-factor analysis”<sup>3</sup> providing agencies with “flexible and fact-dependent” guidelines meant for identifying LEP client populations and their needs:

1. The number or proportion of LEP persons in the eligible service population
2. The frequency with which LEP individuals come into contact with the agency
3. The importance of the benefit, service, information, or encounter to the LEP person (including consequences of lack of language services or inadequate interpretation/translation) and,
4. The resources available to the agency and the costs of providing various types of language services.<sup>3</sup>

As dictated by Local Law 30, the NYC Health Department took into consideration these four factors in writing and implementing our Language Access Policy and will continue to do so in the planning of the provision of language services to our LEP clients.

1. *The number or proportion of LEP persons eligible to be served or likely to be encountered by the program.*

New York City has a limited English proficient (LEP) population of 24 percent according to the U.S. Census Bureau’s 2018 American Community Survey<sup>1</sup>. As the Health Department provides benefits and health services to all New Yorkers, we expect to serve all of New York City’s eligible LEP population. The profile of our LEP clients, however, varies across our myriad agency programs and neighborhoods and, in many instances, differs from the city’s overall LEP residents. As a result, the agency’s Language Access Policy mandates that all direct public services directed at all New Yorkers be provided in languages supplemental to the 10 designated citywide languages required in Local Law 30. The Policy requires that these supplemental languages be any languages spoken by at least 1 percent of New York City’s LEP population based on U.S. census data<sup>1</sup>. As of 2017 these languages (including the designated citywide languages) were: Spanish, Russian, Cantonese, Haitian Creole, Korean, Bengali, Mandarin, Italian, Polish, Yiddish, Arabic, French and Urdu. All other communications or documents will be translated into any languages spoken by at least 5 percent of a program’s eligible population, as determined by programmatic or census data. The Language Services unit evaluates the American Community Survey annually to ensure the language services list for essential communications remains current and serves the needs of the city’s LEP residents. It also works with bureau liaisons to obtain up-to-date data from programs.

2. *The frequency with which LEP individuals come in contact with the program.*

The agency serves more than 8 million New Yorkers from diverse, cultural and economic backgrounds. The agency’s services range from performing inspection grades for dining

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<sup>2</sup> <https://www.gpo.gov/fdsys/pkg/FR-2000-08-16/pdf/00-20938.pdf>

<sup>3</sup> <https://www.gpo.gov/fdsys/pkg/FR-2002-06-18/pdf/02-15207.pdf>



establishments and street food vendors to providing birth certificates to offering sexual health, immunization and tuberculosis services at our low- to no-cost health clinics in all five boroughs. All agency public-facing staff are trained by the Language Services team to contact our telephonic interpreter vendor during LEP client interactions. The Health Department uses vendor data, demographic data survey, agency intake forms, as proxy for frequency of agency interactions with which LEP individuals come in contact with agency programs.

3. *The nature and importance of the program, activity or service provided by the program to people's lives.*

The agency provides many direct services to the public. Through its clinics, hotlines, restaurants and child care inspectors, Action Centers and disease detectives, the NYC Health Department plays a strong and active role in protecting and promoting the physical and mental health and well-being of all New Yorkers. The importance of this mission to the continued health and productivity of New York City cannot be overstated. As such, it is critical for the agency to provide language access to public services that have a direct public health impact or that provide legal and commercial licensing information. The agency provides language services to all Article-28-covered clinical services and all other walk-in facilities and their related public (essential) documents in the agencywide 13 LEP languages. Moreover, the language access coordinator helps each division assess translation and interpretation needs for each site's target population and provide those services accordingly.

4. *The resources available to the agency and costs.*

The NYC Health Department provides telephonic interpretation in more than 240 languages, as well as in-person interpretation (spoken and ASL) to its clients. The agency also provides professional translations of materials for target populations and the general public through the use of a professional translation vendor and one review vendors. The agency has contracts and purchase orders to facilitate language access services of over \$2 million dollars. Most of these services are centrally funded, and do not require programs to have independent funding to offer them or clients to pay for them. The agency also employs two full-time Spanish translators and one Chinese translator.

As part of the Language Access Policy, the agency developed, with the help of a vendor, a clinical fluency assessment for staff tailored to the specific needs of each bureau providing direct clinical services. This clinical fluency assessment, along with a general fluency assessment, is available to all public-facing staff in an effort to improve the quality of language access services to the LEP populations in the city. To date, more than 352 clinical and nonclinical staff have taken the assessment and passed with high scores.

## **V. Provision of Language Access Services**

### **1. Interpretation Services**

a. How will you provide interpretation – both over the phone and at service centers?

All agency public-facing sites and staff have 24/7 access to telephonic interpretation services covering more than 240 languages from a professional citywide vendor, LanguageLine Solutions.

Our health clinics and Neighborhood Health Action Centers also have access to video-remote interpretation for over 100 languages in addition to American Sign Language (ASL) interpretation. Front-line staff are made aware of these language services resources and how to request these services at their annual language access trainings. We are currently working with our contracted vendors, Accurate, to expand services to all of our sites and have it available to all field staff. In-person interpretation services are also available for public community events through our vendors, Geneva. As public community events and hearings are under the purview of the Community Affairs team within the Office of External Affairs, the language access team coordinates between programs and Community Affairs. The language access coordinators help programs assess their language service needs using previously collected programmatic data and community-level data. This allows the program to not only request the appropriate in-person interpreter from Community Affairs but also to be able to advertise the event to the target populations by translating flyers prior to the event.

The NYC Health Department is committed to reducing racial and health disparities among our LEP clients by providing them with timely and quality services. The agency has long offered professional interpretation services to New York City's LEP population using the DCAS citywide contracts. However, the agency is currently in the process of creating and issuing RFPs to increase the breadth and increase the pool of vendors we can utilize for these services. The agency currently uses three primary vendors: LanguageLine, Accurate and Geneva.

In addition to vendor-provided interpretation and translation services, multilingual medical and non-medical staff also provide services to LEP clients. The language access policy encourages agency leadership to continue to hire multilingual staff in all service areas. Medical staff who wish to provide medical services in a language other than English must pass a professional fluency assessment which will be administered by the Language Access Manager. Non-medical staff also have the option to take a standard fluency assessment to prove competency in a certain language. Non-medical staff who wish to provide competent services in a different language, other than basic information and directions, must pass the fluency assessment to do so. The Language Access Policy requires all public-facing staff to go through annual trainings on how to provide meaningful, competent and culturally sensitive services to all LEP clients. These trainings also include a best-practices module on providing proper interpreter services which allows front-line staff to determine which type of interpretation (telephonic interpretation vs in-person interpretation vs bilingual staff) to use under varied circumstances.

b. How will you identify the primary language of your customers?

In the U.S. Census Bureau's American Community Survey (ACS), LEP individuals are people 5 years or older who self-identify as speaking English less than "very well."<sup>4</sup> The agency uses this designation to identify LEP clients and their primary language when providing services. While the agency does not have a standardized system of collecting and tracking a client's primary or preferred language, all Article-28-covered clinical facilities and all other walk-in facilities currently collect this information from their eligible clients. The language access coordinator collects this de-identified information from these facilities and sites and helps them track it. We are currently looking for ways to create a standardized system of collecting language access data

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<sup>4</sup> [www.lep.gov](http://www.lep.gov)

for agency programs currently not doing so. The agency utilizes the community district data from the ACS not only to identify the different LEP communities in New York City but also to identify gaps in services between active (currently enrolled) and eligible community clients within those communities. ACS data, along with data submitted by agency programs, have allowed the language access team to create language lists for most programs (see example in **Appendix B**) with the languages spoken by at least 5 percent of the LEP eligible population.

Agency public-facing staff identify the client's primary or preferred language at initial encounters either by asking "What is your primary language?" or "What is your preferred language?" on intake or enrollment forms. Staff can also utilize a language ID sheet (see **Appendix C**) which informs clients in 24 languages of their right to receive free services in their preferred language. This tool is especially useful for our field staff. Additionally, medical and non-medical staff who have passed a professional fluency assessment are able to wear an "I Speak..." button, which lets clients know they are able to communicate in a specific language other than English.

The Language Services unit works with the digital communications department to upload all essential program documents and notices to the agency's website. The agency is currently translating content into the top 13 languages and re-designing our Language Services webpage where LEP clients, who have access to Internet, can find our resources and services in their respective language. The unit also works with all public-facing programs to help with the printing and distribution of many of our translated materials and documents.

c. How will you ensure that your contractor provides quality services?

The Language Services unit will ensure that our interpretation and translation vendors provide quality services by continuing to have monthly or quarterly meetings with our vendors. The Language Services unit has created a shared document, available to all agency staff, where staff can report poor or insufficient services provided by our vendors. The monthly or quarterly meetings are designed to hold our vendors accountable for their services

## 2. Translation of Written Material

a. How will you identify and translate essential public documents?

The agency's Language Access Policy requires that each division and bureaus designate a language access liaison. The language access team meets with each liaison monthly and with all liaisons on a quarterly basis. Each liaison is tasked with helping each program identify essential or vital public documents. The agency defines "essential public documents" as:

- Consent forms
- Written notices of clients' rights and responsibilities
- Notices advising LEP persons of free language assistance
- Applications or intake forms to receive public services that have immediate or large-scale health impact
- Notices of services provided

After careful vetting and review, the Language Services team translates these documents into the top languages (1 percent threshold) spoken by New York City's LEP population using our contracted vendors.

All other communications or documents will be translated into any languages spoken by at least 5 percent of a program's eligible population, as determined by programmatic or census data. The Language Services unit evaluates the American Community Survey annually to ensure the language services list for essential communications remains current and serves the needs of the city's LEP residents. It also works with bureau liaisons to obtain up-to-date data from programs.

Agency staff are informed of language services resources and translation request processes during annual language access trainings and divisional liaisons. Divisional communications liaisons are responsible for submitting translation requests to the Language Services unit through the agency's electronic Communications Project Request system (eCPR). The request is then assigned to a Language Services team member who manages the translation request. Programs are then responsible for dissemination of translated materials to their target populations.

b. How will you ensure that your contractor provides quality services?

The agency has a review process in place to ensure quality translation services. A third-party review vendor reviews the following types of documents translated by LanguageLine: newsletters, legal documents/notices, vital documents, factsheets, handouts, items with a longer shelf life, high priority or politically sensitive items and items for a broad audience. Translated documents are then sent back to LanguageLine for final changes. We have two professional Spanish translators and one Chinese translator who also review LanguageLine-translated documents.

To ensure consistency and high-quality language services in agency translations, the Language Services unit has also created, and has continued to expand, a glossary of key terms for each division and a style guide for the 13 agencywide languages.

Also, to ensure accuracy and a high-quality on all of our public-facing translated documents, in-house translations, other than those completed by the professional translators in the Language Services unit, are not permitted.

3. Notification of Free Interpretation Signage

a. How will you produce or post public notices regarding your agency's provision of free language assistance?

All of our public-facing clinics and sites have a poster that states "You have the right to free interpretation services" in 18 languages visibly posted (see **Appendix E**). Each public-facing site also has bilingual and multilingual signs posted based on that site's language list and eligible population that provide direction to clients and services offered to them at that particular site. The Language Access team works with the agency's programs to inform and provide agency resources to not only be able to identify New Yorkers with LEP, but also to be able to assist

them to the best of our ability. Additionally, every agency flyer or document that advertises our services or events, on any platform, promotes our free interpretation services and the fact that we provide services without regard to a person's immigration status.

#### 4. Language Access in Agency Communications

The language lists created by the language access team, using census and programmatic data, inform the agency and each program's outreach efforts. Based on these lists, the agency translates agency communications, including outreach events, hearings, websites, social media, online transactions, or press releases into languages spoken by at least 5 percent or 1 percent of eligible or active population in NYC. Our marketing and social media team also develop and advertise media campaigns in different languages on radio, television and various social media platforms and our Publications team promotes on flyers and other event promotion materials that interpretation services can be requested for events. Please see **Section III** for the immense work the agency's Communications team has done during the COVID-19 pandemic especially with regards with peoples with LEP.

#### 5. Plain Language

Any agency program that requests a translation of a document must first send the document to the Publications unit. The Publications team then incorporates the following plain language principles during their review process:

- Write for your audience
- Organize the information
- Choose your words carefully
- Be concise
- Keep it conversational
- Design for reading
- Follow web standards
- Test your assumptions

The NYC Health Department recognizes that an English source document should be clear and at a proper literacy level in order for the translation vendor to provide a quality and appropriate translation.

The Publications unit also provides proper protocols to ensure that programs are aware of these principles when creating agency materials.

#### 6. Agency's Emergency Preparedness and Response

The goal of the NYC Office of Emergency Preparedness and Response (OEPR) team, under the NYC Health Department, is to prevent, protect against, respond to and increase NYC's ability to recover from the public health impacts of any emergencies. OEPR understands that as a City where 1 in 4 people don't speak English very well it is imperative that the needs of people with LEP be integrated into the agency's emergency response formal plans or protocols. OEPR has been consulting with the Language Services unit for years to create and (re)evaluate language access protocols for use during and after a public health emergency. The protocols we have in

place to ensure meaningful language access for services and communications during public health emergencies have been very useful during the COVID-19 pandemic and continue to serve the agency's recovery efforts.

In early January 2020, the NYC Health Department activated its Incident Command System (ICS) to respond to the COVID-19 emerging pandemic. This activation prompted the activation of the Office of External Affairs staff which include the four Communications units (the Language Services unit falls under this unit), the Intergovernmental Affairs unit, the Information Support unit, Community Affairs, and the Press Office. OEA has been central to agency's dissemination of vital COVID-19 information to New Yorkers, including the diverse LEP communities of NYC.

Fortunately, the existing language services infrastructure allowed the agency to respond quickly and disseminate multilingual content to New Yorkers. Annual language access trainings have been conducted for all front-line agency staff, including in OEPR, on not only how to deliver culturally and linguistically appropriate services to LEP clients and what resources are available to them, especially during a public health emergency, but also on the processes and mechanism set in place for a faster delivery of services.

As noted earlier, we have existing contracts with vendors for telephonic and in-person interpretation as well as vendors for translations and translations review. Additionally, we have in-house linguistic talent with two Spanish translators and one Chinese translator. The emergency activation enabled the Language Services team to not only increase our contract ceiling amounts with our interpretation and translation vendors, but also to choose the vendors with the fastest turnaround times and best quality of services. As a result, translations of essential COVID-19 informational documents and guidelines were initially translated into the City's top 13 languages often with a turnaround time of one day. Upon consultation with other agencies, such as the Mayor's Office of Immigrant Affairs and their community outreach team, the agency expanded the translation of key COVID-19 documents into 26 languages thereby expanding our reach to most LEP New Yorkers. These translated documents and information were then distributed by our community outreach teams and posted on our agency's website and included in our social media platforms.

Our Digital Communications unit has made our agency website and social media platforms accessible to the LEP populations in NYC by providing custom translation information in the top 13 languages. The Marketing unit has also led the creative development, production, printing, release, and placement of over 35 large-scale media campaigns in multiple languages. Additionally, our Speaker's Bureau trained staff with expertise on the subject matter to present on COVID-19 related topics and answer questions New Yorkers had in multiple languages.

The Communications unit continues to support the agency's COVID-19 response efforts especially with the distribution of vaccinations through NYC Health Department Vaccine Hubs. We have and continue to support the creation and distribution of any materials necessary to facilitate delivery of services at these sites including posters, banners, palm cards, registration forms, "I Speak" cards and others. Vaccine Hubs have also utilized our existing language services contracts for in-person and VRI interpretation services. This is in addition to utilizing the hundreds of bilingual staff working at these sites.

## VI. Training

The Health Department will provide the following **mandatory trainings** to help staff comply with agency policies and provide meaningful access to services for LEP New Yorkers.

- a. **Introduction to language access for new hires:** New-hire orientation covers:
  1. The Health Department's Language Access Policy
  2. Required language services, as defined above
  3. The Office of External Affairs Language Services unit
  
- b. **Annual language access training:** With support from the Language Services unit each division will provide annual trainings for the following staff:
  1. Staff who have the potential to interact with LEP individuals
  2. Staff who arrange for language services
  3. Program directors

The annual training includes details on how to access language services, how to request written translations of vital documents, request interpretation services and provide services in a non-English language.

## VII. Record Keeping and Evaluation

### A. *How will you ensure the quality of your language access services?*

The Health Department has quality assurance processes in place to ensure the quality of our language access services. In terms of interpretation services, the Language Services unit has monthly check-in meetings with our interpretation vendors. The meetings are designed to not only provide feedback to the vendors, submitted to us by our programs (see **Language Access Complaints** section), but also to find creative and practical solutions to complaints filed by them.

The annual medical and standard fluency assessment coordinated by the Language Access coordinator also ensures that our staff provide a level of interpretation services equal to that provided to our English-speaking clients.

The Language Services unit has instituted a review process that includes reviewing documents to make sure they abide by plain language guidelines and using review vendors to review all important and vital documents. Furthermore, as previously stated, in-house translations by any agency program are not allowed.

The agency will also foster high-quality language access services by expanding the existing agency glossary of divisional key terms so that translations can be consistent and by reviewing the Implementation Plan on an annual basis to assess the consistency of the plan's goals with agency resources and client needs.

### B. *How will you maintain records of the language services your agency provides?*

The Language Services unit receives monthly reports from its translation and interpretation vendors. Additionally, agency programs submit programmatic data of services provided to LEP clients. These reports and programmatic data allow the agency to monitor and assess the language access services it is providing and be able to identify any gaps in access.

Staff who pass the fluency assessment will have a certification in that language on our employee website, Employee Data Bank, EDB. This will allow facility managers and leadership to identify fluent staff interpreters to provide services to LEP clients.

The Language Services unit also keeps records of new-hire orientation and annual staff trainings and of all the programs' translated vital documents.

### Evaluation

The language access coordinators will evaluate the progress of the language access implementation plan by:

- Surveying staff on their understanding of language access procedures. The language access coordinator will conduct random surveys on an annual basis
- Conducting client satisfaction surveys of LEP clients. Several divisions across the agency already conduct client satisfaction surveys as a way to evaluate service quality. The language access coordinator will work with these divisions to locate the survey responses of LEP clients
- Requesting annual language services and access data from agency programs. This will allow us to identify any gaps in services to LEP New Yorkers.

The language access coordinator will compile the data from these various sources and will include a summary of these evaluation results in the annual updates of the Language Access Implementation Plan.

## **VIII. Resource Analysis and Planning**

### *A. How will you leverage current agency resources to implement your plan?*

The agency approved its language access policy in 2016. As a result, some agency resources have already been allocated to reduce language barriers. A central translation fund was created to fund program interpretation and translation services. This fund is also used to fund the staff fluency assessment and for the creation of language access toolkit materials like the free interpretation services poster, language ID sheet and multilingual booklets for clients. The agency encumbered over \$1,336,400 for translations and translation reviews and over \$1.02 million for interpretation services. The Language Services unit will also continue to coordinate with language access units from other City agencies to learn best practices and provide guidance.

The agency is aware of the constant demographic changes in New York City. This is the reason it goes above and beyond providing language services in the city's designated citywide languages. As



directed by the Language Access Policy, the language access coordinator works with agency programs to update their language services data. This helps inform the program on their translation and interpretation needs. If the program is not recording or tracking that data, the language access coordinator works with the program in developing a system for tracking such data.

## **IX. Outreach and Public Awareness of Language Access Services**

The agency will provide information about language services to public, media, community leaders and LEP residents. The agency will also inform the public about language access services by implementing the following protocols:

- In translated flyers and promotional materials about public events, mentioning that interpretation services are available.
- Providing listings in 311 and the agency's Call Center for all agency programs that offer language access services.
- Reaching out to local organizations that represent LEP residents within target populations with assistance from the Language Services unit, Office of Intergovernmental Affairs, and Community Affairs.
- Advising that language services are available by making visible posters and flyers at the agency's public spaces.

The agency will implement outreach for services on a rolling basis, beginning after a service's staff members have received training in assisting LEP clients with language access services.

## **X. Language Access Complaints**

Complaints about language access received through 311 are automatically upload to our correspondence tracking system. Complaints are routed to the language access manager and language access coordinator. The language access team has also created a shared excel spreadsheet where program staff can describe any deficiencies in interpretation services with LanguageLine. Language access trainings and liaison meetings are also ways language access complaints are communicated to the language access team. These complaints are then discussed with the vendor at monthly meetings.

## **XI. Implementation Plan Logistics**

The Language Services unit is comprised of the language access manager, the language access coordinator, a language access trainer, a translations manager, a Spanish translator and a Chinese translator. Given the myriad of services the agency provides to New Yorkers and the

size of the Language Services unit, it is essential that the unit continue to work closely with bureaus' language access liaisons and their respective leadership to build the infrastructure needed to provide more equitable services to LEP New Yorkers.

Over the next few years, we expect to be able to expand the unit to include a full-time Director and more in-house full-time Translators as well as a Project Manager to support the provision of increased number of translation and interpretation service requests.

Monthly and quarterly liaison meetings are designed with the goal of supporting and tracking a bureau's progress towards completing the Local Law 30 requirements. We work with bureaus to implement quarterly language access goals and those goals are monitored regularly for progress or possible re-evaluation. We plan on making progress on the goals below for the next fiscal year.

**FY2022-FY2025**

The Language Services Unit plans to:

Expand the Language Services unit by hiring a full-time Director and additional staff to better serve LEP New Yorkers by end of FY22

Increase the Agency's centralized Language Services' budget to be able to increase the number of written translations and interpretation services it is able to provide by the end of FY22. Evaluate that budget in FYs 23-25.

Language Access Goal	Milestones	Responsible staff	Deadline
Expand the Language Services unit by hiring a full-time Director and additional staff to better serve LEP New Yorkers by end of FY22	Hire director by end of FY22  Hire additional staff by end of FY22	Assistant Commissioner for Communications	End of FY22
Increase the Agency's centralized Language Services' budget to be able to increase the number of written translations and interpretation services it is able to provide by the end of FY22. Evaluate that budget in FYs 23-25	FY22	Assistant Commissioner of Communications	FY23-FY25

Implement an agency-wide survey to measure the agency's knowledge of language access policy goals and each division's progress on metrics implementation	Completion: Create comprehensive survey for each division that measures progress of LL30 metrics implementation – FY22	Language Access Team	End of FY25
Complete implementation of the Language Services HealthNet Training	Finalize HealthNet Training Course – FY22	Language Access Coordinator	End of FY22

## Appendix A. Top Languages Spoken by New York City's Limited English Proficient Population

Emergency communications, legal notices and administration priority communications intended for all New Yorkers will be translated into any languages spoken by at least one percent of New York City's Limited English Proficiency population. The Publications and Language Services unit will review this list annually and update it as needed.

New York City		
	Language	% of LEP Population
1	Spanish	49.54
2	Russian	6.53
3	Cantonese	3.09
4	Haitian Creole*	2.70
5	Korean	2.57
6	Bengali	2.50
7	Mandarin	2.47
8	Italian	1.75
9	Polish	1.61
10	Yiddish	1.50
11	Arabic	1.43
12	French	1.24
13	Urdu	1.04

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

**Appendix B. Language Lists for the Nurse-Family Partnership (NFP) program. Active clients denoted in the first list are current clients receiving services whereas eligible population consists of potential clients who live in the program’s service area.**

<b>Nurse-Family Partnership (Active Clients)</b>		
	<b>Language</b>	<b>% of LEP Population</b>
1	Spanish	78.59
2	French	7.07
3	Haitian Creole	3.64
4	Bengali	3.03

*Source: Program data for current active NFP clients as of 3/31/16, including “Other” languages.*

<b>Nurse-Family Partnership (Eligible Population)</b>	
<b>Languages</b>	<b>% of LEP Population</b>
Spanish	74.13
Chinese (TC and SC)	4.17
Bengali	3.13
Haitian Creole	1.91
French	1.67
Korean	1.15
Kru	1.03
Arabic	1.06

*Source: Combined ACS data for the following CDs: BK 3, 4, 16, 17; BX 1, 2, 3, 4, 5, 6, 7, 9; MH 9, 10, 11; QN 2, 3, 8; SI*

Appendix C. Language ID Sheet.



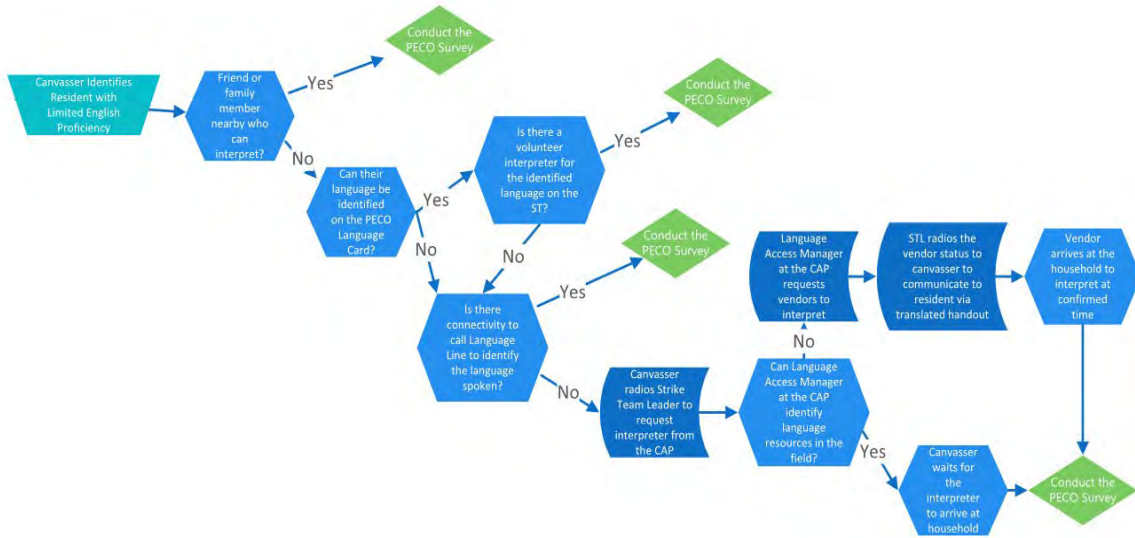
# Language ID Sheet

<p><b>Español</b> Spanish</p> <p>Tiene derecho a recibir servicios de idiomas gratuitos. Señale su idioma y llamaremos a un intérprete.</p>	<p><b>Русский</b> Russian</p> <p>У вас есть право на бесплатные языковые услуги. Укажите ваш язык, и мы вызовем вам переводчика.</p>
<p><b>廣東話/普通話</b> Cantonese/Mandarin</p> <p>您有權申請免費的語言服務。請選擇您使用的語言，以便我們為您指派口譯人員。</p>	<p><b>Kreyòl ayisyen</b> Haitian Creole</p> <p>Ou gen dwa pou resevwa sèvis lang gratis. Lonje dwèt ou sou lang ou pale a epi n ap rete yon entèprèt pou ou.</p>
<p><b>한국어</b> Korean</p> <p>여러분은 무료 언어 서비스를 받을 권리가 있습니다. 사용하는 언어를 손가락으로 가리키시면 도와줄 통역사를 부르겠습니다.</p>	<p><b>বাংলা</b> Bengali</p> <p>আপনার বিনামূল্যে ভাষা পরিষেবা পাওয়ার অধিকার আছে। আপনি কোন ভাষায় কথা বলেন তা জানুন, আমরা আপনার কথা বোঝার জন্যে চেষ্টা করব।</p>
<p><b>普通话/广东话</b> Mandarin/Cantonese</p> <p>您有权利享受免费的语言服务。请选择您使用的语言，我们将为您提供口译人员。</p>	<p><b>Itallano</b> Italian</p> <p>Ha il diritto di ricevere servizi linguistici gratuiti. Indica la tua lingua e sarà nostra premura contattare un interprete.</p>
<p><b>Polski</b> Polish</p> <p>Każdy ma prawo do korzystania z bezpłatnych usług językowych. Wskaż język, a my wywołamy tłumacza.</p>	<p><b>יידיש</b> Yiddish</p> <p>איר האט די רעכט צו באקומען פארשטאנדלעכע שפראך דערשטעלונגען. צייגט אונס וועלכע שפראך איר שפראכט און מיר וועלן אים אונס צוזאמענברענגען פאר איר.</p>
<p><b>العربية</b> Arabic</p> <p>لديك الحق في الحصول على خدمات اللغة المجانية. يرجى الإشارة إلى لغتك ومترجمنا مع مترجم تجري للمساعدة.</p>	<p><b>Français</b> French</p> <p>Vous avez droit à des services linguistiques gratuits. Indiquez votre langue et nous vous mettrons en relation avec un interprète.</p>
<p><b>اردو</b> Urdu</p> <p>آپ کو مفت لسانی خدمات کا حق حاصل ہے۔ اپنی زبان بتائیے اور ہم آپ کی زبان سے لسانی ترجمان فراہم کریں گے۔</p>	<p><b>Ελληνικά</b> Greek</p> <p>Δικαιούστε δωρεάν υπηρεσίες διαμεγέλειας. Δείξτε μας τη γλώσσα σας και θα καλέσουμε έναν διαμεγέτλη για να σας βοηθήσει.</p>
<p><b>Tagalog</b> Tagalog</p> <p>May karapatan ka sa mga libreng serbisyo sa wika. Ituro ang iyong wika at tatawag kami ng Interpreter para sa iyo.</p>	<p><b>Shqip</b> Albanian</p> <p>Kenë të drejtën e shërbimeve gjuhësore falas. Zgjithni gjuhën tuaj dhe ne do të telefonojmë një përkthyes për ju.</p>
<p><b>ਪੰਜਾਬੀ</b> Punjabi</p> <p>ਤੁਹਾਨੂੰ ਮੁਫਤ ਭਾਸ਼ਾ ਸੇਵਾਵਾਂ ਦਾ ਹੱਕ ਹੈ। ਅਪਣੀ ਭਾਸ਼ਾ ਦੱਸੋ ਅਤੇ ਅਸੀਂ ਤੁਹਾਡੇ ਲਈ ਸਹੀ ਦੁਆਰੀਏ ਨੂੰ ਕਾਲ ਕਰਾਂਗੇ।</p>	<p><b>Português Europeu</b> Portuguese</p> <p>Tem direito a serviços linguísticos gratuitos. Indique o seu idioma e será chamado um intérprete para si.</p>




**Appendix D. Post Emergency Canvassing Operation Language Access Plan to be used during and after a city emergency.**

**PECO Language Access Plan**






Appendix E. You Have the Right to *free* Language Services posters are displayed in all of our public-facing sites throughout New York City.



**한국어** **বাংলা** **English**  
**Español** **РУССКИЙ**

**You have the right to *free* language services.**  
**Tiene derecho a recibir servicios de idiomas *gratuitos*.**  
**У вас есть право на *бесплатные* языковые услуги.**  
**您有權申請免費的語言服務。**  
**Ou gen dwa pou resevwa sèvis lang *gratis*.**  
**여러분은 무료 언어 서비스를 받을 권리가 있습니다.**  
**আপনার *বিনামূল্যে* ভাষা পরিষেবা পাওয়ার অধিকার আছে।**  
**您有权利享受免费的语言服务。**  
**Hai il diritto di ricevere servizi linguistici *gratuiti*.**  
**Każdy ma prawo do korzystania z *bezpłatnych* usług językowych.**  
**איר האט די רעכט צו באקומען *אומזיסטע* שפראך סערוויסעס.**  
**لديك الحق في الحصول على خدمات اللغات المجانية.**  
**Vous avez droit à des services linguistiques *gratuits*.**  
**آپ کو مفت لسانی خدمات کا حق حاصل ہے۔**  
**Δικαιούστε δωρεάν υπηρεσίες διερμηνείας.**  
**May karapatan ka sa mga *libreng* serbisyo sa wika.**  
**Keni të drejtën e shërbimeve gjuhësore *falas*.**  
**ਤੁਹਾਨੂੰ ਮੁਫਤ ਭਾਸ਼ਾ ਸੇਵਾਵਾਂ ਦਾ ਹੱਕ ਹੈ।**  
**あなたは無料の言語サービスへのアクセス権があります。**





# Language Access Implementation Plan

March 2021

## **I. Agency and Language Access Coordinator**

New York City Department of Probation  
Phyllis R. DeLisio  
Language Access Coordinator (LAC)  
Assistant to the Commissioner  
Diversity and EEO Officer  
Disability Rights Manager  
Disability Service Facilitator

## **II. Agency Mission and Background**

The New York City Department of Probation (DOP) helps build stronger and safer communities by working with and supervising individuals on probation, fostering positive change in their decision-making and behavior, and expanding opportunities for them to move out of the criminal and juvenile justice systems through meaningful education, employment, health services, family engagement and civic participation. DOP has offices in every borough across NYC and provides four core services –pre-sentence investigations, intake, diversion and probation supervision. In summary, DOP ensures that people who enter our system are supervised according to their risk level and receive the support and services they need to abide by the law and be an asset to their communities.

### **Direct Services**

#### **Overview**

In 2020, over 711 probation officers supervised more than 13,313 adults and 530 juvenile clients placed on probation by judges in the Supreme, Criminal and Family Courts.

The supervision of those clients, who have limited English Proficiency (LEP clients), by Probation Officers is supported through language access contracted vendor services (face-to-face and telephonic interpreter services) at borough-wide agency locations, client residences, service providers and at kiosk reporting centers.

Probation Officers prepare tens of thousands of detailed background reports to assist judges in determining appropriate sentences for offenders.

## Adult Services

### Investigations

State law mandates that a pre-sentence investigation (PSI) be prepared and submitted to the court prior to sentencing on most felony convictions and on certain misdemeanors. In preparing the PSI, DOP interviews the victim to assess the extent of physical, psychological, or financial injury. After a thorough investigation of the client, including the individual's criminal, social, scholastic and employment history, as well as an examination of alcohol and substance abuse, DOP makes a sentencing recommendation to the judge. In addition to helping judges decide on an appropriate sentence, the PSI affords officers the opportunity to recommend appropriate conditions for clients placed on probation.

#### QUICK Fact:

DOP Investigations Units provide the courts with important information about the crime, victim and defendant. The units help the court to identify the risk of recidivism and the needs of the defendant such as drug treatment or help with securing employment. The court uses the report to help decide the best sentence to give to the defendant.

### Supervision

After a conviction at trial or a plea of guilty, an eligible defendant may be placed on probation by a judge for a specific time in lieu of incarceration. Probation sentences range from one or three years for a misdemeanor and up to ten years for a felony. Our newly restructured system uses a collaborative team approach to supervision that includes counseling and referrals to community resources for specific treatment needs. The supervision curriculum includes cognitive-based group instruction for those at highest risk of recidivism among our population. DOP makes sure that the client meets any conditions set by the judge including restitution to victims, community service, and drug treatment. The goal is to encourage the client to become a law-abiding citizen with a successful life out of the criminal justice system. DOP utilizes technological enhancements to augment supervision and to improve data collection and retention. Included in this initiative is the use of kiosk reporting for our low risk offenders.

#### QUICK Fact:

Probation is a sentence given by a judge in lieu of jail or prison. Clients on probation must regularly report to their officers and obey all court orders. Adult supervision can last from one to ten years.

## Juvenile Services

### Juvenile Services Summary

DOP is committed to promoting public safety by reducing anti-social activity among juveniles. We do this through problem identification, assessment, and by addressing the individual needs that contribute to criminality. Interventions consist of interrupting cycles of dysfunctional (anti-social) behavior while supporting positive attempts to achieve better outcomes. In conjunction with schools, community-based organizations, and others within the juvenile justice system, we work with children and their families to advance law-abiding behavior in an atmosphere that encourages responsibility and accountability.

#### QUICK Fact:

The purpose of Juvenile Intake is to determine whether the case should be sent to court or not. Cases not sent to court are required to follow probation instructions until successfully resolved.

### Investigations

After a finding of criminal responsibility, and, if ordered by the court, the department will conduct investigations to assist the court in making the best decision for the youth. Family Court Investigation Reports (I&Rs) generally focus on the needs, strengths and behavior of the juvenile and the functioning of the family. This is accomplished through interviews with all parties involved in the case and in some instances, home visits and visits to the child's school. Additionally, an evaluation of the youth's physical and mental health as well as reports from service providers involved with the youth and/or family are obtained to include in the I&R. A recommendation is then made with consideration to both the best interest of the child and the safety of the community. In some cases, placement of the child is recommended.

DOP also completes investigations relating to custody, visitation, family offenses and adoption issues to assist the Family Court in making appropriate determinations in these complex and sensitive matters.

### Supervision

Juvenile delinquents can be placed under the supervision of Probation for up to two years. The youth is assigned to a Probation Officer who sets up a reporting schedule and a treatment plan based on the needs of the youth and his or her family. Probation Officers can refer a youngster to a community-based treatment provider and are also responsible for monitoring the probationer's adjustment at home, at school and in the community to ensure compliance with the conditions of probation. Home visits are a staple component of juvenile supervision. When necessary, a violation of probation is filed with the court and the youth is returned to the judicial system.

#### QUICK Fact:

Supervision includes a treatment plan, regular reporting, and referrals to community-based support programs. Adjustment in the home, in school and the community is monitored.

## III. Agency Language Access Policy and Goals

The Department is required by law to conduct Pre-Sentence/Dispositional Investigations and to supervise individuals sentenced to probation by the court. For our agency's mission to be realized it is essential that our officers communicate clearly and effectively with the clients they supervise. This is critically important as most discussions with our clients address issues that could impact one's freedom. It is DOP's goal to ensure that a client's primary language is never an obstacle for them to achieve a successful life outside the criminal justice system. DOP is fully committed to providing all clients with clear communication, in their primary language, through contracted interpreter services. All language access services are provided to our clients free of charge.

With our younger population, Probation Officers may need to communicate with the parents of our clients, who may not speak English. Language access services are provided during these interactions as well.

It is DOP's policy to always provide all LEP clients with telephonic or in person language access services from contracted certified interpreters. During field visits, Probation Officers are equipped with cell phones for the provision of telephonic language access services to clients during home/field visits. Should this not be an option due to poor cell phone reception, a Probation Officer, family member, or friend who speaks the primary language of the client may assist with communication during the field visit. Following this visit and during

the very next office visit, the conversation that was held during the field visit is verified through a qualified interpreter.

The Department's kiosk reporting system is used by clients deemed to be low risk of offending. The kiosk has easy to follow instructions offered in 4 languages: English, Spanish, Chinese and Russian. The closing of our offices due to COVID, created a special circumstance for kiosk usage in CY 2020. For the period of January through March 2020, the kiosk was used by LEP clients as follows:

Spanish speaking	691
Chinese speaking	118
Russian speaking	42

For a client who speaks a primary language other than the 4 languages cited above, the reporting requirement is met through scheduled meetings with the assigned Probation Officer and contracted language access services.

In compliance with Local Law 30, should DOP hold an event that is public facing, documents and interpreter services are made available via contracted vendors in the top 10 languages.

DOP also strives to effectively determine the language access needs of the LEP population attending an event through the provision of the LAC's phone number on advertising materials which allows LEP individuals to request language access services.

Every DOP client is assigned to one specific Probation Officer. The officer works diligently to engage with the client and develop a strong rapport. For LEP clients, the officers utilize telephonic and in-person contracted interpreter services to achieve the relational connection needed to successfully supervise clients in the achievement of the goals set during supervision.

#### **IV. Agency Language Access Accomplishments and Progress on Goals from Previous LAIP**

DOP has been providing language access services to our clients for over 24 years through contracted vendors. These services include telephonic translation and in-person interpreter services in more than 100 languages (including American Sign Language). DOP continues to use citywide contracts to ensure reliable and accurate interpretation services for all languages spoken by our clients. In 2020, DOP provided 75,554 minutes of telephonic language access services in 34 languages to LEP clients.

Since the last 2018 LAIP:

DOP's adult client population has decreased from 27,000 to 13,000 individuals and the juvenile client population has decreased from 2,200 to 500. In 2017, DOP spent \$47,000 on contracted language access services and in 2020, \$61,000 was spent for the provision of language access services. Despite a significant decrease in the number of clients being supervised, DOP spent an additional \$14,000 for contracted language access services. Although rising costs may be attributable to a portion of the higher costs, the increase in spending reflects DOP's ongoing commitment to support the provision of language access services to our clients.

The Director of Press and Communications, who receives all requests for flyers to advertise DOP events, works collaboratively with the LAC to ensure that all Local Law 30 requirements are met in the development of the flyers. All flyers are created in the primary languages most spoken by the clients who are attending the DOP event.

The Director of Press and Communications, (as well as the General Counsel), attended training on writing with plain language and, when applicable, apply plain language principles to written materials distributed to clients and the public.

All advertising material for agency events include the phone number of the LAC who responds to any questions from LEP individuals through contracted telephonic services.

DOP has updated its policy/procedure notice and training curriculum with the requirements of Local Law 30.

DOP's LAC attends all meetings and trainings offered by MOIA and other agency partners to obtain updated guidance and resources on how to provide meaningful language access to DOP's LEP clients.

Since 2017, DOP has provided Probation Officers with 35 documents translated into the primary languages of LEP clients.

MOIA's celebration of International Mother Language Day 2020 was shared with all staff via the agency's intranet to educate staff about important city programs, to honor the languages of our communities and to celebrate the linguistic diversity of our city.

Due to the pandemic, DOP did not hire Probation Officers in 2020.

During the pandemic, to ensure continuity in the provision of language access services to all LEP clients, DOP provided cell phones and/or laptops to most officers. Some officers, deemed essential, went into the office to contact clients via their office computers. Through different funding sources, many of our clients were provided with a cell phone or laptop to ensure ongoing communication with their assigned Probation Officer.



## V. LEP Population Assessment

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

#### Factor 1

DOP serves a defined population of individuals sentenced by a judge to serve court ordered supervision by Probation Officers. DOP captures in the primary language of each client in our case management system. Currently, 3,802 of DOP’s clients speak with limited English proficiency. This is 44% of our total client population compared to the approximately 18% of New York City residents (1.6 million adults) who do not speak English proficiently.

The top 10 languages spoken by DOP’s LEP clients in 2020 were Spanish, Mandarin/Cantonese, Russian, Arabic, Korean, Bengali, Haitian Creole, Bengali, Punjabi, French, and Urdu. The primary languages of DOP’s LEP individuals differ slightly from the top 10 languages under Local Law 30: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French and Polish.

#### Factor 2

Through DOP’s case management system, the agency maintains data on the frequency with which each client meets with their assigned Probation Officer as well as the services provided to the client. The frequency of contact is determined by the level of supervision deemed necessary to ensure the client’s success in reaching targeted goals. The goal of Probation supervision is to reduce recidivism through a balanced between risk management and risk reduction. Probation Supervision is the foundation of this balance as Probation Officers use accountability measures and support to generate behavioral change. For clients with the highest risk of recidivism, the minimum required frequency of contact is 6 collateral contacts and 1 home contact per month. For clients with high risk of recidivism, the minimum required frequency of contact with their assigned Probation Officer is one in-person contact per week, six collateral contacts per quarter, and one positive home contact per month. For clients with medium risk, the minimum required frequency of contact is two Probation Client contacts and two collateral contacts per month. For clients with low risk, the minimum frequency of contact is one contact per month.

#### Factor 3

DOP provides critical services to clients sentenced to Probation by the courts. DOP ensures that its clients are supervised according to their risk level and that they receive the full support and services needed to abide by the law and to become an asset to their communities. Language access services are critical to the

success of our LEP clients. A lack of clear communication between a Probation Officer and client could result in a failure to meet critical milestones that may lead to the client losing their freedom. Therefore, DOP staff are trained and reminded annually, via a memorandum from the Commissioner, that all staff is accountable for ensuring that a client's primary language is never an obstacle to a successful life outside the criminal justice system. DOP is fully committed to providing all clients with clear communication through contracted language access services which are provided free of charge.

#### Factor 4

DOP's case management system captures the language of every client so every staff person that contacts the client knows when there is a need for language access services. DOP uses the data captured through the case management system to determine the languages spoken by clients in each borough office so television ads and flyers can be targeted to the languages most spoken by the clients in each individual waiting room. DOP has also used data on the primary languages of our clients to assign Probation Officers based on their ability to speak the language most spoken by our clients in a particular office. DOP also reviews invoices from language access services to ensure that appropriate funding is available to meet the ongoing needs of its LEP clients. In 2020, DOP spent \$61,000 on Language Line Telephonic Services, in-person interpretation and sign language services. Approximately \$100 was spent on document translation. This reflects DOP's commitment to equity in the provision of supervision and services, so all clients, despite their primary language, are afforded the same opportunity to lead successful lives outside the criminal justice system.

DOP works to close the gaps in the provision of language access through all the above plus implementation of customer service surveys and prompt response to any complaints related to the provision of language access services.

Based on the above analysis, the plan outlines the language needs of the agency and assesses whether some, or all, of its direct public services should be provided in a language or languages supplemental to the designated citywide languages.

## **VI. Provision of Language Access Services**

### **Translation Services**

All Probation Officers are trained to provide LEP clients with documents in their primary language. The officers know where to find the agency's repository of translated forms/documents stored on the agency's intranet under the Language Access link. If a document is not available in a new client's primary language, the Probation Officer will request that the document is provided in the primary language of the new client. The LAC will ensure that the document is translated to meet the

client's need and is stored in the repository for any other LEP client who also speaks this language.

Currently, the agency uses Accurate Communications or a WMBE vendor for the translation of forms/documents/information. To date, DOP has provided Probation Officers with 35 documents translated into various primary languages of LEP clients.

### **Interpretation Services**

When an individual is sentenced to probation by the court, they are sent directly to a DOP office to begin their supervision. Upon arrival, the individual is met by a greeter, trained to assist all clients. The greeter uses an I SPEAK card to discern the primary language of the client. The greeter, then brings the client to an Intake Officer, who interviews the client via telephonic interpreter service and captures the client's primary language. The primary language of the client is captured in DOP's case management system. The LEP client is then assigned to their Supervision Probation Officer, who engages directly with the client on a regular basis, ensuring that the client's primary language needs are continuously met through contracted language access services and that the client receives relevant documents in their primary language. This is done to ensure clear understanding of expectations, increasing the likelihood of client compliance with court orders and success in finishing their probation term.

### **Language Access in Agency Communications**

On the rare occasion that the agency holds an event that includes members of the public and DOP clients, all documents advertising the event are provided in the primary languages of the clients supervised in the borough where the event will take place. Additionally, advertisements for the event include the LAC's telephone number for the public to call for assistance with languages other than English. All Probation officers are equipped with cellphones, so they have ongoing access to a telephonic service provider during the event to assist individuals in their primary language. If deemed necessary, an in-person interpreter is provided at the event.

DOP's LAC utilizes the billing records of language access service providers, DOP's case management language data, as well as data gathered from borough leadership to target the primary languages spoken at each particular DOP location to ensure inclusive community engagement for our LEP clients. This data informs the languages in which we distribute written materials to clients in each individual waiting room and, with regard to language provisions in digital communications.

### **Plain Language**

The Director of Press and Communications, the LAC and the General Counsel attended training in plain language. They ensure that plain language principles

are applied to written materials distributed to DOP clients and the public. The Director of Press gives final approval to all flyers and documents advertising DOP events to ensure that plain language principles and LL30 requirements are adhered with.

## **Policies and Procedures**

Policy and Procedure Notice 25-01-17, the agency's policy statement on the provision of language access to LEP clients, is distributed to all new hires and is available on the agency's intranet. This notice advises all employees that telephonic and in-person interpreter services must be secured by the Probation Officer assigned to the LEP client.

Currently, DOP uses DCAS's contract with Language Line for the provision of telephonic interpreter services. The Probation Officer decides, on a case by case basis, whether the communication with the individual client is best handled by telephonic services or in person interpreter services. In general, most situations with a LEP client are handled with telephonic interpreter services. If the client needs sign language or the client is incarcerated and on video call, the Officer generally uses in person interpreter services. During any supervision interview, where the Probation Officer has reason to anticipate that a violation of the conditions of probation will be specifically discussed with a LEP client, the officer is required to secure in person interpreter services, whenever possible.

To request in person translation service, an electronic fill-in form is completed by the Probation Officer and forwarded to the agency's Help Desk for assignment of a ticket number, which creates a tracking system for all these requests and ensures full remedy. The fill-in form is reviewed for completeness and accuracy by the LAC who then ensures that the order is e-mailed to the certified vendor. The request is tracked until the vendor confirms that an in-person interpreter has been secured for the date and time requested. A confirmation is then sent to the Probation Officer who advises the client that an interpreter will be physically present to provide translation services.

On a quarterly basis, the LAC surveys approximately 12 borough managers plus the respective Adult and Juvenile Operations Deputy Commissioners to inquire whether there are critical documents that need to be translated into other languages. The borough managers canvass Probation Officers to determine which documents are essential for effective communication with their LEP clients. These essential forms/documents are forwarded to the LAC, who reviews the requests with the both the Operations and Administrative Deputy Commissioners. With the approval of Executive Management, the LAC has the documents translated by a contracted vendor in the required languages and in plain language. Currently, DOP has a contract with Accurate Communications for the translation of written documents. Upon securing the translated document from the vendor, the LAC sends the document via e-mail to all officers and respective management staff

and adds the newly translated document to the repository of translated documents on the intranet.

### **Notification of Free Interpretation Signage**

I SPEAK/Language Identification posters and cards are placed throughout all client waiting areas and in the offices of Probation Officers who meet with clients. These posters and cards are also available on the agency's intranet and can be shown to clients by the assigned Probation Officer's computer monitor. I SPEAK/Language Identification cards are also placed in visible areas at agency events for clients and the community. Most client waiting areas display a "Welcome Sign" in the many languages spoken by our clients.

### **Languages Beyond the Top 10**

Should a client's primary language not be available through the current telephonic or in person interpretation contracted services, the LAC contacts the agency's ACCO to secure a contracted vendor that does have an available interpreter who can assist the LEP client in their primary language. Languages beyond the top 10 are available to DOP's clients and members of the public.

### **Emergency Preparedness and Response**

During emergency situations, each Probation Officer contacts their assigned clients and directly communicates with them, including those categorized with limited English proficiency, via cell phone and/or laptop to convey important and time sensitive information. For clients who have limited English proficiency, the Officer utilizes telephonic interpreter services.

## **VII. Training**

Newly hired Probation officers and agency greeters are educated on the agency's commitment to provide LEP clients with communication in their primary language and on how to secure language translation services. During Academy training by professional trainers, Probation Officers are taught about the rights of LEP clients to receive oral and written communication in their primary language. The Academy curriculum covers the officers' personal responsibility to provide language assistance to LEP clients and their accountability to comply with policy/procedure notice 25-01-17. The officers receive a palm card with instruction on how to access telephonic services. Additionally, once the Officer graduates from the Academy and is assigned to a borough office, a supervisor re guides the newly hired officer on how to access both telephonic and in person interpreter services, how to best use the I SPEAK cards with LEP clients and how to access the repository of translated documents available on the intranet

Greeters, who welcome clients in the waiting room, receive customer service training that covers appropriate steps to take when greeting a client whose primary language is not English. "I SPEAK" cards are provided to these greeters and they are instructed to use the card and personally walk the client over to the Intake Officer or the Supervisory Probation Officer for assistance.

DOP's LAC works collaboratively with DOP's training division to ensure that all new employees interacting with clients are trained in how to effectively provide language access services along with cultural competence training. Refresher training on language access is provided to all staff every two years during Right to Know Training. DOP's LAC keeps DOP's Training Department abreast of any changes to Executive Orders and Local Laws that need to be incorporated in the language access curriculum.

DOP offers classroom training on Diversity and Inclusion Best Practices and this curriculum includes a piece on language access services. This course is available to all employees to attend, as so desired.

## **VIII. Record Keeping and Evaluation**

DOP's case management system captures the primary language of every client. The client's case record is reviewed at every meeting between the client and their assigned officer, which ensures that the language access needs of the client are always apparent. The client and officer also forge a strong rapport during supervision; the language access needs of each client quickly become known to the officer.

Through the case management system, DOP produces data on clients' primary languages in each borough office enabling the agency to provide flyers/documents in the languages most spoken by their clients in each individual borough office.

Senior staff across the agency's borough-wide offices, report any dissatisfaction with language access service providers to the LAC, who takes appropriate action to immediately remedy the problem. The Agency's ACCO is also notified of any problems with contracted language access service providers to report complaints to DCAS who holds the master contract.

The LAC reviews usage reports from language access providers, the clients' primary language selections from our kiosk reporting machines, as well as the primary languages captured through our case management system to make educated decisions on the language access needs of our clients and how best to meet these needs

DOP did conduct a satisfaction survey with our LEP clients, and clients reported that they were satisfied with the services provided. DOP will be conducting another survey in 2021- 2022.

## **IX. Resource and Analysis Planning**

The agency's language access initiatives are supported by a community of DOP employees that include, but are not limited to: the Agency Head, the Senior Policy Advisor to the Commissioner, the Director of Training, the Director of Press and Communications, Senior managers borough-wide, the General Counsel, the LAC and one clerical staff person.

These individuals continually include goals for the provision of language access in all program planning and work collaboratively to evaluate how well efforts to provide language access worked at each event to continually improve language access services.

DOP works diligently and collaboratively with DOITT to ensure that the agency website has the most up to date technology available to ensure that all individuals can access our website in their primary language. However, all documents are given to LEP clients by hand, via their assigned Officers, and are not available on the agency's website.

DOP's LAC continues to partner with MOIA and other agency partners to learn and share valuable information regarding new resources, new needs of LEP clients and best practices for the provision of language access services.

Given the continual increasing need for language access services, DOP will continue to appropriately adjust its budget and ensure that language access contracts meet the increased demand.

## **X. Outreach and Public Awareness**

The population that DOP serves is clients, sentenced to probation by a judge. DOP's clients are made aware of their rights to receive services in their primary language from the first moment that they step into our office and meet the agency's greeter who guides them right to an I SPEAK card.

On the rare occasion that the agency holds an event that includes members of the public, all documents advertising the event are provided in the primary languages of our clients in the borough where the event is taking place. Additionally, advertising for the event includes the telephone number of the LAC for the public to call if they need assistance in another language. This allows the individual to speak with the LAC via telephonic interpreter to request language access services at the event. All Probation officers are equipped with cellphones, to provide ongoing access to a telephonic interpreter during the event. If deemed necessary, an in-person interpreter is provided.

## XI. Language Access Complaints

The Commissioner’s Executive Assistant, who is also the LAC, has been tasked with handling 311 complaints regarding language access services. An excel spreadsheet is maintained by the LAC capturing data on language access complaints, the timeliness of the agency’s response and the remedy provided. At this time, the agency has not received any complaints regarding the provision of language access.

The agency’s website has the link through 311 that directs individuals to the site where complaints regarding language access services can be reported.

## XII. Implementation Plan Logistics

Each year, the Commissioner re-establishes the agency’s commitment to the provision of language access services to DOP’s LEP clients via a written memo to all staff that emphasizes ongoing support to the LAC in the agency’s efforts to implement the language access plan.

The General Counsel, Director of Communications and Press, Deputy Commissioner for Administration, Director of Training, LAC and borough leaders form the agency’s Language Access team. These individuals are held accountable, by the Commissioner, for ensuring that the provision of language access services to all LEP clients complies with all Executive Orders and Local Laws.

Under the direction of the Deputy Commissioner for Administration, DOP’s LAC is responsible for ensuring that all DOP staff who engage with clients have the tools and resources necessary to communicate effectively and in plain language with our LEP clients. The LAC looks for opportunities to provide videos, brochures and any other educational or informational materials in the languages most spoken by the clients at each DOP location. Probation Officers, borough managers and Executive Management determine which essential documents need to be translated to effectively communication with LEP clients.

The agency has the following goals for how to advance language access at the agency:

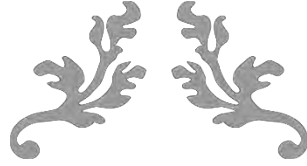
Language Access Goal	Responsible Staff	Deadline
Conduct a customer service survey to analyze the effectiveness of the provision of language access. The survey is offered in the 10 languages of our clients.	LAC and Borough Managers	2021 - 2022
Review and update the current training curriculum and policy, if needed.	LAC and Director of Training	Sept 2021
Update the agency’s website so that google translate is not the venue for language translation of the website	OIT staff and DOITT	March 2022 (dependent on DOITT)





# NYC Department of Probation Language Access Plan 2021

When feasible based on spacing, texts to clients sent through the case management system will include in a message that interpreter services are available through one's assigned Probation Officer	CE Administrator and Adult Operations staff	May 2021
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# DEPARTMENT OF RECORDS & INFORMATION SERVICES

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2021 Language Access Plan



# NYC DEPARTMENT OF RECORDS & INFORMATION SERVICES 2021 LANGUAGE ACCESS PLAN

## **I. Agency's Name and Agency's Language Access Coordinator:**

This Language Access Plan is for the Department of Records & Information Services. The name and title of the agency's Language Access Coordinator (LAC) is Gerald Rosero, Special Assistant to the Commissioner. This information can be found on the agency's website, please click on the following hyperlink: <https://www1.nyc.gov/site/records/about/language-access-plan.page>.

## **II. Agency Mission and Background**

The New York City Department of Records and Information Services (DORIS) operates the Municipal Archives, the Municipal Library and the Municipal Record Center. The agency fosters civic life by preserving and providing access to 243,000 cubic feet of historical and contemporary City government records, ensures that City records are properly maintained following professional archival and record management practices, develops and enforces record management policies and makes materials available to diverse communities both online and in person at the Municipal Library, Municipal Archives and Visitor Center.

**Agency's Direct Public Service Divisions:** There are three divisions that interact with the public, they are: The Municipal Library, Municipal Archives and Outreach/External Affairs. This language access plan is designed to provide language access services to these divisions as well as on the agency's website. By providing comprehensive language access services, any patron regardless of language capability may be able to utilize the agency's vast collections.

The Municipal Library provides reference services, oversees an online repository of reports from City agencies and operates a research library open to the public. The holdings are published documents that show the evolution of New York City government from the 19<sup>th</sup> Century to the present. The collection is comprised of reports, press releases, maps, indexes, and clippings. The Municipal Archives preserves and makes available New York City government's unpublished historical records dating from 1645 to the present. The collections include office records, manuscript material, still and moving images, ledgers, birth death and marriage records, maps, blueprints and sound recordings. The External Affairs division interfaces with the public via social media platforms, the agency website, lectures, exhibits and public program activities.

### **III. Agency Language Access Policy and Goals**

The Department of Records and Information Services has developed its Language Access Plan to guide the agency in serving patrons who have limited English language proficiency. This plan will ensure that all patrons and prospective patrons will have access to the department's resources regardless of the language they speak. The agency will publish the Language Access Plan on its website and update the plan as needed.

In accordance with the agency language access policy, the agency will:

- Provide language access services in the ten designated citywide languages.
- Provide telephonic interpretation services in at least 100 languages using the designated city vendor.
- Post multi-lingual signage regarding the availability of free telephonic interpretation services.
- Provide training to staff in the language access plan procedures.
- Update its Volunteer Language Bank.
- Develop reporting mechanisms to measure services delivered and complaints received.

The agency Language Access Coordinator (LAC) will monitor the plan with the assistance of the division directors. The LAC will hold semi-annual meetings with public facing staff of these divisions to discuss and implement changes and improvements to the Plan. The LAC will also distribute a reporting template which the division directors will use to submit semi-annual reports. The semi-annual report will document the number of language interpretation services requests made to the division, along with what language was requested.

### **IV. Agency Language Access Accomplishments and Progress on Goals from previous LAIP.**

Since LL 30's inception in 2017, the agency has implemented various procedures to ensure Language access services are available for any potential LEP patron, they include the following:

- Identifying an Agency Language Access Coordinator to develop and coordinate language access services.
- Contracting with qualified vendors to provide telephonic interpretation services as well as in person interpretation services.
- Training all public serving staff to properly identify LEP patrons and train them on how to use tools to identify the primary language of the LEP patron.

- Provided resources to staff to assist LEP patrons, I Speak cards, Dual handsets, multilingual posters.
- Updated website to include translation services in over 100 languages, contact information of the LAC, how to request in person interpretation services.
- Developed procedures to address language access complaints from 311, walk-ins, email etc.

Update on goals from previous LAIP

Goal	Update
May 2018 Update Agency Employee Language Access Bank	The Agency Language Access Bank has been updated.
May 2018 Select Language Access Vendors	The Agency has selected vendors to provide telephonic interpretation services and will select a new vendor for in-person interpretation services.
May 2018 Meet with Public serving staff to familiarize them on LL30 requirements and the LAIP.	Met with staff and provided training and overview on LL30 and the LAIP.
June 2018 Conduct Language Access Training for public facing staff.	Provided training on procedures to Identify LEP patrons, available Language Access resources, how to access LA services, document complaints, ensure multilingual posters are always visible.

**V. LEP Population Assessment**

As guided by Local Law 30, the department of Records & Information Services (DORIS) applies the “four factor analysis” utilized by the US Department of Justice to assess obligations for language access as the basis for its Language Access Plan.

**Factor 1 – The number or proportion of LEP persons in the eligible service population:**

As noted in section II, the Department has three divisions that have direct contact with the general public: The Municipal Archives, the Municipal Library and the External Affairs Group, as such the eligible service population, is the general population of New York City.

DORIS along with the Mayor' Office of Immigrant Affairs (MOIA) looked at citywide data to assess the number or proportion of LEP persons and their languages in the eligible service population for the services and information provided by this department. According to the analysis of the census data provided by the Department of City Planning, 49% of New Yorkers above the age of five speak a language other than English at home. Twenty three percent of New Yorkers are considered limited English proficient (LEP).

The Department applies the analysis undertaken by MOIA under local Law 30 to determine the top ten citywide languages based on data from the American Community Survey and data from the US Census. Based on this analysis, the ten citywide languages for FY21 are: Spanish, Chinese, Russian, Korean, Bengali, Haitian Creole, Arabic, Urdu, French, and Polish.

**Factor 2 – The frequency with which LEP individuals come into contact with the agency.**

It has been the agency's experience that LEP speakers of the above-mentioned languages are not our primary customer base.

In FY 2019, the Municipal Archives Division responded to 34,808 requests for copies of vital records and a total of 56,832 requests for information or research services (this figure includes the vitals, plus walk-ins, emails, etc.). None of these requests required language interpretation services. The Municipal Library received 3,299 requests for information or research service. No requests for language services was received. The External Affairs group hosts numerous exhibits and special programs throughout the year. They provide the opportunity for patrons to request in-person language interpretation services for any of these special events as posted on the website. <https://www1.nyc.gov/site/records/exhibits-education/exhibits-education.page>. No requests were made for this service.

The Department used 2019 figures for this report, due to the government closures which occurred because of the pandemic in 2020. Although in the past the agency has not received any requests for language services, the 2021 language access plan will build on the current capacity to provide language access services. This plan and/or future updates will incorporate data to evaluate the changes in language access needs of our customers, including identifying supplemental languages.

### **Factor 3 - The importance of benefit, service, information, or encounter to the LEP person.**

The Department strives to provide equal services to all our patrons no matter what language they speak. It has always been the Department of Records critical objective to increase the volume and availability of, and access to, public records and publications. The updated Language Plan will help the agency continue to respond promptly to all research requests no matter the language spoken by the requestor.

DORIS's public serving divisions provide important information and services to the public in a variety of ways including but not limited to:

- Copies of Vital Records, such as Birth Certificate and Death Certificates.
- Copies of Property Cards for buildings throughout the City.
- Copies of Historical Photos.
- Copies of Building Plans.
- Tax Photos for every property in New York City.
- Research Services for Municipal Records.

To ensure access to these important services available to all communities in New York City, DORIS through this Language Access plan describes how it will ensure patrons with limited English proficiency, have access to its information and services.

### **Factor 4 - Resources Available**

The Department will utilize certified translators and interpretation service providers to deliver Language Access Services. In the past the agency has contracted with VOIANCE a DCAS vendor to provide telephonic interpretation services in over 100 languages. Currently the department is evaluating vendors to provide document translation services and in-person interpretation services. As the agency plans for re-opening of in person services, these language interpretation service contracts will be updated accordingly. Our existing agency volunteer language bank, which currently can provide limited services in the following languages; Spanish, Cantonese, Italian, French, French Creole, Russian, Gujarati, Punjabi, and Hindi will be utilized to communicate with LEP individuals and to review translated materials.

Based on the above four factor analysis the agency has outlined its language access needs and has updated its language access plan to ensure all New Yorkers regardless of language ability are able to access and utilize the agency's resources.

## **VI. Provision of Language Access Services**

### Translation Services:

Mostly researchers and genealogist utilize the Library and Archives division; at this time, no Most Commonly Distributed (MCD) documents or forms have been identified for translation. The Department will monitor this provision and adjust as necessary. The Department will review its need to translate existing MCD forms, such as the Birth and Death Certificate Applications, as well as the photo licensing agreement/permission to publish forms. If a future need arises for document translation, then the Department will utilize a DCAS approved vendor to provide these services. Any translated materials by a contracted vendor will have a secondary review by members of the agency's Language bank. They will review translated materials and provide feedback to the contracted vendor to ensure translations are done correctly and with minimum errors. The Language Access Coordinator will coordinate all requests for translations with respective divisions and contracted vendors. The LAC will maintain the list of any translated documents and update the list as necessary. During staff training, all attending staff will be made aware of the translation process and resources available to the agency.

### Interpretation Services:

The Department will provide telephonic interpretation services in the divisions accessed by the public through VOIANCE. This vendor will provide telephonic language interpretation in over 100 languages.

Telephonic interpretation requests may occur in the Municipal Library and Archives divisions when an LEP patron requests assistance to order a copy of a Death, Birth, and/or a Marriage certificate, or to request research material. In the External Affairs division, an in-person interpretation request may occur for a scheduled public program event.

Library and Archives public facing staff have been trained on how to access telephonic interpretation services with VOIANCE. All necessary materials to call the vendor are in a clearly marked binder at the public access desks. The same material will also be placed on the Departments Intranet to facilitate the process of providing language services. Additionally, telephones with dual headsets will be available at the public access desks to help LEP patrons and department staff access the telephonic language services, as well as to monitor the quality of the interpretation service the LEP customer receives.

To provide in person interpretation services to a scheduled event, the



Department has placed on its website a statement as follows: "If you require interpretation services, in order to attend a DORIS public program event, please contact our Language Access Coordinator." The statement has an embedded hyperlink that will provide the LAC's contact information. In person interpretation requests must be received at least 3 days prior to a scheduled event. At this time due to Pandemic restrictions, in person Services for the Archives, Municipal Library and Public Programs are not scheduled. During this time the Department will outreach to DCAS to continue utilizing VOIANCE for telephonic interpretation and to choose a new in-person interpretation service vendor to have a contract in place prior to the agency scheduling public program events.

The agency will utilize "I Speak Cards" to assist staff to identify LEP individuals and their primary language. While staff may not be able to provide translation assistance at this initial contact, it is an excellent method to identify the language and then contact the vendor for telephonic translation services.

#### Language Access in Agency Communications

One of the primary methods for the department to communicate with the public, regarding available services and resources is thru its website. In 2019, the Department's website reached 1,002,000-page views. Currently there are links on the agency's home page, which allow visitors to translate the entire website content into over 100 languages. This translation method is currently the citywide standard set by DOITT. Moving forward as part of its website updates, the department will look to develop multilingual links on its homepage that connect users with content in the specific language. The Department will continue to look to the Mayor's Office of Immigrant Affairs and DOITT for any guidance regarding this issue and will adhere to citywide standards.

The department also utilizes various social media platforms such as Facebook, Twitter, Instagram, YouTube etc. to promote special events or disseminate information pertaining to historical events or resources.

#### Plain Language

The department has not identified a need to translate any MCD forms, but the two most widely used forms by the public will be reviewed to incorporate plain language principles. If the need to translate these forms arises in the near future, the forms will have already been updated with plain language principles.

The department will also reach out to organizations such as the Center for

Plain Language, a non-profit organization to assist in staff training regarding the utilization of plain language principles in developing agency written materials.

### Policies and Procedures

The Department has developed the following procedures for language access services they include:

- How to Identify an LEP customer language: By utilizing Census "I Speak Cards" public facing staff will be able to identify the language of the LEP customer and contact the telephonic interpretation vendor to provide telephonic interpretation services.
- Resources to Provide Language Access Services: Materials on how to contact the vendor for telephonic interpretation services are in a clearly marked binder at the public service desks. These materials provide step by step instructions on what needs to be done to contact the language access service. All of these materials will also be placed on the Departments Intranet to ensure staff have access to them.
- Posting of Free Interpretation Signage: Multi-lingual posters advertising free language services will be posted in a visible place where the public is served, to ensure the public is aware of the free language services available to them. The LAC has placed these posters in these areas. Copies of the poster will be on the agency Intranet so that staff will be able to access it and print any of the existing posters are damaged or missing.

### Languages Beyond the Top Ten

If an LEP patron that does not speak one of the 10 languages identified in LL30, and requires language access service, the department will utilize its telephonic vendor who can provide translation services in over 100 languages.

### Emergency Preparedness and Response

The agency has developed a Continuity of Operations Plan to respond in case of an emergency. The Department's Continuity of Operation Plan has identified its essential service: to "Provide & Maintain Record Access & Retrieval for the City of New York and the Public." As such, telephonic interpretation services will be available via a wireless telephone service in the event that landlines are not operational or in the event of a need to relocate to an alternative

facility. In addition, staff from the agency's volunteer language bank may also be available to assist emergency LEP needs. The LAC will work with the emergency preparedness liaison in an emergency to ensure Language Access is part of the agency's emergency response. One of the principle methods of communicating with the public during emergencies is thru the department's website. Currently any announcement placed on the website can be translated to over 100 languages.

## **VII. Training**

All front-line workers and supervisors in the Municipal Library, Municipal Archives and External Affairs divisions will be required to attend an annual training on the Departments language access policies and procedures as set forth in the Language Access Plan. The LAC will be responsible for providing the training. All staff attending the training will be required to sign a training attendance sheet. The LAC will maintain a list of all staff who have attended the training and report on this in the annual LL30 report. The agency will review and amend existing language access policy/procedures to ensure they are up to date and incorporate them into the training agenda.

Areas the training will cover:

- Ensuring that the Multi-lingual Free Interpretation Service posters are always visibly posted.
- Identifying the primary language spoken by the LEP patron using the "Language Identifications" tools.
- Documenting requests for interpretation services.
- How to contact the telephone interpretation contracted vendor when a patron needs this service.
- Language Access Resources location.
- How to handle and record language access complaints.

## **VIII. Record Keeping and Evaluation**

The LAC will create a quarterly data-tracking log to gather data information on language access services requests. The agency front line staff will use this data-tracking log to record the number of patrons who required these services. The Municipal Library, Municipal Archives and the External Affairs division, will record requests for language services and at the end of the quarter; they will submit the log to the agency's LAC. The LAC will review these logs and maintain all data supplied by the divisions that use interpretation services as well as all reports supplied by contracted vendors.

All divisions will be expected to follow the Plan to comply with local law 30. The LAC may conduct spot checks of the divisions that use interpretation services

by calling or having someone come in who will identify themselves as not being English proficient. If a staff member is not following the agency's Plan, additional training can be provided to the individual staff member or the entire division.

## **IX. Resource Analysis and Planning**

The department may use a MWBE vendor for document translation if needed and will utilize VOIANCE, a DCAS approved vendor for its telephonic interpretation services. The Department is in the process of identifying a DCAS vendor for in-person interpretation services, which may be used at public program events. The LAC will coordinate the staff training; maintain data regarding language access services; respond to 311 language access complaints and issue reports to the Divisions and Commissioner regarding language access issues.

The department has created a volunteer language bank. This language bank will be updated regularly to bring in new volunteers and new languages. The language bank currently can offer the following languages: Spanish, Cantonese, Italian, French, French Creole, Gujarati, Punjabi and Hindi. Volunteers will be assessed in language skill level utilizing the American Council on the Teaching of Foreign Languages proficiency guidelines (ACTFL).

Because DORIS is a small agency with a limited budget to implement this plan, we will reach out to other city agencies and identify other resources available throughout the City. We will review other agencies' best practices and incorporate those practices when updating the Language Access plan.

## **X. Outreach and Public Awareness of Language Access Services**

To ensure the public is aware of the availability of the department's language assistance services, such as the free interpretation services, the department will embark on a public awareness campaign utilizing printed materials as well as web and social media channels.

The department will prominently display posters stating the availability of free interpretation services at locations used by the public.

Website: The agency will post on its homepage the availability of free interpretation services. It will also place the updated language access plan on its website.

Social Media: Using its social media platforms i.e. Twitter, Facebook, and Instagram the agency will post on a regular basis the availability of free

interpretation services.

## **XI. Language Access Complaints**

To ensure language access complaints are answered and resolved in a timely manner, the agency will: include a module in our annual staff training; monitor language access complaints received through 311 and through its internal complaint process; and appoint a language access coordinator responsible for receiving, tracking and answering complaints.

Staff Training: How to handle and record complaints regarding interpretation services will be part of the staff training and development process. Staff training will focus on utilizing a customer service-based approach in which the front line staff can resolve problems in a manner that allows patrons to satisfactorily receive requested services. If the front-line staff is unable to resolve the issue immediately, then they will seek assistance from their direct supervisor. If the issue cannot be resolved at that time, agency staff will inform the patron that they can file a complaint either by calling 311 or filling out a written complaint form.

Tracking Complaints/Maintaining Records: The LAC will receive complaints made through 311 and through its own internal complaint process. The coordinator will log the complaints into a central complaint file and will be tasked to investigate the complaint and respond accordingly.

Reporting Language Access Complaints: The LAC will compile all language access complaints on a monthly basis and generate a quarterly report.

Annual Reporting: The LAC will issue an annual agency language access complaint report.

## **XII. Implementation Plan Logistics**

The Commissioner of the Department of Records & Information Services has appointed the Special Assistant to the Commissioner as the agency's Language Access Coordinator. The Language Access Coordinator's responsibilities are to:

- Update and maintain the agency Volunteer Language Bank database.
- Schedule training to ensure that agency staff is prepared to provide language assistance upon request. Provide support and guidance to agency personnel regarding the language access services offered at the agency whether through contracted interpreters or onsite volunteer interpreters

- Periodically review needs and update as necessary agency's documents/forms for translation.
- Receive and respond to all language access complaints.
- Develop and maintain statistical information relating to the agency Language Access Plan.
- Develop a process for providing implementation updates as part of the agency's annual reporting requirements. Issue quarterly reports and annual reports.
- Revise the Language Access plan.

The following goals and milestones have been identified to advance language access at the department.

Language Access Goals	Milestones	Responsible Staff	Deadline
Update Language Access Plan	Review previous LA access requests.	Language Access Coordinator	May 2021
Update Language Bank	Contact existing staff, add new staff.	Language Access Coordinator	June 2021
Schedule Annual Training	Review previous training and update as needed.	Language Access Coordinator	July 2021
Update Contracted Vendors	Update existing contracts.	Language Access Coordinator, Commissioner	July 2021
Update Language Access Materials and Resources	Upload materials to agency Intranet, provide material to public serving desks.	Language Access Coordinator	July 2021
Begin to Develop Multilingual content for the website	Develop Information highlighting services and Resources at DORIS	Language Access Coordinator and Public Serving Divisions	October 2021
Translate Multilingual Content	Translate Content into the Ten designated languages	Language Access Coordinator and Certified Translators	December 2021

Develop Multilingual links for website	Review home page to incorporate multilingual links.	Language Access Coordinator, IT Division	January 2022
Develop individual language pages	website to include language pages	Language Access Coordinator, IT Division	February 2022
Update Website	Submit request to DOITT to update home page and add individual language pages.	IT Division and DOITT	March 2022
Update Language Access Plan	Review needs with Division Directors	Language Access Coordinator	June 2022
Continue Assessing Language Access Needs and Updating Language Access Plan	Meet with Division Directors, MOIA, vendors	Language Access Coordinator, Division Directors, Commissioner	2022-2024

# Language Access Implementation Plan 2021

New York City Department of Transportation  
3/31/2021



**This report provides an update on the agency's implementation of its Language Access Implementation Plan, as required by Local Law 30 (2017).**



# Language Access Implementation Plan - 2021

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

**New York City Department of Transportation**

**Deborah Siegel Baker - Language Access Coordinator/Administrative Staff Analyst**

<https://www1.nyc.gov/html/dot/downloads/pdf/dot-language-access-plan-2021.pdf>

## II. Agency mission and background

### A. Mission of the Agency

The New York City Department of Transportation's (NYCDOT) mission is to provide for the safe, efficient, and environmentally responsible movement of people and goods in the City of New York and to maintain and enhance the transportation infrastructure crucial to the economic vitality and quality of life of our primary customers, City residents. DOT is customer-driven in all our activities. We seek opportunities to create partnerships in the provision of transportation services through appropriate relationships and alliances. To accomplish our mission, the Department works to achieve the following goals:

- Provide safe, efficient, and environmentally responsible movement of pedestrians, goods, and vehicular traffic on the streets, highways, bridges, and waterways of the City's transportation network
- Improve traffic mobility and reduce congestion throughout the City
- Rehabilitate and maintain the City's infrastructure, including bridges, tunnels, streets, sidewalks, and highways
- Encourage the use of mass transit and sustainable modes of transportation; and
- Conduct traffic safety educational programs

Over 5,500 employees of NYCDOT oversee one of the most complex urban transportation networks in the world. NYCDOT's staff manage an annual operating budget of \$1.1 billion and a ten-year \$19.7 billion capital program, along with 6,300 miles of streets and highways, over 12,000 miles of sidewalk, and nearly 800 bridges and tunnels, including the iconic East River bridges. NYCDOT's staff also installs and maintains over one million street signs, 13,250 signalized intersections, over 315,000 street lights, and over 350 million linear feet of markings.

It should be noted that certain properties within the jurisdiction of NYC DOT are managed by the New York City Department of Parks and Recreation (NYC Parks) with permission from NYCDOT. Management of these properties by NYC Parks is temporary and is expressly not intended to create public parks or parkland.

NYCDOT promotes the use of sustainable modes of transportation. NYCDOT designs [bicycle facilities](#), bus lanes, and [public plazas](#). NYCDOT operates the [Staten Island Ferry](#), which served nearly 16 million people last year, and oversees ferry operations on City-owned piers. NYC DOT [educates students and adults Citywide about street safety](#). NYCDOT's staff issue [parking permits to people with disabilities](#), not-for-profit agencies and governmental entities, and [commercial vehicle permits for trucks](#); issue construction permits for [work in City streets](#); and manage the City's [Adopt-a-Highway](#) program.

## **B. Comprehensive Description of Services**

NYCDOT is the lead agency in Mayor Bill de Blasio's Vision Zero initiative, the City's systematic groundwork for ending traffic deaths and injuries on our streets. As part of this initiative, NYCDOT has been charged with, among other things, continuing to develop and streamline effective communications to all New Yorkers, whether English-speaking or the Limited English Proficient (LEP) community. Community outreach is a major aspect of NYCDOT's efforts, conducted throughout the five boroughs by multiple NYCDOT Divisions, Units and Offices to maintain, develop and promote transportation initiatives.

NYCDOT continues in its active outreach efforts engaging LEP communities through the provision of agency language services in various communication channels, such as face-to-face at Town Halls, Community Boards, and other outreach events, online through emails, social media, and surveys. NYCDOT invites customer feedback and participation in agency campaigns and the development of various projects such as Vision Zero; Covid-19 Initiatives: Open Streets and Open Restaurants; DWI; Safety Education; Transit Development; Bridge Construction; Truck Traffic; Bike Share; Public Plazas; and Parking Regulations.

NYCDOT's formation and implementation of the NYCDOT Street Ambassador program is an innovative strategy to expand agency outreach and ensure public engagement citywide. Customer-driven in all their activities, NYCDOT Street Ambassadors meet members of the public in their neighborhoods, engaging New Yorkers in the planning and development of NYCDOT projects aimed at safety, mobility, sustainability, and quality of life. NYCDOT Street Ambassadors (some who are bilingual) are committed to meeting people where they are and ensuring that everyone's voice counts, regardless of background or spoken language. The Customer Service, Language Access and Correspondence Unit (CSLACU) supports their efforts providing contracted multilingual and sign language interpretation. NYCDOT's goal is to move the City closer toward an inclusive and just planning process. Street Ambassadors are strategically deployed to busy areas near project sites and directly engage with the public, in the languages spoken in their neighborhoods. Summer Streets and Town Hall Meetings introducing NYCDOT initiatives are additional examples of NYCDOT outreach efforts utilizing Street Ambassadors in collaboration with CSLACU's Language Bank Volunteers (LBVs) and contracted multilingual and sign language interpreters.

CSLACU provides a full-range of language services operating for all customers: one-on-one customer communications; group settings; email and letter responses; fulfilling literature requests; distribution of: Voter Registration forms in multiple languages; distribution of NYCDOT translated materials as well as the installation of and updates to translated NYCDOT signage. NYCDOT supplements contracted language with NYCDOT bilingual employees who volunteer to provide language services. Bilingual employees provide interpretations in one-on-one communications with LEPs and they also review brief translation projects prior to distribution.

NYCDOT also provides the LEP public with both interpretation and translation services, partnering with many agencies and community organizations, including: Transportation Alternatives, The Horticultural Society; Mayor's Office for People with Disabilities; NYC Votes - NYC Campaign Finance Board or New Yorkers for Parks, Offices of the Borough President, and Elected Officials.

NYCDOT's Public Service Centers (PSCs), temporarily closed due to Covid-19 restrictions, offer additional customer service. PSCs are located citywide and, when they reopen post-Covid-19, members of the public will be able to transact business or obtain information in-person related to NYCDOT services such as: Parking Permits; Pre-Paid Parking Card and Municipal Off Street Parking Info; Roadway and sidewalk construction permits; Staten Island Ferry rides; Canopy information and authorization; Oath Violations; Disability, Clergy and other permit types. At these PSCs, customers can also request meetings and reviews with the NYCDOT Office of Construction Mitigation Coordination. CSLACU supports Mayoral initiatives and provides the critical link for LEP clients to communicate with NYCDOT in multiple languages and receive a variety of services. CSLACU provides customer service language programming through DOT's eight PSCs. Programs include language services such as translation, interpretation, transcription and plain language; design and installation of translated signage and materials; ensuring as needed repairs and overall maintenance of facilities; customer service/language access/voter assistance and training.

### III. Agency language access policy and goals

#### A. DOT's Language Access Policies

In September of 2019, Roseann Caruana was appointed the Assistant Commissioner of CSLACU. Roseann Caruana was later appointed as the Acting Staten Island Borough Commissioner in February of 2021. Yashwant (Neil) Sahadeo was appointed the Executive Director of CSLACU in February of 2021. Several of the related functions in the Language Access Unit and the Commissioner's Correspondence and Customer Service Unit were centralized to streamline customer service and improve productivity.

NYCDOT's CSLACU policy is to ensure efficient and equal access to Agency services, communications, programs and events for LEP customers by providing a full range of free language services. Meeting the language needs of all New Yorkers enables them to better access City services with the ultimate goal of increasing safety and improving their quality of life. By prioritizing the translation of License, Permit and Registration applications (LPRs), in accordance with Local Law 30 (LL30) we facilitate New Yorkers' mobility and increase economic opportunity, enabling our customers to better conduct business in and with the City. Translation of educational documents and the provision of in-person interpreters at NYCDOT events or community meetings, enables residents to actively participate in safety education, project planning and other vital City transportation initiatives, campaigns, and programs.

CSLACU is responsible for ensuring the accuracy of all translated materials and streamlining translation and interpretation requests with reduced wait times for translations, including written, in-person or telephonic interpretations. NYCDOT's Language Access policy is driven in support of Mayor Bill de Blasio's initiatives to promote equity and diversity, as well as economic and civic-engagement. This policy is communicated through the inclusion of a Language Access portal on NYCDOT's SharePoint page and direct communication and training of DOT staff. **CSLACU's policy is to:**

- **Continue to provide centralized agency-wide language translation and interpretation services utilized in various channels of agency communications;**
- **Continue to train NYCDOT employees in CSLACU procedures on when and how to provide language services;**
- **Continue to update, maintain and improve CSLACU signage posted in NYCDOT's PSCs and translated information distributed during agency community outreach and special events;**
- **Continue to develop agency-wide translation and interpretation standards and best practices to ensure quality translation and interpretation services while meeting the increased demand for such services;**
- **Continue to upgrade NYCDOT's Language Access Database (LAD) for effective management of language services data;**
- **Continue to develop agency-wide processes and procedures designed to consolidate, simplify and integrate agency content for improved customer language access, readability and effective communication.**

#### B. NYCDOT Language Access Implementation Plan Goals

- Design, translate, produce and install Customer Service Language Access signage in the 10 designated citywide languages by end of FY21
- Upgrade NYCDOT's CSLACU LAD request portal to facilitate a one stop shopping experience for DOT project managers to request both translation and interpretation services by end of FY20
- Implement plain language in NYCDOT's Essential Documents before translating them to the top 10 languages by FY23
- Conduct customer service language access usability surveys in three of the 10 designated citywide languages by end of FY22

**IV. Agency language access accomplishments and progress on goals from previous LAIP**

Goal	Update
<p><b><u>NYCDOT Licenses, Permits, and Registrations (LPRs):</u></b>            Create website portal to LPRs translated into the City's top 10 languages.</p>	<p>NYCDOT met the July 2020 roll-out date and created equal access to all 51 LPRs for LEP customers. The new LPR portal also adheres to ADA graphic accessibility standards.</p>
<p><b><u>Language Access Database (LAD):</u></b>            Enhanced LAD user experience with additional improvements to the technology, accessibility, layout, and submittal process. Future plans are underway to upgrade the use and technology of LAD.</p>	<p><b>LAD</b> was upgraded in February 2021 with a new user interface, improving accessibility to all aspects of the program. Submittal of translation and interpretation requests is streamlined.</p> <ul style="list-style-type: none"> <li>- CSLACU is conducting LAD training for NYCDOT Divisions.</li> </ul>
<p><b><u>Essential Documents (EDs):</u></b>            Upgrade Most Commonly Distributed Documents (MCDs) which DOT refers to as Essential Documents (EDs) and eliminate obsolete documents.</p>	<ul style="list-style-type: none"> <li>- Created a tracking/maintenance database for Essential Documents in March 2020.</li> <li>- All new documents will be converted into plain language, as appropriate, post-Covid-19 hiatus.</li> </ul>
<p><b><u>Plain Language Initiatives:</u></b>            CSLACU scrutinized work product of plain language consultant and consulted with operational units for whom documents were revised to plain language versions.</p>	<ul style="list-style-type: none"> <li>- NYCDOT eliminated costly Plain Language consultant contract in January 2019 and brought program in-house.</li> <li>- CSLACU created Plain Language version of PPPD Brochure.</li> <li>- In 2021, PPA is now rolling out a portal of plain language documents translated into the top 10 languages.</li> <li>- CSLACU will create plain language versions of additional Essential Documents, post-Covid-19 hiatus.</li> <li>- CSLACU is also researching various Plain Language websites and software developers to determine their effectiveness in expanding our toolbox.</li> </ul>
<p><b><u>Glossary of Commonly Used Transportation-related Terminology:</u></b> CSLACU is currently examining the efficacy of pursuing this program, as it has limited application at present. Budgetary restrictions under Covid-19 have placed non-essential programs on hiatus.</p>	<ul style="list-style-type: none"> <li>- CSLACU continues to maintain its existing glossary, which is currently available in Spanish, Traditional Chinese, and Russian.</li> <li>- Secondary review was conducted for each of the translated terms.</li> </ul>
<p><b><u>Literature Requests:</u></b>            Eliminate distribution backlog.</p>	<ul style="list-style-type: none"> <li>- CSLACU eliminated the backlog of 3,500 Literature Requests and improved the turnaround time from 30 days to 2 days.</li> <li>- Literature requests are now being input into the Agency Response Tracking System (ARTS) to enable tracking and follow-up on returned envelopes.</li> </ul>
<p><b><u>Expand the Use of Verizon Message Boards:</u></b>            Distribute the system throughout the boroughs.</p>	<p>CSLACU is working on expanding the use of the Verizon Message Boards with plans to install them at all NYCDOT Public Service Centers, once they reopen post Covid-19. This will create geographically and demographically targeted communications and increase the Agency's reach.</p>

## V. LEP population assessment

To properly assess translation/interpretation needs for LEP customers and to satisfy all compliance standards set forth by Local Law 30 and Executive Order 120, NYCDOT is guided by the **United States Department of Justice’s (DOJ) 4-Factor Analysis**.

### **Factor 1: The Number or Proportion of LEP Persons Eligible to be Served or Likely to be Encountered by the Program**

CSLACU has estimated the **number of LEP persons eligible to be served or likely to be encountered** based on the most recent published data from the 2018 United States Census Bureau/American Community Survey. The most common languages spoken and read by approximately 1.8 million LEP persons (those identified as “Speaking English less than very well”) in New York City are:

#	Language	Percent
1	Spanish	48
2	Chinese	18
3	Russian	6
4	Bengali	3
5	Haitian Creole	2
6	Korean	2
7	Arabic	2
8	Yiddish	2
9	French	1
10	Polish	1
11	Urdu	1
12	Italian	1

As of June 30, 2020, CSLACU completed translating NYCDOT’s most commonly distributed License, Permit, and Registration (LPR) applications and supporting documents (51 total) into the ten designated Citywide languages spoken and read in New York City, including Spanish, Chinese, Russian, Bengali, Arabic, Korean, Haitian Creole, Polish, Urdu, and French (for a total of 510 documents).

### **Factor 2: Frequency with which LEP Persons Come in Contact with the Program**

In addition to the population data provided by the American Community Survey and in accordance with Executive Order 120 and Local Law 30, NYCDOT measures its **frequency of contact with LEP persons** requiring LPR applications by calculating:

- The volume of LPR and other translation and interpretation requests in languages other than English,
- The volume of LPR application downloads/web hits from the NYCDOT website,
- The volume of translated literature requests,
- The volume of requests for telephonic interpretation/translations generated at one of NYCDOT’s eight Public Service Centers and through walk-in customers at various NYCDOT sites,
- The volume of in-person interpreters requested when NYCDOT is organizing or being represented at community events,
- The volume of translated inquiries and LPR forms submitted to NYCDOT for processing, and
- The volume of in-person submittals of translated documents and LPR forms at NYCDOT’s Public Service Centers.

Due to the COVID-19 pandemic, all of NYCDOT's Public Service Centers (PSCs) have been closed to the public since March 2020. Additionally, volumes of literature requests and telephonic interpretation requests from the public have been low. Although in-person meetings have mostly ceased, NYCDOT has held or participated in several events held via Zoom, where foreign language interpreters and translated materials have been requested based on the demographics of the neighborhood where the event is being "held". The vast majority of requests have been for Spanish or Chinese. During the Covid-19 pandemic, NYCDOT is conducting in-person distribution of flyers advertising Zoom Town Hall and outreach meetings. Intermittent Street Ambassador outreach to LEP merchants is also taking place. As such, NYCDOT will continue to provide translations of NYCDOT materials and telephonic interpretations in any language requested by our LEP customers.

**Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Program to People's Lives**

NYCDOT provides LPRs and educational materials to members of the public, businesses, organizations, and large corporations. To evaluate the nature and importance of providing translated materials to people's lives, consideration must be given to the broad range of requests received: most importantly, applications for Parking Permits for People with Disabilities (PPPD) from New Yorkers (and their caregivers) who are in most need of parking access due to their severe mobility impairments. Other applications include permits to contractors who are completing vital street and sidewalk work and repairs (approximately 750,000 permits issued annually), intercity commuting matters, bridge access, and parking permits for clergy and not-for-profit organizations. Additionally, NYCDOT translates event-specific materials such as meeting flyers and PowerPoint presentations into languages based on the demographics of the neighborhood where the event is being "held" virtually, or physically. These translated materials provide access and opportunity for all New Yorkers to participate in community planning. Additionally, during the Covid-19 pandemic, on the NYCOT website and social media sites, we have initiated and updated translations, in the ten mandated languages, of all service changes, notices and Covid-19-specific programs, such as Open Streets and Open Restaurants.

**Factor 4: Resources Available to the Agency**

NYCDOT's newly reorganized CSLACU utilizes a toolbox of **available internal and external resources** to assist LEP persons in accessing translated LPR applications and other materials in any of the top ten languages. Citywide Language Bank Volunteers and bilingual DOT employees are also available to assist LEP individuals in completing translated documents, LPR applications, and in-person requests at one of NYCDOT's Public Service Centers. CSLACU staff also utilizes Language Line (an available translation service contracted by DCAS) to translate completed LPR applications and LEP NYCDOT requests into English for processing, which then undergo a secondary translation review for quality assurance and translation accuracy. CSLACU also works closely with DOT's IT & Telecom Division and Strategic Communications Unit to improve the efficiency of NYCDOT's public facing website, resource portals, and public graphic and digital communications. The increased volume of translations, due to frequent Covid-19-related service updates has strained our translation budget, but we have managed to retain the same level of service.

Using the foregoing analysis as a guide, NYCDOT will continue to provide all LPRs and essential documents in the ten designated citywide languages and continue to translate flyers, notices and other materials, depending on the reach of the materials and geographical area targeted. However, we will not proactively expand the number of languages provided for LPRs and essential documents at this time, due to budgetary constraints created by Covid-19.

## **VI. Provision of Language Access Services**

### **Translation**

NYCDOT continues to provide meaningful access to LEP customers, ensuring compliance with applicable Executive Orders and Local Law 30. Our translation vendor is Language Line Solutions, which provided over 500 document translations in 2020. LBVs have been used to provide short translations of phrases and dates or to review brief translations in very few instances. All LBVs have been certified and registered through the NYC Volunteer Language Bank.

Translation requests from NYCDOT staff are submitted through the Language Access Database (LAD), a proprietary database, created by Language Access for submission and processing of translation and interpretation requests. Translation requests from NYCDOT customers would typically be submitted via webform or in-person at one of our Public Service Centers (temporarily closed due to COVID-19 restrictions), then forwarded to Language Access staff for processing.

All translation requests are project managed by the Language Access Translation and In-Person Coordinator or other Language Access staff. All translation requests are processed and tracked through LAD. Translations fall into two basic categories: requests from operational units, typically event-specific flyers or materials, service updates and web content; or, Most Commonly Distributed (MCD) documents, which includes all License, Permits and Registrations as well as our most commonly distributed materials. Event-specific materials are generally translated into targeted languages, based on the demographics of a given neighborhood, whereas all Essential Documents are translated into a minimum of the ten languages designated by LL30. In 2020, NYCDOT translated all 51 LPRs into the ten designated languages and created a web portal on our website where LEP customers can access them, grouped by language or category. We also reviewed all essential documents, retiring several obsolete documents and reviewing all for plain language. To ensure that all essential documents are translated, we reach out to all operation units semi-annually to ascertain if any essential documents have been created, revised or retired. All new and revised documents are reviewed for plain language prior to translation.

Translated materials are distributed in several ways. In addition to the previously mentioned LPR Portal, translations of all Service Updates and information for all COVID-related programs, such as Open Restaurants, are conspicuously posted to our website in the ten designated languages. Event-specific flyers and neighborhood-specific notices are distributed electronically, often via partnership with sponsoring elected officials and community groups, as well as in-person, through outreach events or public postings. Targeted messages in languages other than English have also been posted to social media, through the NYCDOT's Twitter account.

Reviews of translations are provided by our vendor, GV Solutions (GVS). Translations of all essential documents are reviewed by GVS, as well as large translation projects, selected on a case-by-case basis. Additionally, native speaking staff from operational units requesting translations, often review them independently and advise Language Access staff of any discrepancies or preferential changes.

Staff are made aware of translation services and the request procedure through posting on our internal SharePoint page and periodic emails to all staff. Following a redesign of the translation and interpretation request process, an all-staff email was sent in January 2021, reminding staff of our Language Access policy and distributing Standard Operating Procedures for translation and interpretation requests. Additionally, a new LAD Training Manual has been created and is being distributed during training sessions, which commenced in February 2021. Training will be provided to members of each operational unit throughout the year.

### **Interpretation**

NYCDOT provides telephonic, in-person and virtual interpretation through our vendors, Language Line (through November 2020) and Voiance (telephonic) and Accurate Communications (in-person/virtual). Through Voiance, NYCDOT employees and customers have access to telephonic interpretation in over 100

languages. Accurate Communications provides in-person/virtual interpretation in over 20 spoken languages, ASL and Spanish Sign Language. Although Language Bank Volunteers are available and LBV lists are provided to all Public Service Center managers, almost all interpretation is done through our vendors.

Telephonic interpretations are typically initiated through NYCDOT's call-in numbers or at our Public Service Centers (which are temporarily closed due to Covid-19 restrictions). Unit managers initiate the call to Voiance so that interpretation can be provided. Once connected to Voiance, the LEP customer can state the language they need interpretation in. All in-person/virtual interpretation requests are project managed by the Language Access Translation and In-Person Coordinator or other Language Access staff. NYCDOT staff would determine which language(s) interpretation is/are needed, depending of the demographics of the subject neighborhood where the event is held. All in-person/virtual interpretation requests are processed and tracked through LAD. Due to COVID-19 almost all interpretation is currently being conducted virtually. Interpreters have been requested and provided for informational sessions, workshops, and community events, as well as internal employee meetings. Although outreach events have been limited, when they are held, an interpreter is always retained and typically accompanied by at least one bilingual staff member. The quality of interpretation services is evaluated and ensured through feedback, provided by attendees of NYCDOT events and bilingual staff who attend or monitor the events.

Similarly to translation, staff are made aware of interpretation services and the request procedure through posting on our internal SharePoint page and periodic emails to all staff. Following a redesign of the translation and Interpretation request process, an all-staff email was sent in January 2021, reminding staff of our Language Access policy, and distributing Standard Operating Procedures for translation and interpretation requests. Additionally, a new LAD Training Manual has been created and is being distributed during training sessions, which have commenced in February 2021. Training will be provided to members of each operational unit throughout the year.

### **Language Access in Agency Communications**

Translated materials are distributed in several ways. Aside from the previously mentioned LPR Portal, translations of all Service Updates and information for all COVID-related programs, such as Open Restaurants, are conspicuously posted to our website in the ten designated languages. Event-specific flyers and neighborhood-specific notices are distributed electronically, often via partnership with sponsoring elected officials and community groups, as well as in person, through outreach events or public postings. Targeted messages in languages other than English have also been posted to social media, through the Department's Twitter account.

### **Plain Language**

To ensure clear and effective communications, all essential documents are reviewed for plain language prior to translation and distribution. On a semi-annual basis, CSLACU contacts each operational unit to ascertain if any essential documents have been created, altered or retired. All documents submitted are reviewed and revised to align with plain language principles. To ensure that other translated materials, including flyers, informational materials and service updates, follow plain language principles, CSLACU is considering development of a training program or instructional materials, focused on plain language. Currently, Our Language Access SharePoint site provides a link to [PlainLanguage.gov](https://www.plainlanguage.gov), where useful tips for writing in plain language are provided.

### **Policies and Procedures**

NYCDOT's Language Access policies and procedures are stated through several SOPs, created by CSLACU. SOPs for use of LAD to submit translation and interpretation requests clearly state all procedures for submitting requests. SOPs developed for use by Public Service Center staff detail the process for identifying a customer's language through the use of "I speak..." posters, displayed at all PSCs, and procedures for using telephonic interpretation or requesting assistance from a Language Bank Volunteer. Distribution of materials and scheduling of training sessions for PSC staff are currently on hold until the PSCs reopen.



## **Notification of Free Interpretation Signage**

Notice of “Free Interpretation Services” is available to LEP customers via prominently displayed “I speak” posters, “Welcome” palm cards and “I Speak” cards at our PSCs. PSC staff have been instructed in the use of these materials to ascertain the language needs of LEP customers. Additionally, Voiance has provided tips for using telephonic interpretation, which are distributed to all PSCs. NYCDOT has acquired several electronic messaging boards, already in place at 55 Water Street in 2020, with plans to install them at all DOT Public Service Centers throughout every borough. Once Covid-19 restrictions are resolved, CSLACU will deploy the Verizon Message Boards that have already been designed for installation in 2020-21. This digital signage will create geographically and demographically targeted communications and increase the Agency’s reach. This will also afford LEP clients the ability to share their ideas with and provide feedback to NYCDOT.

## **Languages Beyond the Top Ten**

NYCDOT works to ensure that all New Yorkers have access to our services and pertinent information. As such, we are expanding the number of languages into which certain documents are translated. Currently, the Alternate Side Parking Calendar is published in 14 languages other than English, including the Top Ten as well as Italian, Greek, Yiddish and Simplified Chinese. A new NYCDOT Parking Permits Portal is currently being created for customers to register for, obtain and renew special parking permits. The entire portal is being translated into 11 languages, including Yiddish. CSLACU can also accommodate requests for translations in over 240 languages. A direct link to the Language Access email address is provided on the NYCDOT website. Any message received in a language other than English will be sent to LanguageLine for translation. Once translated, a response and any requested materials will be translated into the requestor’s preferred language by LanguageLine and then sent to the requestor. The NYCDOT website is currently accessible in any language through a “Google Translate” tab at the top of the page.

## **Emergency Preparedness and Response**

- **Accurate Communication will deploy multilingual and/or ASL interpreters, as required, to emergency sites designated by NYCDOT, in support of the NYPD, or the OEM.**
- **LanguageLine Translation Service (LLTS) provides rush translations to respond to emergency-related NYCDOT service changes, when required.**
- **Voiance is available 24/7 through any emergency site to provide telephonic multilingual interpretation in over 200 languages.**
- **The NYCDOT website is continually updated with translations of service changes, offering LEP customers access to multilingual digital information.**
- **NYCDOT’s Borough Commissioner Offices disseminate emergency and service updates through the use of community and ethnic media.**
- **NYCDOT also translates essential Twitter-feeds.**
- **Once Covid-19 restrictions lift and all public service centers (PSCs) reopen, demographically targeted digital timely announcements and emergency notifications will be continually updated.**

In the event of an emergency, NYCDOT’s Office of Emergency Response is responsible for adhering to a multi-agency communication protocol administered by NYPD. At all times, the Language Access Coordinator will respond to the agency’s needs to support the LEP community in times of crisis, in addition to day-to-day service.

CSLACU has developed an emergency interpretation plan that provides professional interpretation services at a specific site upon request from any DOT emergency personnel to ensure that language needs are addressed. An emergency site would be one designated by the NYCDOT, NYPD, or OEM. The plan also includes telephonic interpretation which can be arranged immediately 24 hours/day, 7 days/week with our consultant, Voiance. In addition, our translation vendor, LanguageLine has the ability to receive and produce expedited translations needed for distribution during an emergency. For broader, large-scale

emergency situations (citywide shutdown, hurricane, natural disasters, etc.), CSLACU will take direction from the City’s Office of Emergency Management and provide language services at any citywide site, as needed, to assist with disseminating NYCDOT-related information.

As a preventative safety measure, in an effort to better determine the language proficiency of DOT’s field workers and prepare a database of internal language needs, CSLACU produced a Work Zone Safety survey that was distributed on November 28, 2019 to field workers in the Sidewalk Inspection Management (SIM), Roadway Repair and Maintenance (RRM), and the Bridges Divisions. All of the surveys were returned by December 20, 2019. The purpose of this survey was to determine the need for Work Zone Safety training in additional languages. The survey asked three simple questions and provided 11 language choices and “Other”, as seen on the following page:

The image shows a survey form with an orange header and a white body. The header contains the text: "Thank you for taking the time to help us improve Work Zone Safety Training. Please take a moment to answer these questions." and the New York City DOT logo. The survey consists of three questions, each with a list of language options and an "Other" field.

**Thank you for taking the time to help us improve Work Zone Safety Training.**  
Please take a moment to answer these questions.

**NEW YORK CITY**  
**DOT**

**What language do you speak or understand most often?**

English  Spanish  Chinese (Mandarin)  Russian  Korean  Urdu  
 Bengali  Arabic  Haitian Creole  French  Polish  Other \_\_\_\_\_

**What language do you prefer to receive Work Zone Safety Training?**

English  Spanish  Chinese (Mandarin)  Russian  Korean  Urdu  
 Bengali  Arabic  Haitian Creole  French  Polish  Other \_\_\_\_\_

**In what language do you prefer to receive Work Zone Safety Training materials?**

English  Spanish  Chinese (Mandarin)  Russian  Korean  Urdu  
 Bengali  Arabic  Haitian Creole  French  Polish  Other \_\_\_\_\_

NYCDOT’s website landing page is directly linked to the NYC citywide DOHMC Covid-19 Portal and the translations available on that portal.

- Internally, Bilingual staff is available to interpret the protocols to LEP employees.
- Externally, CSLACU coordinates with IT and Strategic Communications to update NYCDOT’s landing page with all Covid-19 related NYCDOT service changes and translate updates into the top ten languages for NYCDOT’s LEP customers.
- Obtain telephonic interpretation to interpret DOT emergency updates, when requested.
- Worked with IT and Strategic Communications to redesign NYCDOT’s homepage and create a new landing portal for all LPR documents with universal icons to meet ADA compliant web standards and allow universal access to DOT emergency updates.

## VII. Training

The Language Access translation coordinator and interpretation coordinator provide training on their respective roles to NYCDOT operational units. Prior to the disruptions caused by the Covid-19 pandemic, we would provide in-person training for our NYCDOT operational units in order to reacquaint them with our duties and available language services. For our LPR rollout, we intended to conduct specialized training with each of the relevant units for processing. However, once the pandemic hit, we had to postpone our upcoming trainings to a future date.

As our Language Access Database had a user-interface update in mid-2020, it was important to provide training to the most frequent requesters of our multilingual services. Previously, our interpretation requests were processed through a fillable PDF form sent via email from the requesting Operational Units. Now, all interpretation requests are processed internally and recorded through LAD.

CSLACU scheduled webinar presentations for operational units (which were recorded) and walked through our new updates to the LAD application in real-time. A training session was held with NYCDOT's Training and Development Unit and we will continue training other operational units as needed in 2021. Currently, we are identifying NYCDOT groups based on frequency of usage. Additionally, once DOT's PSCs reopen, we will provide specialized training at each of our PSCs, which will include presentations for processing CSLACU's translated LPRs.

- NYCDOT operational managers who oversee NYC DOT's PSCs received links to Local Law 30 and were apprised of LL 30's LPR mandate.
- An agency-wide email was sent to all NYCDOT staff instructing them on how to use LAD's portal to easily access document translation and interpretation services. This same method was posted on NYCDOT's internal SharePoint. The new LAD deployment took place on February 25, 2021. At that time, CSLACU introduced Zoom training (due to Covid-19 restrictions) for the new LAD program. LAD training will be ongoing.
- The PSC personnel have been trained to provide LEP customers with three-way interpretation during the pandemic and dual phone lines connecting them to Voiance interpretation services when the PSCs reopen post Covid-19.
- NYCDOT Street Ambassadors coordinate with the in-person multilingual interpreters at their outreach events and introduce them to LEP customers and assist the customer in understanding the activity.
- NYCDOT Street Ambassadors work with the Accurate Communications in-person ASL interpreters at their outreach events and introduce them to customers requiring ASL assistance to understand the activity.
- In an effort to better determine the language proficiency of NYCDOT's field workers, CSLACU produced a Work Zone Safety survey that was distributed on November 28, 2019 to field workers in the Sidewalk Inspection Management (SIM), Roadway Repair and Maintenance (RRM), and the Bridges Divisions. All of the surveys were returned by December 20, 2019. The purpose of this survey was to determine the need for Work Zone Safety training in additional languages.
- Future training of operational managers is being planned for roll-out of the new NYCDOT LPR web portal.
- In compliance with LL 30, CSLACU is developing internal guidelines, SOPs and training procedures for NYCDOT staff, related to the introduction of LPR applications in languages other than English. A training session for all PSC employees and LBVs had been scheduled for April 3, 2020, but was postponed due to Covid-19 restrictions.
- The May 8, 2020, CSLACU LPR Orientation for PSC staff and LBVs, introducing LL 30 and the LPR mandate, a presentation on multilingual translation procedures, and utilizing the new LAD was postponed until February 25, 2021. At that time, CSLACU introduced Zoom training (due to Covid-19 restrictions) for the new LAD program which will be ongoing. Training will include how to serve LEP customers, provide and process LPRs, and encourage voter registration

- CSLACU will conduct on-site training and follow-up sessions, once Covid-19 restrictions lift, with all operational units impacted by the introduction of applications in languages other than English. These Units include: Parking Permits for People with Disabilities (PPPD), the Office of Construction Mitigation and Coordination (OCMC), Staten Island Ferry, the Division of Bridges, and Highway Inspection and Quality Assurance (HIQA). Staff in these Units will be trained with SOPs we are also developing for receiving non-English applications, utilizing LAD and requesting translation of the application information, so that it may be processed and the appropriate licenses, permits or registrations furnished to the customer.
- CSLACU will resume its routine visits to all public-facing offices and service centers, once Covid-19 restrictions allow reopening the PSCs. These visits will focus on training (with periodic inspections and personnel reviews) and supplying each center with documents in the ten languages required by LL 30.
- CSLACU updates the Language Bank Volunteer (LBV) List annually. An email was circulated on February 7, 2020 to all LBVs to verify their continuing participation. As part of Local Law 30's mandate, CSLACU has developed SOPs outlining best practices for NYCDOT's PSCs to process translated LPR forms received. As part of this customer service initiative, we are seeking LBVs for limited assistance (LBV schedules allowing) to the staff at our PSCs with the English translations of completed LPR forms that have been translated into one of the top ten languages. This does not require the LBVs to be on-site at the Public Service Center. CSLACU can use the call list that will be distributed to each of the eight PSCs. Once NYCDOT reopens the PSCs, CSLACU will provide training for both the LBVs and the Public Service Center staff on the seamless process for providing LEP customers with the most professional and efficient service.

### VIII. Record Keeping and Evaluation

- Designed and implemented an improved **Language Access Database (LAD) to track CSLACU's translation and interpretation projects**
- Produce monthly **Mayor's Management Report** data
- Produce **EEO/EDI Quarterly Updates on CSLACU's activities**
- Produce **Annual Title VI Report** for the FHWA
- Produce **MOIA's Annual Report on NYCDOT's Language Access Implementation**
- Produce **MOIA's Triennial NYCDOT Language Access Implementation Plan**

In addition to the population data provided by the American Community Survey and in accordance with Executive Order 120 and Local Law 30, **NYCDOT measures its frequency of contact with LEP persons** requiring applications by calculating:

- The volume of translation requests in languages other than English - 168
- The volume of application downloads/web hits from the NYCDOT website – N/A in 2020
- The volume of literature requests - 365
- The volume of requests for telephonic interpretation/translations generated at one of NYCDOT's eight Public Service Centers and through walk-in customers at various NYCDOT sites – N/A due to COVID-19 restrictions
- The volume of in-person interpreters requested when NYCDOT is organizing or being represented at community events
  - This number varies by community, depending on the number of separate LEP communities residing in a given Community Board: 57 requests, resulting in 122 interpreters being assigned in 2020
- The volume of translated LPR forms submitted to NYCDOT for processing – N/A: none through PSCs, ARTS, or LAD in 2020
- The volume of in-person submittals of translated LPR forms at NYCDOT's Public Service Centers – N/A: none through PSCs, ARTS, or LAD in 2020
- CSLACU is developing methods for surveying LEP customers that we have served.

## **Record keeping**

The vehicles/tools listed below all retain valuable data that will facilitate our review and evaluation of the demand for Language Access and how to further improve LEP connectivity to NYCDOT's outreach programs, LPRs, and commonly used documents:

- 311 tracks the volume of Literature Requests received
- NYCDOT's LAD portal tracks and generates reports quantifying the volume of:
  - Document Translation Requests through LanguageLine Solutions (LLS)
- Future development within the LAD system could generate reports quantifying the volume of:
  - Over-the-phone Interpretation Requests through LLS and Voiance
  - In-person Interpretation Requests are tracked through Accurate Communications
  - These are currently calculated and analyzed manually.
- In-person Interpretations were tracked in-house on an Excel spreadsheet during 2019 and 2020
- In-person Interpretations will be tracked by LAD in 2021.
- NYCDOT's Agency Resource Tracking System (ARTS) is capable of tracking language service, but was not utilized for this purpose during 2020, or 2021.

## **Evaluation**

- CSLACU Quality Assurance is conducted.
- LanguageLine provides three levels of translation reviews.
- GV Solutions provides additional secondary review services.
- CSLACU is in the process of developing methods for surveying LEP customers served. Deployment of surveys has been delayed due to Covid-19 temporary closures of PSCs.

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

CSLACU utilizes a toolbox of available internal and external resources for LEP persons to access translated documents in any language required, LPR applications in any of the top ten languages, and in-person and telephonic interpretations:

- **Internal Resources Utilized:**
  - CSLACU's new configuration is as follows:
    - Language Access Coordinator (LAC) evaluated 2020 Language Access services and processes used to assist LEP customers and developed streamlined operations. LAC has added and continues to implement process improvements. The LAC monitors CSLACU literature and voter registration material distribution. The LAC is also responsible for all analysis and language access reporting, both internally at NYCDOT and for external city, state, and federal reports. Ongoing analysis of new procedures will inform future actions, and a new
    - Community Coordinator is working with existing staff to implement operational improvements.
    - The Chinese bilingual Community Associate participated in NYCDOT's Leadership Academy, increasing his knowledge of DOT operations and improving his ability to communicate that information to LEP customers. Associate translated documents into Traditional and Simplified Chinese, provided Chinese interpretation at NYCDOT outreach events, and helped to create a glossary of commonly used transportation-related terminology in both Traditional and Simplified Chinese.

- The Community Associate coordinates and verifies the current list and participation of Language Bank Volunteers
- The Community Associate coordinates all requests for interpretation services and participates and monitors NYCDOT outreach event participation.
- Both the Community Coordinator and Community Associate submit ARTS requests and division/unit requests to LAD for translation services, multilingual and sign language interpretation.
- CSLACU's Graphic Artist develops Language Access posters, hand-outs, digital displays, and icons/logos/portals utilized on NYCDOT's website and SharePoint.
- One Computer Science Intern develops, upgrades, and maintains LAD, assists with the LPR portal, and conducts occasional Arabic-language reviews.
- NYCDOT and citywide Language Bank Volunteers have provided document translation services, in-person and telephonic interpretation services.
- **External Resources Utilized:**
  - Language Access staff also utilized the following external vendors:
    - **LanguageLine Translation Solutions (LLTS)**, currently provides document translation service under the DCAS translation contract.
    - **LanguageLine** provided telephonic interpretation through November 2020, under the DCAS telephonic interpretation contract.
    - **Voiance** currently provides telephonic interpretation service under the DCAS translation contract.
    - **Accurate Communication Services** provides both virtual and in-person multilingual and American Sign Language Interpretation services within NYCDOT operational units and at NYCDOT outreach events.
    - **GV Solutions** conducts secondary translation reviews for quality assurance and translation accuracy.

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

CSLACU translates multilingual promotional materials for distribution at public events which will resume frequency post Covid-19. For example, pre-Covid-19, for NYCDOT's Freight Mobility Unit's "Truck's Eye View" public exhibit, CSLACU created multilingual poster boards to increase publicity and also printed palm cards to distribute to LEP attendees. When dispensing the palm cards, it provided a moment to open a dialogue with members of the public in their language and obtain feedback on how we can make language access even more accessible to the public. In conjunction with the Office of Freight Mobility's "Truck's Eye View" initiative, Language Access and its in-house Graphic Artist designed and printed promotional posters and palm cards to publicize five events for safety awareness. Two Spanish, and two Chinese (one Mandarin and one Cantonese) Interpreters were on hand at each of the events to explain trucksafety tips and to give New Yorkers a glimpse behind the driver's seat of a Department of Sanitation truck to see how obtrusive blind spots are when seated in the cab. After this, Language Access assisted by recording their trucking hotline in English, Spanish, and Mandarin for New York City truckers.

At NYCDOT's 2019 Summer Streets event (cancelled in 2020, due to Covid-19), we stocked each information table with pre-translated multilingual material to distribute to the public. When someone of the respective language approached a booth, a multilingual brochure package was assembled for them, in addition to flyers about job and internship opportunities with NYCDOT and Language Access. When approached by LEP customers, we could inform them in their language of preference about our mission and mandates. Additionally, we provided a survey to evaluate the multilingual assistance they received that day. Customers received CSLACU's contact information, should they have transportation-related inquiries arise in the future that we could assist with.

In 2019, there were 11 PSCs; however, due to ongoing construction at the Queens PSCs, there are currently eight PSCs which will reopen post Covid-19. The PSCs are routinely serviced to maintain signage offering free language services, when not closed due to Covid-19. The Mayor's Office of Immigrant Affairs' poster alerting LEP customers of their right to access interpreters in their native language was posted in all of our PSCs, together with a poster designed by DOT with a similar message. The PSC managers are also trained to offer the telephonic translation services to any customer requiring multilingual interpretation and translation assistance. Progress was made to coordinate media production and community LEP outreach efforts, as evidenced by the publications distributed and listed on the following pages:

### 1. Publications

- Postcards (4 Postcards; various language translations, see context below):
  - "Get There Without a Ticket" postcard - word flow corrections incorporating (Spanish & Chinese) translations. Prepared final document for print.
  - "Free Interpretation Available, We're Here to Help" postcard - formatted three translations (Spanish, Chinese & Russian) Prepared final document for print.
  - Vision Zero "Jamaica Avenue" postcards transcribed Punjabi into layout, editing to accommodate word flow, provided native file package created final for print.
  - "Welcome/Free Interpretation Cards" to be distributed to 11 Public Service Centers. Designed 11 PSC Cards containing 10 languages (English, Spanish, Russian, Chinese, Korean, Haitian Creole, Italian, Bengali, Arabic and Polish) for LanguageLine translation. **Total: 110 cards (originals) - usually 500 copies are printed.**
- Flyers (3 Flyers; various language translations, see context below):
  - "Car- Free Earth Day"  
Transcribed Spanish translation into flyer's layout; altered design to accommodate translated text overflow. Prepared final document for print.
  - "Parking Regulations - Info on Website/Sign Legend" flyer designed for Permits & Customer Service's Public Service Center at 30-30 Thomson Ave. (English)  
Prepared final document for print.

- “WalkBus Pilot Program for Parents” flyer for Safety Education - transcribed into four languages: (English, Spanish, Arabic & Traditional Chinese); revised design/edited images to incorporate text overflow
  - **Brochure (1 brochure; awaiting approval will be printed in 11 languages):**  
Designed “Parking for People with Disabilities (PPPD)” brochure (new look) for revised textural content. (Project in progress)
- 2. Posters/Postcards - Community Outreach Events**  
(5 Posters; 1 Postcard; 1 Identity Card: various language translations):
- “Truck’s Eye View”: Designed poster “Free Interpretation Available, We’re here to help” for community event. Formatted/transcribed three translations: (English, Spanish, Chinese & Russian)
  - “NYC Cycling”: Bike Outreach Poster - reformatted layout to improve text legibility in (Spanish, Chinese and English)
  - “Under the L” Sunset Park event:
    - Designed postcards “Free Interpretation” (English, Spanish & Chinese)
    - Designed one poster “Free Interpretation” (English, Spanish & Chinese)
    - Designed NYC DOT identity cards (DOT logo & LA logo) to fit inside “interpreter’s vest sleeves”
  - “Summer Streets”:  
Designed “Free Interpretation” posters (24x36)  
(English, Spanish & Chinese on each board)
  - “Bike Helmet Fitting”:  
Designed “Free Interpretation” posters (24x36)  
(English, Spanish & Chinese on each board)
- 3. Digital Signage – Public Service Center (PSC) at 55 Water St**  
(4 digital signs; various language translations, see context below)
- Language Access updated, designed, and reformatted digital informational and campaign digital signage for the PSC at 55 Water Street.
  - Language Access designed Customer Holiday Notification digital signs: New Year’s Day, Martin Luther King Junior Day, Presidents’ Day, Independence Day, Labor Day, Columbus Day, Election Day, Veterans Day, Thanksgiving Day, and Christmas Day
  - For easy readability Language Access designed business hours digital signs for all PSCs and Borough Commissioner Offices based upon plain language/accessibility criteria - (digital signs will be available in these offices in the near future, awaiting Verizon Digital Signage technology approval)
  - Language Access designed “Free Interpretation” digital signs: English, Spanish, Chinese and Russian.
  - Additional digital signs were added for Business Hours, Register to Vote, Work Zone Awareness and “Summer Streets” (featured event) for the display loop
  - Additional “Left Turns are Dangerous” digital signs were added for the display loop
  - Language Access reformatted Vision Zero “Left Turns are Dangerous” campaign for digital signage

Since the onset of the Covid-19 pandemic, much of the physical NYCOT outreach has had to adapt to providing virtual translation and interpretation, both multilingual and sign language, to support all DOT outreach activities and internal NYCDOT meetings. Language Access staff actively participated at Public Hearings and Community Board Meetings. Various Community Boards do publicize NYCDOT outreach events to LEP communities through placement of advertisements in local newspapers published in languages other than English. Prior to comprehensively translating the LPRs into the ten mandated languages, which has been in full compliance since July 1, 2020.

Digital outreach includes CSLACU providing expedited translations of all Covid-19 related DOT service updates and Mayoral initiatives such as Open Streets and Open Restaurants. All translations (in the top 10



languages) have been uploaded to the NYCDOT website to keep the LEP community informed and help all customers keep their businesses and personal lives up and running.

In 2020, Language Access received the most interpretation requests (57 in 2020 vs. 56 in 2019) and assigned 122 interpreters (vs a record-setting 189 in 2019). This is due to the increased involvement of Language Access in facilitating events planned by NYCDOT operational units, which has created a strong rapport between Language Access, NYCDOT's internal groups, our DCAS-contracted interpreters, and the Limited English Proficient (LEP) public. The lower number of assigned interpreters is attributable to the limitations created by Covid-19. Providing multilingual interpretation at Zoom meetings requires fewer multilingual interpreters, as multiple interpreters are not needed to cover large geographic areas serving many LEP customers, as they did at outreach events such as Summer Streets pre-Covid-19.

It is NYCDOT's policy to advertise the availability of multilingual and ASL interpretation for all virtual and actual meetings. CSLACU has improved the technological capabilities of its LAD system for requesting these services and is training NYCDOT's employees in its use. For the Black History Month: "New Faces in New Mobility" panel held for NYCDOT employees, Language Access provided two American Sign Language (ASL) interpreters to interpret the lecture for requesting attendees. In the first half of the 2019, Language Access aided NYCDOT's Urban Design+Art+Wayfinding unit in a public survey to assess the accessibility of the WalkNYC signage posted citywide. Language Access translated the survey and provided interpreters to conduct the multilingual surveys in the following languages on five different deployments: Spanish (two at each date), Chinese (one Mandarin and Cantonese at each date), Russian (one at the Brighton Beach date), Ukrainian (one at Brighton Beach date), Korean (one at the Queensboro Plaza date), and Haitian Creole (two at the Grand Concourse date). Surveys were conducted on the sidewalks of hubs in Queen's Queensboro Plaza and Flushing, Bronx's Grand Concourse, Brooklyn's Brighton Beach, and Manhattan's Chinatown.

In July 2019, Language Access was asked by NYCDOT's Design+Art+Wayfinding unit to provide interpretation at Manhattan's Community Board 3 meeting regarding their upcoming "Gateways to Chinatown" installation to be constructed in the heart of Chinatown. Language Access provided one Spanish, one Mandarin, and one Cantonese interpreter to answer questions from the public about the design and origin of the art project.

Before NYCDOT's annual 2019 Summer Streets festival (in which Park Avenue is closed to car traffic and turned into a pedestrian and biking route), NYCDOT's Urban Design+Art+Wayfinding unit, Regional & Strategic Planning subdivision, and the Office of Freight Mobility reached out to Language Access to provide interpretation at six separate Park Avenue rest stops on the first three Saturdays in August. For all three dates, Language Access provided ASL, Spanish, Chinese (Mandarin and Cantonese), and French interpreters to staff informational booths at the event. The in-house Graphic Artist from Language Access created five multilingual posters with ASL, Spanish, and Chinese promotion to display at each of the interpretational rest stops.

In the fall of 2019, for the first time in the Unit's history, Language Access participated in DOT's Free Bike Helmet Fitting event, which occurs August through October annually. Members of Language Access, as well as Spanish (two at each date), Chinese (one Mandarin and Cantonese at each date), Russian (one date), and Arabic (one date) interpreters were trained to safely fit and distribute free bike helmets for the public. The unit attended 11 bike helmet fittings over the two months to fit and give away over 20,000 bike helmets to New Yorkers, regardless of which language they speak.

The final events of 2019 (pre-Covid-19) that Language Access took part in were merchant surveys in Sunset Park conducted by NYCDOT's Street Ambassadors. The aim of the study was to ascertain the need for alleviated delivery traffic outside the businesses 8<sup>th</sup> Avenue commerce hub. As the majority of business owners spoke at least one of many dialects of Chinese, Language Access attended the three deployments in the fourth quarter, and assisted by supplying two Mandarin, one Cantonese, one Cantonese and Fujianese, and one Mandarin-speaking member of Language Access. During Covid-19, Language Access worked with

the Street Ambassadors, all outfitted with appropriate PPE and utilizing social distancing, on their deployments in October 2020 to conduct surveys of the Jamaica Business Improvement District.

## **XI. Language Access complaints**

The public can submit complaints or concerns either through the “Contact the Commissioner” link on the NYCOT external website or by calling 311 or visiting 311 online. DOT has an established procedure for handling customer complaints. Customer complaints are routed through 311 system, into NYCDOT’s Agency Response Tracking system (ARTS) for final routing to the CSLACU mailbox “languageaccess@dot.nyc.gov.” CSLACU is responsible for reviewing, handling and responding to language access complaints.

During Language Access Policy and Procedure training (occurring post-Covid-19), NYCDOT managers, supervisors and front-line staff are informed of agency procedure for processing language access complaints, questions and requests. Additionally, to ensure that managers, supervisors and front-line staff are aware of the agency procedure, CSLACU installs and maintains signage in NYCDOT’s public service centers (PSCs) that informs customers (in the designated 10 citywide languages, plus English) of their rights to complain, question and request services. Customers are informed to call 3-1-1 or speak to a NYCDOT manager or supervisor.

The required timeframe for NYCDOT Language Access to acknowledge and/or respond to customer complaints, questions or requests is no longer than 14 days. CSLACU plans to post this established agency procedure for handling customer questions, complaints and requests on the CSLACU SharePoint pages.

The public can submit complaints or concerns, either through the “Contact the Commissioner” link on the NYCDOT external website or by calling 311 or visiting 311on-line.

Language Access/DOT did not receive any complaints from LEP customers through 311, LAD, ARTS, or through the external and internal NYCDOT websites.

NYCDOT’s previous Language Access Unit, now CSLACU, received two recommendations from the Mayor’s Office of Operation (MOO) Secret Shopper program on July 18, 2019. At our PSCs at 55 Water Street in Manhattan and 16 Court Street in Brooklyn, the DOT staffers were unable to direct the LEP/Secret Shoppers to the dual set phone to telephone Language Line for translation services, despite clear signage indicating the availability of LEP services. Once all of the Public Service Centers (PSCs) reopen, post pandemic, the PSC liaisons will receive comprehensive retraining on the array of language services available. LPR training will be included, as well.

Language Access/NYCDOT did not receive any complaints from LEP customers through 311, LAD, ARTS, or through the external and internal NYCDOT websites.

NYCDOT’s previous Language Access Unit, now CSLACU, received two recommendations from the Mayor’s Office of Operation (MOO) Secret Shopper program on July 18, 2019. At our Public Service Centers (PSCs) at 55 Water Street in Manhattan and 16 Court Street in Brooklyn, the NYCDOT staffers were unable to direct the LEP/Secret Shoppers to the dual set phone to telephone Language Line for translation services, despite clear signage indicating the availability of LEP services. All of the Public Service Center liaisons will receive comprehensive retraining on the array of language services available. LPR training will be included, as well. The MOO Secret Shoppers were the only external source of people any Language Access complaints during 2019.

## **XII. Implementation plan logistics**

**CSLACU will continue to implement its current and future goals by creating ongoing:**

- **NYCDOT compliance with LL30 and MOIA guidelines**
- **Updates to the LPR landing page with dedicated icons on the NYCDOT website**
- **New programs, program updates, and service updates translated into the top ten languages:**
  - **Rapid deployment of Covid-19 Alerts to NYCDOT service modifications**
  - **Open Streets and Open Boulevards: ongoing program updates**
  - **Open Restaurant: continuous applications introduced through DOT homepage online link. New restaurants are applying and all restaurants must renew their current applications every year.**
  - **Current and future Social Media Alerts delivered to the public**
  - **Current and future Mayoral Initiatives**
- **Direct access to translation and interpretation services for agency operational managers and LEP customers**
- **Direct document access for the public, including translated information**
- **Opportunities and methods for the public to share their ideas with and provide feedback to NYCDOT**

Language Access Goal	Milestones	Deadline	Staff Responsible
<p><b><u>NYCDOT Licenses, Permits, and Registrations (LPRs) :</u></b>            Create and update website portal to LPRs translated into the City's top 10 languages</p>	<p>NYCDOT met the July 2020 roll-out date and created equal access to all 51 LPRs for LEP customers. The new LPR portal also adheres to ADA graphic accessibility standards. New LPRs will be added as they are created or existing LPRs are revised.</p>	<p><b>July 1, 2020 and will update as new DOT LPRs are added.</b>   <b>Ongoing updates.</b></p>	<p><b>CSLACU, IT&amp;T, and Strategic Communications</b></p>
<p><b><u>Language Access Database (LAD):</u></b>            Enhanced LAD user experience with additional improvements to the technology, accessibility, layout, and submittal process. <b>Future plans are underway to upgrade the use and technology of LAD.</b></p>	<p>LAD was upgraded with a new user interface, improving accessibility to all aspects of the program. - Submittal of translation and interpretation requests is streamlined.            - <b>CSLACU is conducting LAD training for NYCDOT divisions.</b></p>	<p><b>February 2021 and</b>   <b>Provide continuous updates as DOT needs arise at Ops Units.</b></p>	<p><b>CSLACU and IT&amp;T</b></p>
<p><b><u>Essential Documents (EDs)/ Most Commonly Distributed Documents (MCDs):</u></b>            Continuously upgrade Essential Documents and eliminate obsolete documents</p>	<p>- Maintain new tracking database for EDs/MCDs.            - <b>Update List of EDs biannually</b>            - <b>All new documents will be converted into plain language, as appropriate, post-Covid-19 hiatus.</b></p>	<p><b>Ongoing</b>   <b>Twice Yearly</b>  <b>Ongoing</b></p>	<p><b>CSLACU</b>   <b>CSLACU and NYCDOT</b>  <b>CSLACU</b></p>
<p><b><u>Plain Language Initiatives:</u></b>            CSLACU scrutinized work product of plain language consultant and consulted with operational units for whom documents were revised to plain language versions.   <b>CSLACU is developing a program to educate and train DOT's Planning and Operational Managers to identify existing and upcoming documents for wide distribution and assist them in converting them to Plain Language before translating them into the top ten languages.</b></p>	<p>-<b>NYCDOT eliminated costly Plain Language consultant contract and brought this program in-house.</b>            - CSLACU creating new Plain Language version of PPPD Brochure.            - <b>In 2021, PPA will roll out a portal of plain language documents translated into the top 10 languages.</b>            - <b>CSLACU will create plain language versions of additional Essential Documents, post-Covid-19 hiatus.</b>            - <b>CSLACU is also researching various Plain Language websites and software developers to determine their effectiveness in expanding our toolbox.</b></p>	<p><b>January 2019</b>  <b>Ongoing in-house implementation.</b>   <b>Fall 2021</b>   <b>Fall 2021</b>   <b>Ongoing</b>   <b>Ongoing</b></p>	<p><b>CSLACU</b>   <b>CSLACU</b>  <b>PPA, CSLACU, IT&amp;T</b>   <b>CSLACU</b>   <b>CSLACU</b></p>
<p><b><u>Glossary of Commonly Used Transportation-related Terminology:</u></b>  <b>CSLACU is currently examining the efficacy of pursuing this program, as it has limited application at present. Budgetary restrictions under Covid-19 have placed non-essential programs on hiatus.</b></p>	<p>- CSLACU continues to maintain its existing glossary which is currently available in Spanish, Traditional Chinese, and Russian.            - Secondary review was conducted for each of the translated terms and will continue as glossary grows.</p>	<p><b>Ongoing</b>   <b>2019 and Ongoing</b></p>	<p><b>CSLACU</b>   <b>Leticia Molinero, Now GV Solutions and LLTS</b></p>

<p><b>Literature Requests:</b> Continue to eliminate distribution backlog. Identify ED/ MCDs most needed in translation and translate them,</p>	<p>- CSLACU eliminated the backlog of 3,500 Literature Requests and improved the turnaround time from 30 days to 2 days. - Literature requests are now being input into the Agency Response Tracking System (ARTS) to enable tracking and follow-up on returned envelopes.</p>	<p>November 2019 and Ongoing</p> <p>Ongoing</p>	<p>CSLACU</p> <p>CSLACU</p>
<p><b>Language Access Goal</b></p>	<p><b>Milestones</b></p>	<p><b>Deadline</b></p>	<p><b>Staff Responsible</b></p>
<p><b>Expand the Use of Verizon Message Boards:</b> Distribute the system throughout the boroughs, post pandemic.</p>	<p>CSLACU is working on expanding the use of the Verizon Message Boards with plans to install them at all NYCDOT Public Service Centers, once they reopen post Covid-19. This will create geographically and demographically targeted communications and increase the Agency's reach.</p>	<p>Installation of Message Boards will resume post-Covid-19.</p> <p>Ongoing updates.</p>	<p>CSLACU Graphic Designer and IT&amp;T</p>
<p><b>Incorporate ADA Standards in DOT Communications</b></p>	<ul style="list-style-type: none"> <li>• Train DOT CSLACU staff</li> <li>• Incorporate ADA standards into <ul style="list-style-type: none"> <li>- Written Communications</li> <li>- Virtual and Actual Presentations</li> <li>- Digital Content</li> </ul> </li> </ul>	<p>Ongoing</p>	<p>DOT Creative Services, CSLACU Graphic Designer, and CSLACU Staff</p>
<p><b>Improve Language Access Contracts</b></p>	<ul style="list-style-type: none"> <li>• Participation in MOIA's RFP panel to assist DCAS in creating a more comprehensive scope of work for the City translation and interpretation service contracts will resume, once Covid-19 LEP initiative is completed</li> <li>• Solicit new vendors, expanding our M/WBE outreach</li> <li>• Created new cost-sharing and cost containment guidelines for NYCDOT. SOPs are ready to deploy for <ul style="list-style-type: none"> <li>- Document Translation</li> <li>- Interpretation</li> </ul> </li> <li>• Hold contractors accountable: <ul style="list-style-type: none"> <li>- Clarify Language Access requirements</li> <li>- Supervise and follow-up with contractor's work product</li> <li>- Higher level of NYCDOT oversight and scrutiny of invoices</li> </ul> </li> </ul>	<p>Post Covid-19</p> <p>Ongoing</p> <p>February 2021, Implementation ongoing</p> <p>Ongoing</p>	<p>CSLACU, MOIA, and Other City Agencies</p> <p>CSLACU</p> <p>CSLACU</p> <p>CSLACU</p>



NYC Parks

# Language Access Plan

**City of New York Parks & Recreation**

Parks Citywide Operations

July 2021

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Appendix 1: Top Languages by NYC Borough Community Districts for Manhattan

Appendix 2: Top Languages by NYC Borough Community Districts for Bronx

Appendix 3: Top Languages by NYC Borough Community Districts for Brooklyn

Appendix 4: Top Languages by NYC Borough Community Districts for Queens

Appendix 5: Top Languages by NYC Borough Community Districts for Staten Island

## **I. Introduction**

This Language Access Plan for the New York City Department of Parks & Recreation (NYC Parks) has been prepared in accordance with Local Law 30 and outlines the agency's current and planned actions to improve access to programs and services by limited-English proficient (LEP) persons.

The plan is being developed by NYC Parks' Community Outreach & Partnership Development division in coordination with units and divisions throughout the agency and with the Mayor's Office of Operations and Mayor's Office of Immigrant Affairs.

Name and title of Language Access Coordinator:

Karina Smith, Chief of Staff for Community Outreach & Partnership Development

## **II. Agency Mission and Background**

### **Mission**

As stewards of nearly 14 percent of New York City's land, the New York City Department of Parks & Recreation (NYC Parks) builds and maintains clean, safe and accessible parks citywide and programs those parks with recreational, cultural and educational activities for people of all ages. Through this work, NYC Parks improves people's lives, providing outlets for creative expression, opportunities for healthy recreation, and exposure to the restorative beauty of the natural world.

### **Recreational Facilities and Pools**

NYC Parks manages 36 recreation centers, 55 outdoor pools and 12 indoor pools that provide direct recreational, athletic and educational services to New Yorkers of all ages with a special stress on youth programming. Walk-in centers have regular front desk and facility staffing during all open hours.

### **Permit Offices and Administrative Headquarters**

NYC Parks manages six permit offices, one at each borough headquarters office and a citywide permit office at the Arsenal in Central Park. The permit offices coordinate ballfield, special events, tennis and other permitted functions. Our main administrative buildings house the various units that operate the parks system, including forestry offices, which process forestry and treerelated permits.

### **Concessions, Non-profit Partnerships, and Special Events**

NYC Parks manages a wide variety of services through private-sector concession agreements such as food carts, tennis bubbles, golf courses, and restaurants. Parks also provides services in partnership with non-profit organizations such as the Historic House Trust, the Wildlife Conservation Society, the Central Park Conservancy, the Prospect Park Alliance, and many others. Parks also hosts special events of all types citywide, both produced by in-house staff and in coordination with private sponsors and organizers. Events include performances, cultural events, holiday celebrations, athletic events and more.

### **Parks Enforcement and Lifeguarding**

Through the Parks Enforcement Program (PEP) and our beach and pool lifeguards, Parks enforces rules and addresses quality of life infractions and keeps persons safe.



## **Maintenance and Operation of Public Spaces**

NYC Parks operates and maintains a wide variety of public spaces including parks, gardens, ballfields, courts, sitting areas, comfort stations, beaches, and bikeways. NYC Parks has fixed post staff at some sites but maintains most spaces with mobile crews. In most cases, there is no formal intake or assigned staffing at the entrances to Parks public spaces.

## **III. Agency Language Access Policy and Goals**

All individuals, including those with Limited English Proficiency (LEP), who request services from NYC Parks must be treated respectfully and professionally. All LEP persons have the right to free interpretation services provided by NYC Parks and should never be turned away – **language should not be a barrier to receiving services.**

- Language Identification Posters should be prominently placed at all walk-in facilities (recreation centers, marinas, permit offices, nature centers). “I speak” cards may also be utilized to inform persons that interpretation services are available as well as to help identify the primary language that persons speak.
- Phone interpretation services are always available in more than 100 languages currently through Voiance. To access phone interpretation services, staff are directed to call Central Communications at 646.613.1200 and request an interpreter for the language specified by the person.
- Parks signs, flyers, and other printed materials should be offered in multiple languages. For translations of printed materials, please email [Tiffany.Maynard@parks.nyc.gov](mailto:Tiffany.Maynard@parks.nyc.gov) with your request.
- Staff should make an effort to offer interpreters for meetings with persons where needed and/or requested. To arrange an interpreter for a meeting, please email [Tiffany.Maynard@parks.nyc.gov](mailto:Tiffany.Maynard@parks.nyc.gov) with your request.
- Persons may bring someone to interpret for them (preferably an adult), but they are not required to do so.

## **Goals of Parks’ Language Access Plan**

Guided by Local law 30, NYC Parks’ main goals and timetables for its language access plan are as follows:

- To use 2010 Census data to do a new population needs assessment. This population assessment will help ensure the agency is providing appropriate language services in city parks and park facilities.
- To provide clear access for LEP persons at all of our in-house managed recreation centers, pools, and permit offices through signage, translated documents, and interpretation services. NYC Parks currently provides signage in the following eleven languages:

- English, Spanish, Russian, Chinese, French/Haitian Creole, Polish, Korean, Arabic, Bengali, Urdu and Italian. Surveys of customers and staff, and specific requests will be used to determine the languages used on signage and which materials are most effective to translate.
- To train all staff, especially staff at recreation centers, pools and permit offices, to assist LEP persons and to understand the goals and tools involved with this plan. Currently, all newly hired staff participate in an orientation, which includes language access training. Agency Parks Opportunity Program participants (POP workers) also receive a training in language access services as part of their onboarding. The Parks Enforcement Patrol division will be encouraged to participate in the Cultural Sensitivity Training offered by DCAS. NYC Parks aims to train and/or provide a refresher course to all front-line staff where needed, and the Director of Training at NYC Parks will manage this effort.
- To promote the availability of interpretation services by posting standard signage developed by the Mayor's Office of Immigrant Affairs.
- To promote the availability of translation services to Parks managers and supervisors and encourage the development of targeted local signage, program flyers, and other materials based on the needs of specific communities.
- To translate most commonly distributed documents into 10 languages, translate main rules signs, facility information and volunteer information into multiple languages, and to host this material on the Parks website.
- To encourage more staff to sign up to be volunteer translators in the NYC Parks Volunteer Language Bank. There are currently 12 Parks employees serving in the Volunteer Language Bank; of those, 5 have received NYC Certification by the Mayor's Volunteer Language Bank.
- To update this Language Access Plan triennially each January

#### **IV. NYC Parks' Language Access Accomplishments and Progress on Goals from Previous LAIP**

Until 2020 Census data becomes widely available, NYC Parks will continue to use 2010 Census data to inform our population needs assessments.

We continue to provide clear access for LEP persons at all of our in-house managed recreation centers, pools, and permit offices through signage, translated documents, and interpretation services.

To better assist LEP persons and to understand the goals and tools involved with this plan, we continue provide mandatory language access training for all newly hired staff, (especially those at recreation centers, pools and permit offices). Agency Parks Opportunity Program participants (POP workers) also receive training in language access services as

part of their onboarding. We now provide annual language access training for current public facing staff in Public Programs including Recreation, Urban Parks Service (Rangers), Parks Enforcement Patrol (PEP), Aquatics, Education and Wildlife, and Media and Education. We continue to train and/or provide a refresher courses in language access services to all front-line staff where needed, and the Director of Training at NYC Parks will manage this effort.

To promote the availability of interpretation services at our in house managed facilities utilized by the public, we have provided and posted updated standard language access signage developed by the Mayor's Office of Immigrant Affairs.

We continue to promote the availability of translation services to Parks' managers and supervisors and encourage the development of targeted local signage, program flyers, and other materials based on the needs of specific communities.

We continue to translate our most commonly distributed documents into the 10 designated citywide languages, translate main rules signs, facility information and volunteer information into multiple languages, and to host translated material on the NYC Parks website.

We continue to encourage more staff to sign up to be volunteer translators. There are currently 11 Parks employees serving in the Volunteer Language Bank; of those, 5 have received NYC Certification by the Mayor's Volunteer Language Bank.

## **V. LEP Population Assessment**

NYC Parks will take the following steps to assess the LEP populations we serve and to offer the widest level of language access possible:

NYC Parks will provide park, playground, recreation center, and pool and beach signs in Spanish, Russian, Chinese, Polish, French/Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, and English.

NYC Parks will provide interpretation services in all available languages, including Spanish, Russian, Chinese, Polish, French/Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, and English, through its in-house Language Bank, Accurate Communications, and/or Voiance (where more than 100 languages are available telephonically).

NYC Parks will provide translation services in all available languages, including Spanish, Russian, Chinese, Polish, French/Haitian Creole, Korean, Italian, Bengali, Arabic, and English, through its in-house Language Bank and/or Language Line.

For other translated materials, NYC Parks will use surveys of customers and staff, and specific requests, to determine which materials and languages are the most effective to translate.

NYC Parks will utilize the US Department of Justice “Four Factor Analysis” to guide which LEP populations to prioritize:

- DOJ Factor 1: Based 2010-2014 U.S Census Bureau American Community Survey Public Use Microdata Analysis (PUMA) compiled by the NYC Department of City Planning, NYC Parks has summarized for park and facility managers the percentage of LEP populations in each community district. Park sites and facilities are open to the general public for free or minimal cost and we estimate that our service populations mirror the demographics of the general public in these community districts. Accordingly, Parks uses this information to target translation services and local signage in each borough. *See Appendices 1 – 5 for borough community district breakdowns.*
- DOJ Factor 2: NYC Parks will use data from translation/interpretation vendor usage, customer and staff requests, and other requests to determine actual demand for language access services. NYC Parks will adjust our specific services as necessary to meet actual demand and encourages park managers, administrators and outreach coordinators to meet with local community and partnership groups to tailor access services in local parks and communities.
- DOJ Factor 3: NYC Parks will and has been assessing the nature and importance of services in prioritizing language access services. As stewards of more than 33,000 acres of land in New York City, we provide critical open space, information and services to the public in a variety of ways, including, but not limited to:
  - Public programs and an abundance of free services for our youngest through oldest New Yorkers services
  - Citywide Special Events and local permits
  - Public/Community engagement events, town halls, and meetings.
- DOJ Factor 4: As discussed more below, NYC Parks will leverage its current scope and diversity of resources to expand language access services. NYC Parks has its own sign-making shops, new media offices, partnerships and community outreach programs, central communications, telecommunications, and training divisions. All of these resources and more will be involved in the Language Access Implementation Plan. Parks will also call upon the diversity of full-time staff to help provide on-site and Language Bank interpretation and translation services. Parks will coordinate with other City agencies and our non-profit partners to improve these services as well.

In recognition of the importance of these services to the civic participation of all the communities of our City, NYC Parks, through this Language Access Implementation Plan, lays out how it will ensure New Yorkers with Limited English Proficiency have meaningful access to its information and services.

## **VI. Provision of Language Access Services**

### **Translation and Interpretation Services and Access to Languages Beyond Top 10:**

Requests for translation and interpretation will be managed and received by the office of Community Outreach & Partnership Development/Parks' Language Access Coordinator.

NYC Parks will work to have multilingual staff assigned to front desks at recreation centers and permit offices to the extent possible, matching the most in-demand languages, including Spanish, Russian, Chinese, Polish, French/Haitian Creole, Korean, Italian, Bengali, Arabic, and Urdu. Parks already possesses a high level of bilingual staff capacity at many centers.

NYC Parks will continue to provide interpretation and translation services at public events by request, as well as preemptively where possible. When requested in advance, NYC Parks will provide interpretation and translation services in languages beyond the top 10 designated Citywide languages established by LL30 of 2017.

NYC Parks will continue to develop its internal Language Bank by soliciting volunteers from employees throughout the agency.

NYC Parks will also provide access to Voiance at walk-in facilities utilizing handset phones. Central Communications will act as a clearinghouse for these requests as well, ensuring a one-stop location for attaining interpretation services.

NYC Parks will continue use of "I speak" cards and Language Identification posters to identify the primary language of LEP persons and will instruct staff on how to communicate that primary language effectively to Central Communications if resources outside the facility are needed.

### **Language Access in Agency Communication and Use of Plain Language**

NYC Parks' list of essential documents for implementation in this plan include: licenses, permits, registrations and application instructions; targeted special event notices; key information in the service, facility and FAQ materials.

To the extent possible and in consultation with the Parks Legal Office, NYC Parks will work to simplify documents using plain language, symbols, and other graphics to make information as readily accessible as possible. Parks will work to provide access to maps through our website utilizing symbols for features and services like basketball courts or bathrooms in each park. Parks' Language Access training and Voice and Tone Guidelines specifically addresses the importance of utilizing plain language in correspondence and public facing documents and provides access to additional plain language tools/resources.

Parks will target for implementation translations of documents and languages determined in surveys of staff and customers to be most critical and likely to be utilized.

NYC Parks has contracts for interpretation services with Voiance and Accurate Communications, translation services with Language Line, and also provides translation services and quality control using its internal Language Bank.

NYC Parks provides interpretation services for public engagement/community outreach meetings both proactively and upon request. All public information on NYC Parks' website is available in multiple languages utilizing the Google Translate feature.

### **Free Interpretation Signage:**

NYC Parks produces its own signs at in-house sign shops and also through sign contract services. NYC Parks will continue to produce signage in the following eleven languages: English, Spanish, Russian, Chinese, Polish, French/Haitian Creole, Korean, Italian, Bengali, Arabic, and Urdu, and incorporate utilization of universal symbols.

NYC Parks will use "I speak" cards and Language Identification posters at walk-in facilities, and also post standard signage developed by other agencies to promote the presence of interpretation services.

NYC Parks has installed enclosed post boards at over 500 outdoor park locations. Under the supervision of local park managers, Parks will continue to post appropriate foreign language event notices and other materials on those boards.

NYC Parks will take the following steps to create public awareness of language assistance services, and to reach out to LEP communities:

Parks has translated its main rules and entry signs in the most common languages, including English. This, in conjunction with LEP posters and "I speak" cards, will ensure a wide public dissemination of these offerings.

NYC Parks includes language access in training for all staff, especially staff at recreation centers, pools and permit offices, as both a refresher training and ongoing customer service training.

NYC Parks will include language access training as a part of agency EEO training, and annual recertification training for Urban Park Service Parks Enforcement staff, and as well as Park Rangers.

NYC Parks will continue to work with its Park Administrators and non-profit partner organizations to promote language access initiatives in our largest parks and will encourage all park managers and outreach coordinators to meet with local community and partnership groups to promote the availability of these services in local parks and communities.

NYC Parks will work with the Partnerships for Parks program to promote language access services and encourage and support volunteerism by LEPs.

NYC Parks will promote language access through multilingual special events and public programs.

## Emergency Preparedness & Response

In the event of an emergency declared by NYC Emergency Management (NYCEM), Parks will communicate and continue to provide services to LEP customers by updating our website with directions and content distributed by NYCEM.

NYC Parks provides access to website translation, and where possible, will send multilingual staff to provide onsite services and facilitate effective communications. If additional signage or services in unsupported languages are needed at an emergency site, NYCEM will handle the request and ensure these services are provided.

For emergency calls that come into our Central Communications office, we will use our current telephonic language access vendor (Voiance) to provide interpretation accordingly.

## Licenses, Permits, and Registrations

To the extent possible and in consultation with the Parks Legal Office, NYC Parks will work to simplify documents using plain language, symbols, and other graphics to make information as readily accessible as possible.

NYC Parks will provide courtesy translated copies of Parks-issued licenses, permits and/or registrations (LPRs), as well as application instructions upon request. The information in this courtesy copy of the aforementioned documents will be translated from the official, English language document, which will be provided along with the courtesy copy. Some translated information may not precisely match the intended meaning in the official document. Therefore, **only the English-language document is official**. If there is any conflict between the courtesy copy and the official version, then the official version shall govern.

## VII. Training

Parks will take the following steps to introduce the Language Access Plan to staff including frontline teams, and will incorporate language access into our long-term training efforts:

- Through Parks Public Programs and Training divisions, recreation center and permit office managers, supervisors and front desk staff receive training and hands-on practice in implementing language access including interpretation services, using “I speak” cards and Language Identification posters, requesting translation services, and required signage.
- Language access has been built into Parks standard Field Operations Training, which is mandatory for all new full-time field employees, both supervisory and entry-level. Language access will be a component of an expanded customer service section.
- Language access will be taught to all Public Programs employees as part of Parks Training Academy’s Customer Service Training program. Parks will re-train all Public Programs staff, as well as other agency staff, in the revised customer-service training curriculum.
- Broadcast emails and/or the Parks Plant will provide an introduction, updates, and information about our Language Access Plan to all staff.
- All language access training and distributional materials will be hosted on the Parks Intranet for access by all staff.
- A monthly health and safety topic will be written to address language access and solicit participation in the agency language bank. All field staff currently participate in monthly health and safety topic reviews, and language access will be a topic one month per year.
- Targeted training and orientation will be provided for Central Communications, Public Program managers and Language Bank volunteers regarding the operation of Language Line and the internal Language Bank.
- The language access plan has been and will continue to be addressed in regular senior-level meetings.
- Parks’ EEO office currently conducts cultural sensitivity training as part of mandatory EEO training for all staff. Parks will work to incorporate language access into that training as well.

Timeline:

- Parks’ Deputy Commissioner for Urban Park Services & Public Programs organizes ongoing training for Urban Parks Services Staff and Public Programs staff at recreation centers and permit offices upon hire, as well as annual staff summits and mandatory recertification.
- Parks’ Director of Training has revised our Field Operations and Customer Service training curriculum and implements customer service and language access training on an ongoing basis.



- Parks' Assistant Commissioner for Equal Employment Opportunity will work to incorporate language access into ongoing mandatory training for Parks staff and new hires.
- Parks' Assistant Commissioner for Compliance and the Director of Health and Safety will prepare and finalize a health and safety topic addressing language access for all field staff and implement by Spring/Summer 2022.
- All general promotion and instruction regarding the program, including the posting of intranet materials, will be ongoing through the office of Community Outreach & Partnership Development.

## **VIII. Record Keeping and Evaluation**

Parks will take the following steps to ensure the quality of language access services:

- Parks will utilize Language Bank volunteers and community-based organizations to quality check translated materials. Parks will focus on translating documents that will most be in demand and will use surveys to determine these areas of most demand.
- Parks will formally report on the quality of language access at each walk-in facility at least once per year. Parks has developed an inspection report to cover signage, availability of translated materials, and language identification posters, and added this to our Operations and Management Planning (OMP) inspection program, as well as to our Agency Compliance survey program.
- Parks will work with community-based organizations to check the effectiveness of language access at walk-in facilities.

Parks will maintain the following records:

- Parks will track all language line interpretation and translation services and costs through our Central Communications and Community Outreach offices. This will be reported internally on a quarterly basis.
- Parks will track the number and type of translated signs produced annually.
- Parks Community Outreach division will, to the extent practical, maintain digital copies of all translated documents and record the number of translated documents.

Parks will monitor overall compliance with the local law by:

- The annual assessment and inspection of language access at walk-in centers.
- An annual review of translated sign production.
- Annual review of correspondence received via 311 LEP reporting.

## **IX. Resource Analysis and Planning**

Parks will take the following steps to implement this plan using existing agency and interagency resources:

Parks' in-house sign shop will prepare and produce all signage within the current signs budget.

Parks will continue to develop its in-house Language Bank using volunteers and rewarding staff through incentives, awards, training opportunities and events.

Parks will use "I speak" cards, Language Identification posters, and other materials in its program.

Parks will use City contracts with Voiance, Accurate Communications, and Language Line, or an equivalent, to augment translation services and provide back-up interpretation services. To monitor costs, only Parks Central Communications and Community Outreach are able to directly spend against the contract. All Language Access vendor invoices will be sent to the Language Access Coordinator in the Office of Community Outreach. Parks will monitor monthly costs for this contract and assess program implementation accordingly. Parks will work to identify the most potential in-demand essential documents and languages and will prioritize translations accordingly.

Parks will work with the Mayor's Office of Immigrant Affairs to access any available citywide resources to assist in its language access efforts.

## **X. Outreach and Public Awareness of Language Access Services**

With New York City as one of the most heavily populated and diverse cities in the world, NYC Parks is committed to emphasizing cultural inclusion in its policies and operations, including providing language assistive services. To facilitate public awareness regarding the availability of our language access services, NYC Parks will take the following steps:

- Parks will continue to use "I speak" cards, and post Language Identification posters and Free Interpretation posters in plain view at its public facilities.
- Parks will continue to train all staff, especially front-line staff at recreation centers, pools and permit offices, to assist LEP persons, and provide translation services in a timely manner.
- Parks will continue to promote the availability of translation services to Parks managers and supervisors, and encourage the development of targeted local signage, program flyers, and other materials based on the needs of specific communities.
- Parks will continue to translate essential documents into 10 languages, translate main rules signs, facility information and volunteer information into multiple languages, and to host this material on the Parks website.

- Parks will continue to work with the Partnerships for Parks program to promote language access services and encourage and support volunteerism by LEPs.
- Parks will continue to promote language access through multilingual special events and public programs.

## **XI. Language Access Complaints**

NYC Parks monitors and responds to public complaints, inquiries, and comments about language access submitted via 311, as well as other internal complaint processes, via our agency's Commissioner's Correspondence tracking system.

Official customer correspondences received by our Commissioner's office are fielded to the appropriate Parks division for an appropriate resolution/response. Should the correspondence inquiry arrive in a language other than English, the correspondence is forwarded to the current written translation vendor, Geneva Worldwide. Upon completion of the correspondence's translation by the vendor, the agency response is returned to the customer in the original language identified or requested.

Language Access inquiries received via the Commissioner's Correspondence tracking system is reported to the agency's Language Access Coordinator annually.

## XII. Implementation Plan Logistics

NYC Parks is hard at work on many aspects of the language access plan. These include translating signage, and regular trainings for both new and experienced staff.

Language Access Goal	Milestone	Deadline
NYC Parks will continue to use Language Line, Voiance, Accurate Communications, and an internal Language Bank to provide translation and interpretation services, with procedures in place for its Central Communication division to coordinate these interpretive services.	Ongoing	Annually (fiscal year)
NYC Parks will continue to update and/or replace existing park and playground rules signs in the top two languages in a Community Board based on census data, as well as English. Signs will include universal symbols to aid in translation.	Ongoing	Annually (fiscal year)
As the agency budget allows, NYC Parks will continue to update and/or replace walk-in center signage in the top two languages in a Community Board based on census data, as well as English.	Ongoing	Annually (fiscal year)
NYC Parks will continue training and refresher training for all staff, especially staff at recreation centers, pools, and permit offices, to assist LEP persons and to understand the goals and tools involved with this plan.	Ongoing	Annually (calendar year)
NYC Parks will continue formal training in language access to field-level staff as part of ongoing customer service training. The timeline for this can be found under Section V "Training.	Ongoing	Annually (calendar year)
NYC Parks will work with our Information Technology and Innovation Performance Management divisions to develop a database that will assist in tracking staff trained in language access services, documents most commonly requested for translation, and number of translation requests in the top 10 designated citywide languages, etc.	Fall 2021	End of FY23

NYC Parks has assigned the Chief of Staff for Community Outreach & Partnership Development to serve as our agency Language Access Coordinator. Working with the Deputy Commissioner for Urban Parks Service and Public Programs, the Deputy Commissioner for Operations, the Deputy Commissioner for Administration, the Assistant Commissioner for

Agency Communications, the Assistant Commissioner for Compliance, Assistant Commissioner for Budget, Fiscal Management and Personnel, and the Agency Chief Contracting Officer, the Language Access Coordinator will monitor implementation of the language access plan with the Director of Training, New Media office, the Signage Upgrade program, and other relevant staff and units. Throughout this plan, Parks has indicated the offices and/or staff titles responsible for implementing specific parts of the plan.

Top Languages by New York City, Borough, PUMAs/Community Districts: Manhattan  
 Universe: Population 5 years and over  
 2010-2014 American Community Survey Public Use Microdata 5-Year Sample

PUMA 3801: Manhattan Community District 12-- Washington Heights, Inwood & Marble Hill		
	Total	Percent
<b>Total</b>	<b>201,826</b>	<b>100.0%</b>
English Only	54,728	27.1%
Language other than English	147,098	72.9%
<b>LEP</b>	<b>80,625</b>	<b>39.9%</b>
Spanish	76,590	37.9%
Chinese*	945	0.5%
Russian	608	0.3%
Greek	365	0.2%
Japanese	348	0.2%
Other LEP	1,769	0.9%

PUMA 3802: Manhattan Community District 9-- Hamilton Heights, Manhattanville & West Harlem		
	Total	Percent
<b>Total</b>	<b>125,102</b>	<b>100.0%</b>
English Only	61,985	49.5%
Language other than English	63,117	50.5%
<b>LEP</b>	<b>25,278</b>	<b>20.2%</b>
Spanish	20,298	16.2%
Chinese*	1,596	1.3%
French	623	0.5%
Korean	341	0.3%
Fulani	312	0.2%
Other LEP	2,108	1.7%

PUMA 3803: Manhattan Community District 10--Central Harlem		
	Total	Percent
<b>Total</b>	<b>120,922</b>	<b>100.0%</b>
English Only	84,145	69.6%
Language other than English	36,777	30.4%
<b>LEP</b>	<b>13,297</b>	<b>11.0%</b>
Spanish	8,285	6.9%
French	1,513	1.3%
Fulani	751	0.6%
Chinese*	556	0.5%
French Creole	438	0.4%
Other LEP	1,754	1.5%

PUMA 3804: Manhattan Community District 11--East Harlem		
	Total	Percent
<b>Total</b>	<b>113,343</b>	<b>100.0%</b>
English Only	52,861	46.6%
Language other than English	60,482	53.4%
<b>LEP</b>	<b>23,214</b>	<b>20.5%</b>
Spanish	18,455	16.3%
Chinese*	2,158	1.9%
French	611	0.5%
Japanese	270	0.2%
Fulani	238	0.2%
Other LEP	1,482	1.3%

PUMA 3805: Manhattan Community District 8--Upper East Side		
	Total	Percent
<b>Total</b>	<b>207,726</b>	<b>100.0%</b>
English Only	154,121	74.2%
Language other than English	53,605	25.8%
<b>LEP</b>	<b>11,698</b>	<b>5.6%</b>
Spanish	3,332	1.6%
Chinese*	2,046	1.0%
French	832	0.4%
Japanese	746	0.4%
Korean	475	0.2%
Other LEP	4,267	2.1%

PUMA 3806: Manhattan Community District 7--Upper West Side & West Side		
	Total	Percent
<b>Total</b>	<b>184,183</b>	<b>100.0%</b>
English Only	132,653	72.0%
Language other than English	51,530	28.0%
<b>LEP</b>	<b>14,168</b>	<b>7.7%</b>
Spanish	6,627	3.6%
Chinese*	2,114	1.1%
Japanese	879	0.5%
French	619	0.3%
Russian	449	0.2%
Other LEP	3,480	1.9%

PUMA 3807: Manhattan Community District 4 & 5-- Chelsea, Clinton & Midtown Business District		
	Total	Percent
<b>Total</b>	<b>140,315</b>	<b>100.0%</b>
English Only	96,856	69.0%
Language other than English	43,459	31.0%
<b>LEP</b>	<b>13,191</b>	<b>9.4%</b>
Spanish	5,265	3.8%
Chinese*	2,380	1.7%
Korean	1,480	1.1%
Japanese	799	0.6%
Russian	686	0.5%
Other LEP	2,581	1.8%

PUMA 3808: Manhattan Community District 6--Murray Hill, Gramercy & Stuyvesant Town		
	Total	Percent
<b>Total</b>	<b>140,373</b>	<b>100.0%</b>
English Only	102,747	73.2%
Language other than English	37,626	26.8%
<b>LEP</b>	<b>8,355</b>	<b>6.0%</b>
Chinese*	1,643	1.2%
Spanish	1,581	1.1%
Japanese	1,238	0.9%
French	635	0.5%
Korean	604	0.4%
Other LEP	2,654	1.9%

PUMA 3809: Manhattan Community District 3-- Chinatown & Lower East Side		
	Total	Percent
<b>Total</b>	<b>157,698</b>	<b>100.0%</b>
English Only	72,404	45.9%
Language other than English	85,294	54.1%
<b>LEP</b>	<b>44,537</b>	<b>28.2%</b>
Chinese*	30,466	19.3%
Spanish	10,708	6.8%
Polish	397	0.3%
Japanese	380	0.2%
Bengali	371	0.2%
Other LEP	2,215	1.4%

PUMA 3810: Manhattan Community District 1 & 2-- Battery Park City, Greenwich Village & Soho		
	Total	Percent
<b>Total</b>	<b>143,876</b>	<b>100.0%</b>
English Only	106,269	73.9%
Language other than English	37,607	26.1%
<b>LEP</b>	<b>10,206</b>	<b>7.1%</b>
Chinese*	4,510	3.1%
Spanish	2,347	1.6%
Japanese	578	0.4%
Korean	393	0.3%
Polish	346	0.2%
Other LEP	2,032	1.4%

\* Includes Chinese, Cantonese, Mandarin, and Formosan

Sources: U. S. Census Bureau, 2010-2014 American Community Survey Public Use Microdata 5-Year Sample  
 Population Division – New York City Department of City Planning (March 2016)

Top Languages by New York City, Borough, PUMAs/Community Districts: The Bronx  
 Universe: Population 5 years and over  
 2010-2014 American Community Survey Public Use Microdata 5-Year Sample

PUMA 3701: Bronx Community District 8--Riverdale, Fieldston & Kingsbridge		
	Total	Percent
<b>Total</b>	<b>100,792</b>	<b>100.0%</b>
English Only	47,196	46.8%
Language other than English	53,596	53.2%
<b>LEP</b>	<b>19,976</b>	<b>19.8%</b>
Spanish	15,105	15.0%
Russian	793	0.8%
Chinese*	622	0.6%
Korean	615	0.6%
Albanian	271	0.3%
Other LEP	2,570	2.5%

PUMA 3702: Bronx Community District 12--Wakefield, Williamsbridge & Woodlawn		
	Total	Percent
<b>Total</b>	<b>131,973</b>	<b>100.0%</b>
English Only	96,033	72.8%
Language other than English	35,940	27.2%
<b>LEP</b>	<b>12,341</b>	<b>9.4%</b>
Spanish	8,484	6.4%
Kru, Ibo, Yoruba	790	0.6%
French Creole	508	0.4%
French	417	0.3%
Italian	370	0.3%
Other LEP	1,772	1.3%

PUMA 3703: Bronx Community District 10--Co-op City, Pelham Bay & Schuylerville		
	Total	Percent
<b>Total</b>	<b>118,201</b>	<b>100.0%</b>
English Only	71,448	60.4%
Language other than English	46,753	39.6%
<b>LEP</b>	<b>11,810</b>	<b>10.0%</b>
Spanish	7,666	6.5%
Italian	1,336	1.1%
Chinese*	505	0.4%
Greek	390	0.3%
Albanian	362	0.3%
Other LEP	1,551	1.3%

PUMA 3704: Bronx Community District 11--Pelham Parkway, Morris Park & Laconia		
	Total	Percent
<b>Total</b>	<b>121,562</b>	<b>100.0%</b>
English Only	51,120	42.1%
Language other than English	70,442	57.9%
<b>LEP</b>	<b>28,336</b>	<b>23.3%</b>
Spanish	17,245	14.2%
Albanian	2,714	2.2%
Italian	1,664	1.4%
Chinese*	1,025	0.8%
Vietnamese	950	0.8%
Other LEP	4,738	3.9%

PUMA 3705: Bronx Community District 3 & 6--Belmont, Crotona Park East & East Tremont		
	Total	Percent
<b>Total</b>	<b>151,589</b>	<b>100.0%</b>
English Only	57,499	37.9%
Language other than English	94,090	62.1%
<b>LEP</b>	<b>40,068</b>	<b>26.4%</b>
Spanish	35,091	23.1%
French	930	0.6%
Mande	826	0.5%
Kru, Ibo, Yoruba	634	0.4%
Albanian	415	0.3%
Other LEP	2,172	1.4%

PUMA 3706: Bronx Community District 7--Bedford Park, Fordham North & Norwood		
	Total	Percent
<b>Total</b>	<b>115,372</b>	<b>100.0%</b>
English Only	32,351	28.0%
Language other than English	83,021	72.0%
<b>LEP</b>	<b>40,229</b>	<b>34.9%</b>
Spanish	33,516	29.1%
Bengali	1,704	1.5%
Arabic	783	0.7%
French	431	0.4%
Amharic	379	0.3%
Other LEP	3,416	3.0%

PUMA 3707: Bronx Community District 5--Morris Heights, Fordham South & Mount Hope		
	Total	Percent
<b>Total</b>	<b>121,291</b>	<b>100.0%</b>
English Only	33,458	27.6%
Language other than English	87,833	72.4%
<b>LEP</b>	<b>45,101</b>	<b>37.2%</b>
Spanish	40,447	33.3%
Kru, Ibo, Yoruba	1,947	1.6%
Mande	859	0.7%
French	473	0.4%
Fulani	444	0.4%
Other LEP	931	0.8%

PUMA 3708: Bronx Community District 4--Concourse, Highbridge & Mount Eden		
	Total	Percent
<b>Total</b>	<b>130,039</b>	<b>100.0%</b>
English Only	38,389	29.5%
Language other than English	91,650	70.5%
<b>LEP</b>	<b>44,793</b>	<b>34.4%</b>
Spanish	39,427	30.3%
French	1,536	1.2%
Kru, Ibo, Yoruba	1,161	0.9%
Mande	710	0.5%
Chinese*	491	0.4%
Other LEP	1,468	1.1%

PUMA 3709: Bronx Community District 9--Castle Hill, Clason Point & Parkchester		
	Total	Percent
<b>Total</b>	<b>172,412</b>	<b>100.0%</b>
English Only	73,451	42.6%
Language other than English	98,961	57.4%
<b>LEP</b>	<b>44,881</b>	<b>26.0%</b>
Spanish	36,473	21.2%
Bengali	3,234	1.9%
Chinese*	689	0.4%
French	671	0.4%
Arabic	668	0.4%
Other LEP	3,146	1.8%

PUMA 3710: Bronx Community District 1 & 2--Hunts Point, Longwood & Melrose		
	Total	Percent
<b>Total</b>	<b>144,662</b>	<b>100.0%</b>
English Only	49,415	34.2%
Language other than English	95,247	65.8%
<b>LEP</b>	<b>49,750</b>	<b>34.4%</b>
Spanish	45,898	31.7%
French	641	0.4%
Fulani	632	0.4%
Mande	549	0.4%
Kru, Ibo, Yoruba	426	0.3%
Other LEP	1,604	1.1%

\* Includes Chinese, Cantonese, Mandarin, and Formosan

Top Languages by New York City, Borough, PUMAs/Community Districts: Brooklyn  
 Universe: Population 5 years and over  
 2010-2014 American Community Survey Public Use Microdata 5-Year Sample

PUMA 4001: Brooklyn Community District 1-- Greenpoint & Williamsburg		
	Total	Percent
<b>Total</b>	<b>137,114</b>	<b>100.0%</b>
English Only	61,937	45.2%
Language other than English	75,177	54.8%
<b>LEP</b>	<b>32,316</b>	<b>23.6%</b>
Spanish	13,272	9.7%
Yiddish	8,470	6.2%
Polish	5,362	3.9%
Chinese*	2,294	1.7%
Hebrew	389	0.3%
Other LEP	2,529	1.8%

PUMA 4002: Brooklyn Community District 4-- Bushwick		
	Total	Percent
<b>Total</b>	<b>129,357</b>	<b>100.0%</b>
English Only	47,702	36.9%
Language other than English	81,655	63.1%
<b>LEP</b>	<b>43,199</b>	<b>33.4%</b>
Spanish	39,567	30.6%
Chinese*	1,267	1.0%
French Creole	574	0.4%
Arabic	240	0.2%
Tagalog	232	0.2%
Other LEP	1,319	1.0%

PUMA 4003: Brooklyn Community District 3--Bedford- Stuyvesant		
	Total	Percent
<b>Total</b>	<b>125,985</b>	<b>100.0%</b>
English Only	86,242	68.5%
Language other than English	39,743	31.5%
<b>LEP</b>	<b>15,615</b>	<b>12.4%</b>
Spanish	8,899	7.1%
Yiddish	3,403	2.7%
French Creole	567	0.5%
Chinese*	535	0.4%
French	433	0.3%
Other LEP	1,778	1.4%

PUMA 4004: Brooklyn Community District 2-- Brooklyn Heights & Fort Greene		
	Total	Percent
<b>Total</b>	<b>121,193</b>	<b>100.0%</b>
English Only	85,855	70.8%
Language other than English	35,338	29.2%
<b>LEP</b>	<b>12,365</b>	<b>10.2%</b>
Spanish	6,603	5.4%
Chinese*	1,935	1.6%
Yiddish	655	0.5%
French Creole	475	0.4%
Arabic	421	0.3%
Other LEP	2,274	1.9%

PUMA 4005: Brooklyn Community District 6--Park Slope, Carroll Gardens & Red Hook		
	Total	Percent
<b>Total</b>	<b>106,776</b>	<b>100.0%</b>
English Only	76,321	71.5%
Language other than English	30,455	28.5%
<b>LEP</b>	<b>9,305</b>	<b>8.7%</b>
Spanish	5,970	5.6%
Chinese*	712	0.7%
Russian	375	0.4%
Japanese	354	0.3%
Italian	293	0.3%
Other LEP	1,601	1.5%

PUMA 4006: Brooklyn Community District 8-- Crown Heights North & Prospect Heights		
	Total	Percent
<b>Total</b>	<b>114,944</b>	<b>100.0%</b>
English Only	89,569	77.9%
Language other than English	25,375	22.1%
<b>LEP</b>	<b>9,771</b>	<b>8.5%</b>
Spanish	4,378	3.8%
French Creole	1,333	1.2%
Chinese*	817	0.7%
Arabic	763	0.7%
Hebrew	441	0.4%
Other LEP	2,039	1.8%

PUMA 4007: Brooklyn Community District 16-- Brownsville & Ocean Hill		
	Total	Percent
<b>Total</b>	<b>113,790</b>	<b>100.0%</b>
English Only	87,850	77.2%
Language other than English	25,940	22.8%
<b>LEP</b>	<b>9,286</b>	<b>8.2%</b>
Spanish	6,983	6.1%
French Creole	750	0.7%
Chinese*	348	0.3%
Kru, Ibo, Yoruba	318	0.3%
French	311	0.3%
Other LEP	574	0.5%

PUMA 4008: Brooklyn Community District 5--East New York & Starrett City		
	Total	Percent
<b>Total</b>	<b>139,519</b>	<b>100.0%</b>
English Only	80,547	57.7%
Language other than English	58,972	42.3%
<b>LEP</b>	<b>20,975</b>	<b>15.0%</b>
Spanish	15,125	10.8%
Russian	1,708	1.2%
Bengali	1,404	1.0%
Chinese*	968	0.7%
French Creole	608	0.4%
Other LEP	1,162	0.8%

PUMA 4009: Brooklyn Community District 18-- Canarsie & Flatlands		
	Total	Percent
<b>Total</b>	<b>195,897</b>	<b>100.0%</b>
English Only	135,420	69.1%
Language other than English	60,477	30.9%
<b>LEP</b>	<b>29,250</b>	<b>14.9%</b>
French Creole	13,337	6.8%
Spanish	4,971	2.5%
Chinese*	1,912	1.0%
Russian	1,764	0.9%
Urdu	1,146	0.6%
Other LEP	6,120	3.1%

PUMA 4010: Brooklyn Community District 17--East Flatbush, Farragut & Rugby		
	Total	Percent
<b>Total</b>	<b>127,458</b>	<b>100.0%</b>
English Only	100,932	79.2%
Language other than English	26,526	20.8%
<b>LEP</b>	<b>11,418</b>	<b>9.0%</b>
French Creole	6,849	5.4%
Spanish	2,571	2.0%
French	815	0.6%
Urdu	224	0.2%
Kru, Ibo, Yoruba	170	0.1%
Other LEP	789	0.6%

PUMA 4011: Brooklyn Community District 9-- Crown Heights South, Prospect Lefferts & Wingate		
	Total	Percent
<b>Total</b>	<b>102,791</b>	<b>100.0%</b>
English Only	71,307	69.4%
Language other than English	31,484	30.6%
<b>LEP</b>	<b>12,181</b>	<b>11.9%</b>
French Creole	5,268	5.1%
Spanish	3,021	2.9%
French	824	0.8%
Hebrew	760	0.7%
Arabic	538	0.5%
Other LEP	1,770	1.7%

PUMA 4012: Brooklyn Community District 7--Sunset Park & Windsor Terrace		
	Total	Percent
<b>Total</b>	<b>139,228</b>	<b>100.0%</b>
English Only	34,408	24.7%
Language other than English	104,820	75.3%
<b>LEP</b>	<b>67,473</b>	<b>48.5%</b>
Chinese*	30,338	21.8%
Spanish	29,865	21.5%
Russian	1,239	0.9%
Polish	1,113	0.8%
Bengali	852	0.6%
Other LEP	4,064	2.9%

PUMA 4013: Brooklyn Community District 10--Bay Ridge & Dyker Heights		
	Total	Percent
<b>Total</b>	<b>122,691</b>	<b>100.0%</b>
English Only	54,828	44.7%
Language other than English	67,863	55.3%
<b>LEP</b>	<b>34,489</b>	<b>28.1%</b>
Chinese*	14,849	12.1%
Spanish	4,816	3.9%
Arabic	4,067	3.3%
Russian	2,461	2.0%
Italian	1,684	1.4%
Other LEP	6,612	5.4%

PUMA 4014: Brooklyn Community District 12-- Borough Park, Kensington & Ocean Parkway		
	Total	Percent
<b>Total</b>	<b>146,776</b>	<b>100.0%</b>
English Only	44,841	30.6%
Language other than English	101,935	69.4%
<b>LEP</b>	<b>50,323</b>	<b>34.3%</b>
Yiddish	11,446	7.8%
Spanish	9,896	6.7%
Chinese*	8,913	6.1%
Russian	6,337	4.3%
Bengali	3,797	2.6%
Other LEP	9,934	6.8%

PUMA 4015: Brooklyn Community District 14--Flatbush & Midwood		
	Total	Percent
<b>Total</b>	<b>146,214</b>	<b>100.0%</b>
English Only	73,993	50.6%
Language other than English	72,221	49.4%
<b>LEP</b>	<b>41,862</b>	<b>28.6%</b>
Spanish	10,752	7.4%
Russian	9,401	6.4%
French Creole	6,405	4.4%
Urdu	2,676	1.8%
Chinese*	1,872	1.3%
Other LEP	10,754	7.4%

PUMA 4016: Brooklyn Community District 15-- Sheepshead Bay, Gerritsen Beach & Homecrest		
	Total	Percent
<b>Total</b>	<b>138,284</b>	<b>100.0%</b>
English Only	59,568	43.1%
Language other than English	78,716	56.9%
<b>LEP</b>	<b>43,800</b>	<b>31.7%</b>
Russian	20,679	15.0%
Chinese*	8,908	6.4%
Spanish	3,227	2.3%
Arabic	1,667	1.2%
Turkish	1,058	0.8%
Other LEP	8,261	6.0%

PUMA 4017: Brooklyn Community District 11-- Bensonhurst & Bath Beach		
	Total	Percent
<b>Total</b>	<b>173,784</b>	<b>100.0%</b>
English Only	47,023	27.1%
Language other than English	126,761	72.9%
<b>LEP</b>	<b>83,626</b>	<b>48.1%</b>
Chinese*	38,128	21.9%
Russian	15,739	9.1%
Spanish	11,701	6.7%
Italian	5,077	2.9%
Arabic	2,533	1.5%
Other LEP	10,448	6.0%

PUMA 4018: Brooklyn Community District 13-- Brighton Beach & Coney Island		
	Total	Percent
<b>Total</b>	<b>100,450</b>	<b>100.0%</b>
English Only	30,745	30.6%
Language other than English	69,705	69.4%
<b>LEP</b>	<b>46,943</b>	<b>46.7%</b>
Russian	26,977	26.9%
Chinese*	6,370	6.3%
Spanish	6,218	6.2%
Urdu	1,106	1.1%
Italian	899	0.9%
Other LEP	5,373	5.3%

\* Includes Chinese, Cantonese, Mandarin, and Formosan



Top Languages by New York City, Borough, PUMAs/Community Districts: Queens  
 Universe: Population 5 years and over  
 2010-2014 American Community Survey Public Use Microdata 5-Year Sample

PUMA 4101: Queens Community District 1--Astoria & Long Island City		
	Total	Percent
<b>Total</b>	<b>164,639</b>	<b>100.0%</b>
English Only	67,230	40.8%
Language other than English	97,409	59.2%
<b>LEP</b>	<b>42,188</b>	<b>25.6%</b>
Spanish	19,472	11.8%
Greek	3,998	2.4%
Bengali	2,628	1.6%
Chinese*	2,278	1.4%
Korean	1,565	1.0%
Other LEP	12,247	7.4%

PUMA 4102: Queens Community District 3--Jackson Heights & North Corona		
	Total	Percent
<b>Total</b>	<b>168,613</b>	<b>100.0%</b>
English Only	26,740	15.9%
Language other than English	141,873	84.1%
<b>LEP</b>	<b>80,837</b>	<b>47.9%</b>
Spanish	63,419	37.6%
Chinese*	5,031	3.0%
Bengali	3,303	2.0%
Urdu	1,001	0.6%
Punjabi	851	0.5%
Other LEP	7,232	4.3%

PUMA 4103: Queens Community District 7--Flushing, Murray Hill & Whitestone		
	Total	Percent
<b>Total</b>	<b>237,331</b>	<b>100.0%</b>
English Only	66,046	27.8%
Language other than English	171,285	72.2%
<b>LEP</b>	<b>110,670</b>	<b>46.6%</b>
Chinese*	61,417	25.9%
Spanish	18,525	7.8%
Korean	15,128	6.4%
Italian	2,480	1.0%
Greek	1,825	0.8%
Other LEP	11,295	4.8%

PUMA 4104: Queens Community District 11--Bayside, Douglaston & Little Neck		
	Total	Percent
<b>Total</b>	<b>114,406</b>	<b>100.0%</b>
English Only	45,756	40.0%
Language other than English	68,650	60.0%
<b>LEP</b>	<b>34,105</b>	<b>29.8%</b>
Chinese*	14,560	12.7%
Korean	9,370	8.2%
Spanish	3,696	3.2%
Greek	2,007	1.8%
Italian	844	0.7%
Other LEP	3,628	3.2%

PUMA 4105: Queens Community District 13--Queens Village, Cambria Heights & Rosedale		
	Total	Percent
<b>Total</b>	<b>189,273</b>	<b>100.0%</b>
English Only	125,743	66.4%
Language other than English	63,530	33.6%
<b>LEP</b>	<b>23,128</b>	<b>12.2%</b>
Spanish	6,688	3.5%
French Creole	4,631	2.4%
Punjabi	2,075	1.1%
Chinese*	1,220	0.6%
Bengali	1,007	0.5%
Other LEP	7,507	4.0%

PUMA 4106: Queens Community District 8--Briarwood, Fresh Meadows & Hillcrest		
	Total	Percent
<b>Total</b>	<b>145,275</b>	<b>100.0%</b>
English Only	56,729	39.0%
Language other than English	88,546	61.0%
<b>LEP</b>	<b>38,641</b>	<b>26.6%</b>
Chinese*	10,384	7.1%
Spanish	8,762	6.0%
Bengali	4,502	3.1%
Russian	3,120	2.1%
Urdu	2,016	1.4%
Other LEP	9,857	6.8%

PUMA 4107: Queens Community District 4--Elmhurst & South Corona		
	Total	Percent
<b>Total</b>	<b>134,413</b>	<b>100.0%</b>
English Only	20,612	15.3%
Language other than English	113,801	84.7%
<b>LEP</b>	<b>69,072</b>	<b>51.4%</b>
Spanish	39,009	29.0%
Chinese*	13,951	10.4%
Bengali	3,288	2.4%
Tagalog	2,536	1.9%
Korean	1,241	0.9%
Other LEP	9,047	6.7%

PUMA 4108: Queens Community District 6--Forest Hills & Rego Park		
	Total	Percent
<b>Total</b>	<b>104,913</b>	<b>100.0%</b>
English Only	39,461	37.6%
Language other than English	65,452	62.4%
<b>LEP</b>	<b>27,325</b>	<b>26.0%</b>
Russian	8,238	7.9%
Chinese*	7,023	6.7%
Spanish	4,671	4.5%
Hindi	880	0.8%
Japanese	560	0.5%
Other LEP	5,953	5.7%

PUMA 4109: Queens Community District 2--Sunnyside & Woodside		
	Total	Percent
<b>Total</b>	<b>128,949</b>	<b>100.0%</b>
English Only	34,352	26.6%
Language other than English	94,597	73.4%
<b>LEP</b>	<b>51,074</b>	<b>39.6%</b>
Spanish	22,300	17.3%
Chinese*	7,340	5.7%
Bengali	4,231	3.3%
Korean	2,916	2.3%
Nepali	1,620	1.3%
Other LEP	12,667	9.8%

PUMA 4110: Queens Community District 5--Ridgewood, Glendale & Middle Village		
	Total	Percent
<b>Total</b>	<b>157,704</b>	<b>100.0%</b>
English Only	75,867	48.1%
Language other than English	81,837	51.9%
<b>LEP</b>	<b>35,532</b>	<b>22.5%</b>
Spanish	15,741	10.0%
Polish	5,927	3.8%
Chinese*	3,638	2.3%
Italian	2,704	1.7%
Romanian	1,273	0.8%
Other LEP	6,249	4.0%

PUMA 4111: Queens Community District 9--Richmond Hill & Woodhaven		
	Total	Percent
<b>Total</b>	<b>138,302</b>	<b>100.0%</b>
English Only	55,603	40.2%
Language other than English	82,699	59.8%
<b>LEP</b>	<b>35,670</b>	<b>25.8%</b>
Spanish	19,350	14.0%
Punjabi	3,237	2.3%
Chinese*	3,048	2.2%
Bengali	2,952	2.1%
Russian	1,038	0.8%
Other LEP	6,045	4.4%

PUMA 4112: Queens Community District 12--Jamaica, Hollis & St. Albans		
	Total	Percent
<b>Total</b>	<b>221,173</b>	<b>100.0%</b>
English Only	157,780	71.3%
Language other than English	63,393	28.7%
<b>LEP</b>	<b>32,672</b>	<b>14.8%</b>
Spanish	18,485	8.4%
Bengali	5,570	2.5%
French Creole	3,139	1.4%
Chinese*	870	0.4%
French	770	0.3%
Other LEP	3,838	1.7%

PUMA 4113: Queens Community District 10--Howard Beach & Ozone Park		
	Total	Percent
<b>Total</b>	<b>126,772</b>	<b>100.0%</b>
English Only	83,381	65.8%
Language other than English	43,391	34.2%
<b>LEP</b>	<b>15,952</b>	<b>12.6%</b>
Spanish	8,835	7.0%
Bengali	1,251	1.0%
Italian	1,221	1.0%
Punjabi	1,141	0.9%
Chinese*	749	0.6%
Other LEP	2,755	2.2%

PUMA 4114: Queens Community District 14--Far Rockaway, Breezy Point & Broad Channel		
	Total	Percent
<b>Total</b>	<b>107,645</b>	<b>100.0%</b>
English Only	74,618	69.3%
Language other than English	33,027	30.7%
<b>LEP</b>	<b>14,976</b>	<b>13.9%</b>
Spanish	9,290	8.6%
Russian	1,756	1.6%
Polish	807	0.7%
Chinese*	647	0.6%
Amharic	389	0.4%
Other LEP	2,087	1.9%

\* Includes Chinese, Cantonese, Mandarin, and Formosan

**Top Languages by New York City, Borough, PUMAs/Community Districts: Staten Island**  
**Universe: Population 5 years and over**  
**2010-2014 American Community Survey Public Use Microdata 5-Year Sample**

<b>PUMA 3901: Staten Island Community District 3-- Tottenville, Great Kills &amp; Annadale</b>		
	<b>Total</b>	<b>Percent</b>
<b>Total</b>	<b>157,474</b>	<b>100.0%</b>
<b>English Only</b>	<b>121,295</b>	<b>77.0%</b>
<b>Language other than English</b>	<b>36,179</b>	<b>23.0%</b>
<b>LEP</b>	<b>11,802</b>	<b>7.5%</b>
Italian	2,605	1.7%
Russian	2,499	1.6%
Spanish	2,004	1.3%
Chinese*	1,390	0.9%
Arabic	866	0.5%
Other LEP	2,438	1.5%

<b>PUMA 3902: Staten Island Community District 2--New Springville &amp; South Beach</b>		
	<b>Total</b>	<b>Percent</b>
<b>Total</b>	<b>124,859</b>	<b>100.0%</b>
<b>English Only</b>	<b>79,344</b>	<b>63.5%</b>
<b>Language other than English</b>	<b>45,515</b>	<b>36.5%</b>
<b>LEP</b>	<b>17,238</b>	<b>13.8%</b>
Chinese*	3,378	2.7%
Spanish	3,084	2.5%
Russian	2,954	2.4%
Italian	1,141	0.9%
Albanian	1,002	0.8%
Other LEP	5,679	4.5%

<b>PUMA 3903: Staten Island Community District 1--Port Richmond, Stapleton &amp; Mariner's Harbor</b>		
	<b>Total</b>	<b>Percent</b>
<b>Total</b>	<b>161,182</b>	<b>100.0%</b>
<b>English Only</b>	<b>106,327</b>	<b>66.0%</b>
<b>Language other than English</b>	<b>54,855</b>	<b>34.0%</b>
<b>LEP</b>	<b>20,133</b>	<b>12.5%</b>
Spanish	12,029	7.5%
Chinese*	1,622	1.0%
Arabic	942	0.6%
Russian	766	0.5%
Albanian	629	0.4%
Other LEP	4,145	2.6%

\* Includes Chinese, Cantonese, Mandarin, and Formosan

Sources: U. S. Census Bureau, 2010-2014 American Community Survey Public Use Microdata 5-Year Sample  
Population Division – New York City Department of City Planning (March 2016)



# **Language Access Implementation Plan**

**New York City Department of Sanitation  
City of New York**

**June 2021**

**Debra Barreto, Deputy Director  
Bureau of Community Affairs**

**DSNY Liaison to Mayor's Office of Immigrant Affairs  
DSNY Language Access Coordinator**

<https://www1.nyc.gov/assets/dsny/site/language-access-plan>

**Edward Grayson – Commissioner**

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## II. Agency Mission & Background

### Mission of DSNY

As the world's largest sanitation department, the New York City Department of Sanitation (DSNY) is proud to keep our great city healthy, safe and clean. Every day, DSNY collects more than 10,500 tons of residential and institutional garbage and 1, 760 tons of recyclables and enforces the City's Administrative and Health Code related to Sanitation, clearing litter, snow and ice from 6, 300 miles of city streets. In addition, New York' Strongest removes debris from vacant lots and abandoned bikes and vehicles from city's streets. DSNY committed to sending zero waste to landfills by 2030 by efficiently managing solid waste and developing environmentally sound long-term planning for handling refuse, organic waste and recyclables. The Department operates 59 district garages and manages a fleet of 2,033 collection trucks and 450 mechanical brooms.

The DSNY's primary services are to provide communities with refuse and recycling collection, street cleaning and snow removal. While these City services do not fully depend upon consumer interaction with very limited face-to face interaction with the general public and LEP customers we remain 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) handles customer service requests and complaints citywide. LEP-related service requests or complaints triaged and handled with its available telephonic interpretation contact. As needed, the DSNY also communicates with New Yorkers through its outreach and educational programs. Our community engagement, outreach and educational efforts are specifically tailored, directed to the public in general as well as used to educate identified neighborhood groups that would benefit from language translation services.

## III. Agency Language Access Policy and Goals

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

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

- increase image-based messaging wherever possible to broaden LEP access to Agency communications;
- update the DSNY *Sanitation Material Request Form* to include additional language options;
- work to improve our language PDFs database to include all fliers and updated information;
- 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 Sanitation 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 campaign;
- Continue review of educational/informational material for plain language usage.

#### **IV. Agency Language Access Accomplishments and Progress on goals from Previous LAIP**

We are pleased to report that the DSNY achieved many milestones since the 2018 update. Since then we:

- advertised for the Carryout Bag Ban in multiple ethnic newspapers reaching 840,000 customers;
- offered trainings in English, Russian, Spanish and Ukrainian for schools, apartment building staff and businesses;
- provided new direct links to the translated Compost Tips Sheets on the Make Compost section of MCNT: [makecompost.nyc](http://makecompost.nyc);
- continued to translate materials with Ericksen Translations;
- provided 8 new staff with access to Voiance telephonic interpretation services;
- provided refresher telephonic interpretation services training to staff teleworking due to COVID; the Voiance telephonic interpretation services were particularly helpful for DSNY's work and commitment to GetFoodNYC;
- incorporated image-based where possible making it easier for LEP customers to understand DSNY messaging;
- Contract renewal conversations are underway with the procurement team for both translation and interpretation services.

<b>Previous Language Access Goal</b>	<b>Update</b>
Expand language services via vendor contracts	Voiance telephonic contract secured; Expanded working relationship with Eriksen Translations, Inc. 30+ new documents translated Over 120 DSNY material are available in various languages
PDF Database	Work to improve our language PDFs database to include all fliers and updated information
	continued

Training	Voiance telephonic services: retraining as needed  New staff: trained in plain language and informed of the protocol/process regarding translating material
Improving ability to track LA requests	Ongoing
Participation in language-based outreach events	Community engagement staff participated in 17 language-specific outreach events in 2019 (N/A in 2020 due to COVID pause)

## V. Limited English Proficiency Population 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, 49% of New Yorkers above the age of five, or approximately 3.9 million New Yorkers, speak a language other than English at home. Twenty three percent of New Yorkers, or 2 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 based on data from the Census and the NYC Department of Education. Based on this analysis, the ten citywide languages for FY18 - FY21 are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish.

The Department of Sanitation 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. Since the DSNY provides public services which do not require direct contact with the public – the nature of our operations is not client driven - our direct contact with the public in comparison to the types of services provided is minimal. On a case-by-case basis, we review current neighborhood language-access needs.

2. Frequency of LEP persons come contact with services: As mentioned previously, the Department of Sanitation’s interaction with the LEP population is quite limited primarily due to the nature of its delivery of city services. Nonetheless, we do 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 in our Customer Service Unit where escalated issues are referred from 311. Although most information may be neighborhood specific, commonly used information is then made available in the top ten citywide languages as determined by the Mayor’s office of Immigrant Affairs. Besides those LEP customers assisted via telephonic interpretation contract, we currently we have a total of 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: While the Department of Sanitation understands the importance and benefits of communicating with LEP clients in their native languages, the nature of our business does not lend itself to direct interaction with the public. We do however, provide language appropriate translated material or bilingual staff as part of our regular community engagement and outreach practices. Our non-client based business is to keep our City healthy, safe and clean by collecting more than 10,500 tons of residential and institutional garbage and 1, 760 tons of recyclables and enforces the City’s Administrative and Health Code related to Sanitation, clearing litter, snow and ice from 6, 300 miles of city streets.
  
4. Resources available and costs to recipient: Because our limited direct interaction with the public, the NYC Customer Service Center at 311 is our primary source for review and referring public requests for services and/or information. As such the DSNY’s history with LEP-related service requests remains minimal. On those rare occasions when LEP clients submit service requests by contacting 311, Community Affairs staff triage the request and contacts 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.

<b>Service/Vendor</b>	<b>Instances</b>	<b>Languages Represented</b>	<b>Total Cost</b>
Voiance (telephonic)	1779 calls*	32	\$9396.06*
Eriksen Translations, Inc.		12 (10+Urdu/Yiddish)	\$11,024.20
	Audience		
Media Outlets Bangla Patrika Korea Central Daily News Allewaa Alarabi China Press Chinese World Journal India Abroad Binah Greek National Herald Haiti Liberte Japanese Weekly Biz Nowy Dziennik	844,000+	14	\$35,522.83



Russkaya Reklama			
Impacto			
La Voz Hispana			
Pakistan News			
Jewish Press			
<b>Total Costs</b>			<b>\$46,683.94</b>

**\* Includes GetFoodNYC calls**

During COVID, the DSNY was tasked to oversee and manage the Mayor’s GetFoodNYC Program. The 1779 Voiance calls included calls regarding the program.

The Department of Sanitation is committed to communicating with the LEP community in the languages that they understand in order provide them with easy access to DSNY’s service-related information. As such we continue to seek ways reach out to make this possible.

## VI. Provision of Language Access Services

Telephonic and Interpretation Services: The DSNY contracts Ericksen Translations and Voiance for language access services. Joan Byrnes, Senior Manager, Zero Waste Communications from our Bureau of Recycling and Sustainability oversees the contracts and LAP service requests.

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.

The Bureau of Community Affairs and the Bureau of Recycling and Sustainability continue to work together to incorporate the availability of translated documents in periodic employee updates and training sessions attended by both existing and new managerial/supervisory personnel. Department of Sanitation officials are updated on the new information from MOIA, availability of translated documents and staff training as warranted.

Language Access in Agency Communications: The DSNY conducts community engagement and outreach efforts to elected officials, community boards, ethnic service organizations and ethnic/foreign language media. Bilingual staff attends meetings (primarily by invitation) and is able to communicate with the public in several languages based on community needs. The Department also provides LEP clients with free information on our website regarding general sanitation issues; materials are available for download and translation.

Emergency Preparedness and Response: 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. 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 also made available via “mailers” and e-mail notices, media releases and/or media events. Our mailers indicate to readers and LEP clients where they may find access to more information in their language. Recent enhancements to the DSNY website are:

- the addition of a hero on our website’s home page with multiple languages directing customers to COVID-19 service advisories, and

- increased use of image-based messaging.

The DSNY continues to work very closely with its counterparts at the New York City Customer Service Center (3-1-1) to provide comprehensive information on Sanitation 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 the Department’s “hot-line information center”; 311 and assumed this responsibility for what was then the Sanitation Action Center. The 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 are able to provide Language Access Services to Limited English Proficiency customers as warranted.

To assist LEP customers, (there are no “in-person/walk-in” facilities open to the public operated by DSNY) the Department provides the appropriate signage at our household special waste sites and at the several SAFE disposal events held during the year to assist residents to rid themselves of harmful household products. Due to COVID and budget restrictions, there were no SAFE disposal events in 2020 and the Special Waste Sites were closed for most of the year. Nevertheless, when operational, the use of image-based messaging is used to help LEP participants navigate the sites and events. DSNY staff also maintains consistent contact with the public through regular attendance at meetings with block associations, precinct community councils, school groups, civic associations as well as ethnic service groups.

Plain Language: 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. In 2019 we trained an additional new staff member in plain language as part of their on-boarding process. DSNY staff trained in plain language continue to review written 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.

Policies and Procedures: We are looking into redeveloping our language access policies and procedures within DSNY. As we establish more experience in newer methods of communications (social media/website), we’ll be revisiting those needs to re-establish and improve on language services protocol as may be warranted.

Our ongoing outreach efforts and community feedback also enable the agency to keep current with communications and messaging to LEP customers. Commonly distributed pieces will be any paper pieces distributed citywide or over 75,000 per year, that are not predominantly images. This includes the How to Recycle and Trash Only Flyers, Organics Collection Brochure and Commercial Mailers and more. In an effort to reduce the rising costs of printing, and in particular, for documents which require updates/revisions as new mandates/laws/codes are implemented, our website links lead to an online order form at [nyc.gov/recyclingmaterials](http://nyc.gov/recyclingmaterials) directing LEP clients to PDFs of translated English print pieces in multiple languages; another site, [makecompost.nyc.gov](http://makecompost.nyc.gov), manages and houses the translated materials related to composting.

Vendor-based telephonic interpretation and translation services (Voiance and Ericksen Translations, Inc.) have also proven to be a great resource for providing LEP customers referred to DSNY with service-related information.

Notification of Free Interpretation Signage: As stated earlier, the DSNY does not operate/staff “in-person/walk-in” centers so we do not have interpretation signage as may be the case with other City agencies. 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.

Language Beyond the Top 10: As staff prepares for events throughout the city, they take into consideration the neighborhood(s) that we will be visible in and commonly used information is then 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.

## **VII. Training**

Our Language Access Liaison, Debra Barreto and any other “topic” appropriate staff – regularly attend MOIA led workshops and refresher training sessions on a variety of regarding a 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 enhancing the LEP experience, just to name a few.

We also update DSNY Department 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 attended by both existing and new managerial/supervisory personnel, provide awareness and reminders of new practices and language-related resources available to the public and more importantly, ongoing focus on plain language for consideration when developing agency messaging and during their own communications with LEP clients.

## **VIII. Record Keeping & Evaluation**

DSNY’s Bureau of Community Affairs which serves as the agency’s liaison to the Mayor’s Office of Immigrant Affairs periodically review 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. We continue to work closely with Eriksen Translations, Inc. resulting in improved communications with the vendor regarding the translation process. 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 revisit current practices to find ways to improve how we capture LEP-related services and information.

## **IX. Resource Analysis & Planning**

The Agency is currently working to renew our contract with Voiance 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. The Department 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 to direct them to available material in their primary language and wear badges identify them as being able to communicate in languages other than English, so that LEP individuals will know who can better serve them.

## **X. Outreach and Public Awareness of Language Access Services**

The Department of Sanitation’s Bureau of Community 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 Department 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.

As the Department’s Language ambassador, the Bureau of Community Affairs works with the Bureau of Recycling and Sustainability staff to:

- coordinate the provision of effective and timely interpretation service for written service requests, complaints, 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 Department’s website to ensure LEP clients have access to over agency’s information in 100 languages;
- continue developing agency website information options for LEP-related documents and information;
- work with community and ethnic media to disseminate critical information.

## **XI. Language Access Complaints**

Debra Barreto - Deputy Director – Bureau of Community Affairs and Language Access Coordinator, oversees language access complaints forwarded to DSNY. The Department rarely receives complaints submitted in languages other than English. We continue to experience that the NYC Customer Service Center (311) handles the majority of 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, Community 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 Community Affairs at: [customerservice@dny.nyc.gov](mailto:customerservice@dny.nyc.gov), or by calling our Customer Service Unit at (212) 291-1220.

## **XII. Implementation Plan Logistics**

Debra Barreto, Deputy Director of the Bureau of Community Affairs, is the Department’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. In the next fiscal year, language access line services will continue be available to staff; they will be provided with updates and reminders on the use of the language line services. 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 will have bilingual staff on hand and use of the language access line to assist LEP clients. The Department will also provide 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. The Department will revise its Language Access Plan at least every three years and will post it on the DSNY website: [nyc.gov/DSNY](http://nyc.gov/DSNY).

# **Language Access Implementation Plan**

**Department of Social Services/  
Human Resources Administration,  
Department of Homeless Services  
6/1/2021**



## Section 1: Agency Name and Language Access Coordinator

<b>Agency name</b>	Department of Social Services (DSS)/ Human Resources Administration(HRA), Department of Homeless Services (DHS)
<b>Name of the agency's Language Access Coordinator (LAC) and all office titles held by this individual.</b>	Marah Rhoades, Deputy Commissioner, Office of Advocacy and Outreach
<b>Where the information about the Agency's LAC is posted on the internet.</b>	DSS/HRA: Click <a href="#">here</a> or visit <a href="https://www1.nyc.gov/site/hra/help/immigrant-resources.page">https://www1.nyc.gov/site/hra/help/immigrant-resources.page</a>  DHS: Click <a href="#">here</a> or visit <a href="https://www1.nyc.gov/site/dhs/about/language-law-access-plan.page">https://www1.nyc.gov/site/dhs/about/language-law-access-plan.page</a>

## Section 2: Agency Mission and Background

**Describe your agency's mission and provide a comprehensive description of services offered and the ways in which the agency interacts with the public.**

In 2017, the administrative units of the NYC Human Resources Administration (HRA) and the NYC Department of Homeless Services (DHS) merged to create an integrated services model that provides more effective, seamless client services under the Department of Social Services (DSS). By working together under shared leadership and a unifying structure, we are doing more effective work for more New Yorkers in need. This includes sharing resources for providing free and confidential language services, managed by the DSS Office of Refugee and Immigrant Affairs (ORIA).

For specific questions on COVID-related policy and practice modifications, please see the Agency's webpages at [www.nyc.gov/hra](http://www.nyc.gov/hra) and [www.nyc.gov/dhs](http://www.nyc.gov/dhs).

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### Human Resources Administration (HRA)

Serving more than 3 million New Yorkers annually, the New York City Human Resources Administration (HRA) provides economic support and social services to families and individuals through the administration of major benefit programs including Cash Assistance, Supplemental Nutritional Assistance Program benefits (food stamps), Medicaid, and Child Support Services. HRA also provides homelessness prevention, educational, vocational and employment services, assistance for persons with disabilities, services for immigrants, MTA fare discounts, civil legal aid and disaster relief. For the most vulnerable, it provides HIV/AIDS Services, Adult Protective Services, Home Care and programs for survivors of domestic violence. HRA promotes equity for New Yorkers through its commitment to services that fight poverty and income inequality, prevent homelessness and promote employment. HRA increases economic security by facilitating access to benefits and to employment and educational programs.



**a. Programs and Services Offered**

Temporary Cash Assistance

Eligible families may receive federally funded cash assistance or state funded benefits at HRA Job Centers throughout the five boroughs. Parents who are not eligible for cash assistance services due to immigration status or other factors may apply and receive benefits on behalf of their children.

Supplemental Nutrition Assistance Program

The Supplemental Nutrition Assistance Program (SNAP), formerly known as food stamps, provides assistance to low-income New Yorkers to increase their ability to purchase food. The program provides benefits through an electronic benefits card that can be used like a debit card at participating grocery stores, supermarkets, most farmers' markets, and some Green Carts.

Parents who are not eligible for SNAP benefits may apply for and receive benefits on behalf on their children.

Emergency Food Assistance Program

This program supports more than 550 community kitchens and food pantries throughout the City. These are places where people can get a nutritious meal or a supply of foodstuffs at no cost, regardless of immigration status. For a list of programs, locations and times, please call 311.

Homelessness Prevention

The Homelessness Prevention Administration (HPA) works with the NYC Department of Homeless Services (DHS), the NYC Department of Housing Preservation and Development (HPD), the NYC Housing Authority (NYCHA) and many other organizations and City agencies to prevent homelessness and assist families and individuals in need of maintaining stable, affordable housing in their communities.

Health Insurance Coverage

HRA's Medical Assistance Program (MAP) offers free and low-cost health insurance for low-income New Yorkers. Under State guidelines, MAP determines eligibility based upon income and resource levels for each of the health insurance programs that they administer.

Individuals and families can qualify for public health insurance even if they have income, own a house, own a car, have a bank account or receive private health insurance. Pregnant women and children may qualify for health insurance without regard to immigration status. All individuals, including those with no immigration status, can apply for emergency Medicaid for emergency, life-sustaining medical care.

#### Adult Protective Services

Adult Protective Services (APS) provides services and support for adults who are physically and/or mentally impaired who are at risk of harm. The program works to enable these individuals to live independently and safely within their homes and communities. Prospective clients may be referred by anyone. There is an APS office in each borough.

APS is available to persons 18 years of age and older without regard to income, who:

- Are mentally and/or physically impaired; **and**
- Due to these impairments, are unable to manage their own resources, carry out the activities of daily living, or protect themselves from abuse, neglect, exploitation or other hazardous situations without assistance from others; **and**
- Have no one available who is willing and able to assist them responsibly.

#### Home Care/Long-Term Care Services Program

The Home Care Services Program (HCSP) provides access to or authorizes services for a variety of Medicaid-funded long-term care services (LTC) designed to help eligible elderly persons or individuals with disabilities remain safely at home, rather than in a nursing home or other institution.

Long-term care services (LTC) refers to the wide range of in-home, community-based, and institutional services and programs that are designed to help elderly persons and individuals with disabilities of all ages. These services can be medical and non-medical and can help people with activities of daily living (ADLs) such as dressing, bathing and using the bathroom, and instrumental activities of daily living (IADLs) such as shopping, cleaning, laundry, and preparing meals.

Eligibility for Medicaid-funded home care programs varies among programs, but all programs require that the applicant be Medicaid-eligible.

### HIV/AIDS Services

The HIV/AIDS Services Administration's (HASA) mission is to expedite access to the essential benefits and social services, including case management, to eligible persons with AIDS or HIV and their families. Staff assists eligible clients in obtaining adequate housing, medical care and other services necessary to allow them to manage their lives with the highest level of self-reliance and dignity. Some HASA services are available without regard to immigration status.

### Domestic Violence Support Services

The Office of Domestic Violence (ODV) oversees the largest network of domestic violence services in the country. These state-mandated shelter and community-based programs provide prevention and intervention services, crisis counseling, advocacy and legal services to help families and individuals impacted by domestic violence. All programs are provided without regard to immigration status.

### Child Support Services

The Office of Child Support Services (OCSS) puts children first by helping parents provide for the economic and social well-being, health and stability of their children. OCSS serves custodial parents and guardians regardless of income and immigration status. Services include locating the noncustodial parent, establishing paternity, child support and medical support orders, and collecting and enforcing those orders. OCSS also assists noncustodial parents with modifying their child support orders, providing assistance in paying off child support arrears and providing employment assistance and referrals to services like mediation.

### Home Energy Assistance Program

The Home Energy Assistance Program (HEAP) helps low-income homeowners and renters pay regular and emergency heating costs, including heating fuel, equipment and repairs. HEAP may be able to help even if heat and utilities are included in the rent or the applicant lives in subsidized housing.

### Customized Assistance Services

Customized Assistance Services (CAS) helps HRA clients with health and/or mental health problems reach the highest attainable level of functioning and self-sufficiency by providing comprehensive, integrated, individualized clinical and support services.

CAS provides clinical expertise, recommendations, and direction to HRA in the fields of health, mental health, substance use and vocational rehabilitation. CAS staff provides psychiatric evaluation and crisis intervention services, housing eligibility services and assistance in obtaining federal disability benefits. CAS manages contracts that serve individuals and families with medical, mental health, and/or substance use disorders. CAS programs provide clinically focused case management and utilize sophisticated clinical tracking and reporting systems.

#### Office of Program Accountability

The integrity of HRA programs is maintained by the Office of Program Accountability (OPA). OPA confirms eligibility for first time applicants and active public assistance clients, conducts investigations of individuals and organized groups, and deters public benefits fraud.

#### IDNYC

HRA, in partnership with the Mayor's Office of Immigrant Affairs (MOIA) and the Mayor's Office of Operations, administers the IDNYC program. For details on the language access services provided by IDNYC, please see IDNYC's [Language and Disability Access Plan](#).

#### Fair Fares

Fair Fares NYC helps low-income New Yorkers with their transportation costs. With the Fair Fares NYC discount, participating New York City residents can receive a 50% discount on either subway or eligible bus fares or Access-A-Ride. Fair Fares NYC applications are open to eligible New Yorkers at or below the Federal Poverty Level. Subway and eligible bus discounts are open to New Yorkers who don't have (and aren't eligible for) discounted transportation from the MTA or the City.

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#### Department of Homeless Services

Together with our not-for-profit partners, the mission of the Department of Homeless Services (DHS) is to prevent homelessness when possible, address street homelessness, provide safe temporary shelter, and connect New Yorkers experiencing homelessness to suitable housing. We do this with accountability, empathy, and equity.

The Department of Homeless Services includes separate programs for different communities: Families with Children, Adult Families, Single Adults and Street Homeless Solutions.

DHS is the largest organization in the United States committed to preventing and addressing homelessness in New York City. As it engages in this mission, DHS employs a variety of innovative strategies to help families and individuals successfully exit shelter and return to self-sufficiency as quickly as possible.

Collaborating with other public agencies and nonprofit partners, DHS works to prevent homelessness before it occurs, reduce street homelessness, and assist New Yorkers in transitioning from shelter into permanent housing. Furthermore, DHS remains committed to meeting its legal mandate to provide temporary emergency shelter to those experiencing homelessness in a safe and respectful environment. DHS helps shelter clients to gain employment, connect to work supports and other public benefits, save their income, and search for housing, to better prepare for independent living.

Employment-focused programs and prevention services are the cornerstones of our work at DHS. Through this approach, we focus on the following critical objectives:

- To increase the number of households prevented from becoming homeless
- To reduce the number of individuals living on city streets
- To ensure the availability of temporary, emergency shelter for individuals and families with no other housing options available to them
- To increase client engagement and responsibility in moving to permanent housing
- To maintain shelter safety and sanitation
- To reduce clients' length of stay in shelter
- To ensure that those who exit shelter remain stably housed in the community

## Section 3: Agency language access policy and goals

**Describe your agency's language access policies and the overall goals of the agency's language access implementation plan.**

In our city of immigrants, DSS/HRA/DHS is committed to providing equal access for all New Yorkers. Thirtypercent of HRA's clients and nine percent of DHS's clients are limited English proficient (LEP). Collectively,our clients<sup>1</sup> speak more than 100 languages.

The overall goal of the DSS/HRA/DHS Language Access Implementation Plan is to ensure that all of the benefits and services that the Agency provides are equally accessible to all New York City residents, regardless of their language skill or preference.

The Agency's language access procedures and policies reflect our core principles:

1. All Agency employees are required to work with clients in the language of the client's preference. This is primarily accomplished through the use of bilingual staff and professional, contracted interpretation services.
2. All documents or notices that are produced by the Agency and seen by clients must be available in the following eleven languages in addition to English: Arabic, Bengali, Simplifiedand Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

DSS has an overarching policy on the provision of written translation services that covers all programs inDSS, HRA and DHS. According to the policy, all Agency-developed documents that are distributed to the public or shared with clients are to be available in 12 languages (Arabic, Bengali, Simplified and Traditional Chinese, English, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu).

To simplify the message to staff and accommodate the needs of HRA's and DHS's diverse program areas,each program has a policy on the use of interpretation services. In general, programs that offer benefits and services allow clients to provide their own interpretation services, if the suggested

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<sup>1</sup> Throughout this document, the word "client" is used to refer to clients, applicants, consumers or members of the public.

interpreter is over 18 years of age. Programs that conduct investigations generally do not allow clients to provide their own interpreters.

All program areas have policies on interpretation services include the following elements:

- No program/employee can discriminate, restrict or deny services or benefits based on a client's language or lack of English language proficiency.
- All employees are required to work with clients in the clients' preferred language.
- All limited English proficient (LEP) clients must be offered immediate, free and confidential language services.
  - o Language services can be provided by bilingual staff or by using professional interpretation services, including telephonic interpretation services.
- Individuals under the age of 18 are not allowed to provide interpretation services.
- All LEP clients have the right to confidential services. Staff may not ask other clients or members of the public to provide interpretation services.
- Staff can access telephonic interpretation services, in-person interpretation services and sign language interpretation services 24 hours a day/7 days a week.
- Staff may contact the Office of Refugee and Immigrant Affairs (ORIA) for additional support and guidance on any language access related issues.

The following are the Agency's specific language access goals for the period covered by this Language Access Implementation Plan (2021 – 2024).

**Goal #1: Increase number of translated documents available at DHS.**

Since the passage of LL30 in 2017, DHS has made an enormous commitment to providing translated documents in 12 languages<sup>2</sup>. More than 120 forms, including the Notice of Action which explains whether an individual/family has been accepted to shelter and what actions have been taken on their case, have been translated and are being provided to clients in 12 languages.

Pursuant to this plan, DHS is committed to having every Agency-generated form, even those not required by law, available in 12 languages.

<sup>2</sup> The Agency provides translations into the previously listed 11 languages. It is a total of 12 languages if English is also counted.

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**Goal #2: Improve telephone access to DSS/HRA/DHS.**

The Interactive Voice Response (IVR) system currently used by Infoline, the Agency’s call center, is notable to provide interactive responses in 12 languages.<sup>3</sup>

By the end of 2021, the Agency is committed to having a new phone service system in place. This system will allow for automated interactions in 12 languages and will include static, instructional messages on how to access interpretation services in even more languages. The messages and languages will be editable, allowing the system flexibility to meet the changing language needs of New York City. If needed, the system will allow callers to access a call agent with less wait time.

**Goal #3: Improve DSS/HRA knowledge of community partner organizations.**

The community organizations with which DSS/HRA partners are invaluable to serving New York City’s diverse communities. The support of our partner organizations amplifies the messages and lends credibility when working with the most vulnerable New Yorkers.

In 2021, DSS/HRA plans to conduct a survey of our community partners, allowing us to gather more information about both the needs of the organizations themselves and the communities they serve. One goal of the survey will be to determine which linguistic groups are being served by the community organizations that DSS/HRA partners with, and which are not. In 2022, DSS/HRA will be researching additional possible community partnerships in order to ensure that we are sharing information with organizations that touch as many New York City residents as possible.

**Goal #4: Continue to provide LEP training. Expand training to DHS providers.<sup>4</sup>**

DSS/HRA/DHS strives to provide a full training on working with limited English proficient (LEP) clients to all front-line (client-serving and outreach) staff every year. The training is one and a half hours long and covers how to identify a client’s language of preference, how to access language services, and when to call ORIA for additional support. (For details on the training, see section 7.)

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<sup>3</sup> The current IVR system provides an interactive response in two languages and has limited menu options in four additional languages.

<sup>4</sup> For the purpose of this report, “providers” are contracted social service agencies who provide direct services to HRA or DHS clients on behalf of DSS/HRA/DHS. This is distinct from the term “vendors,” which, in this report, refers to companies that provide language services, such as interpretation or translation services.



DSS/DHS recognizes the value of this training and the information that it contains. By 2022, we will be sharing this training with DHS shelter providers as well as Agency staff, ensuring that all of our clients receive the best language services, whether they are working directly with us or with our partners.

**Goal #5: Continue to share our services with a larger number of providers.**

Although Local Law 73 requires that all Agency providers offer a full suite of language services, DSS/HRA/DHS acknowledges that this is a heavy burden. Small providers, who have a limited need for interpretation services will pay the highest rate per instance. In order to take advantage of the Agency's larger purchasing power, the Agency has opted to share our telephonic interpretation and sign language interpretation services with many of our service providers. A more limited number of providers have access to our on-site interpretation services contract.

The Agency's service sharing agreement has been slowly expanding since 2017. ORIA continues to carefully monitor usage, access and expenses. Thus far, the costs have been limited. Because of this success, the Agency will continue to expand this service to additional providers, making sure that all of our clients are receiving the best quality language services.

**Goal #6: Use selective certification to increase the number of bilingual staff working with clients.**

At DSS/HRA/DHS, we recognize that our most important resource is our staff. Having bilingual staff who can work directly with clients in their shared language increases client confidence, reduces errors and increases efficiency. The Agency is committed to, within the confines of the Agency and City budgets, increase the percentage of our staff that are bilingual by using the NYC Department of Citywide Administrative Service (DCAS) selective certification process. Our ultimate goal, is to have the staff in each of our local centers mirror the community that they serve.

## Section 4: Language Access Accomplishments and Progress on Goals from Previous LAIP

Identify your agency's language access accomplishments since the passage of LL30 in 2017. Provide an update on goals listed in the Agency's previous LAIP.

DSS is proud to be one of the largest providers of interpretation and translation services in New York City government. From 2018 to 2020, DSS/HRA/DHS has:

- Provided 952,236 instances of telephonic interpretation services. In 2019, staff made more than 30,000 calls per month, or about 1,400 calls per work day.<sup>5</sup> Interpretation services were provided in 110 languages.
- Provided 6,808 instances of on-site interpretation services,<sup>6</sup> including providing interpretation services in 11 languages for in-person and virtual public hearings. In 2019, the Agency provided on-site interpretation services 2,967 times.<sup>7</sup>
  - In 2019, the Agency contracted with a second on-site interpretation services vendor to ensure that services can be provided for speakers of languages that are less frequently spoken in New York City.
- Provided 1,958 instances of sign language interpretation services. The usage of sign language interpretation services has increased 50% since the provision of these services transitioned to the language services team in the Office of Refugee and Immigrant Affairs (ORIA) in 2016.
  - In collaboration with the Mayor's Office for People with Disabilities, Infoline hired a staff member who signs to communicate directly with the deaf and hard-of-hearing community via a video phone. As of March 2021, the Agency has received 1,257 video phone calls from clients who are deaf or hard-of-hearing.

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<sup>5</sup> Use of telephonic interpretation services went down in 2020 due to COVID-related service model changes. As a result of federal waivers, many clients were able to receive benefits without an interview. Other clients were able to maintain ongoing benefits without renewals. As a result, the number of individuals who spoke to an Agency staff member likely dropped, even as the number of clients receiving Agency benefits increased.

<sup>6</sup> Spoken languages only. This number does not include sign language interpretation services.

<sup>7</sup> Use of on-site interpretation services dropped in 2020 due to the COVID-19 pandemic. The Agency used remote services instead of on-site services when it was safe to do so in order to minimize staff and client exposure.

- ORIA and the Office of Disability Affairs worked with the deaf and hard-of-hearing community to develop a tool, called the ASL Options Card, that allows staff to ask clients who use sign language whether they would prefer video or in-person interpretation services.
- Processed 979 requests for translation<sup>8</sup>, including both Agency-generated documents and client-provided documents used to establish program eligibility. As of 2019, all public- or client-facing documents generated by HRA and most DHS manually-generated notices are available in 12 languages.
  - The Agency has contracted with a second vendor to provide a quality assurance review of any documents and ensure that the primary vendor is remaining faithful to our agreed upon translation database of terms. Documents are submitted for secondary review at ORIA's discretion or at the request of staff.
- In 2018, the Agency began to allow some providers access to our telephonic interpretation and sign language interpretation contracts. This successful initiative continues to expand. As of February 2020, 139 providers have access to the Agency's contracts for telephonic interpretation services, sign language interpretation services or both.
- Provided dedicated multi-lingual web pages that were professionally translated in 11 languages on our websites, [nyc.gov/hra](http://nyc.gov/hra) and [nyc.gov/dhs](http://nyc.gov/dhs). The multi-lingual web pages contain a summary of all of the programs that the Agency provides, as well as a link to critical forms and information, in the same language, for each program area. This is in addition to a Google translate option that allow for a machine translation of the website in a greater number of languages.
  - The professionally translated, multi-lingual webpages includes the most recent notifications regarding COVID-related changes in Agency practice and policy in each of the 11 languages.

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<sup>8</sup> One request for translation may include more than one document/notice.

- Produced ACCESS HRA, a mobile responsive website and integrated mobile app, in the seven languages required by Local Law 73.<sup>9</sup> Using ACCESS HRA, individuals can apply for or recertify for SNAP benefits, upload documents, see their case status, available benefit amount and any upcoming appointments, update their information, and opt-in to the Fair Fares program. For additional information on ACCESS HRA, see Section 6, subsection 3.
- Provided 9,500 trainings on working with limited English proficient (LEP) clients.<sup>10</sup> The hour and a half classroom training includes how to identify a client’s preferred language, when and how to offer interpretation services, how to access translated documents and contact information for ORIA. (For details on the DSS/HRA/DHS language access training, see section 7.)

The following is an update on the goals listed in the DSS/HRA and DHS Language Access Implementation Plans of 2019.

Agency	Goal Identified in the Agency’s 2019 Language Access Implementation Plan	Status
HRA	Ensure DSS/HRA-created documents are translated in compliance with LL 30 and the Agency’s translation policy.	Completed
HRA	Ensure all application and recertification materials are LL30 compliant.	Completed
HRA	Expand the use of technology to provide high-quality client services, including: <ul style="list-style-type: none"> <li>▪ Adding additional languages to self-service kiosks</li> <li>▪ Adding additional languages to tickets</li> <li>▪ Increasing tablets available for video interpretation</li> <li>▪ Providing additional online translations</li> <li>▪ Expanding video sign language services</li> </ul>	Completed

<sup>9</sup> French is provided as a substitute for Haitian Creole in the mobile version of the application because neither Android nor iPhone support Haitian Creole.

<sup>10</sup> Number of trainings, not staff who have been trained. Staff may have received the training more than once.

HRA	Maintain compliance with local law by providing LEP training to all front-line staff.	Completed
DHS	Ensure all client notices and documents are in compliance with the Agency's translation policy (available in 11 languages).	Substantively Completed. (For details, see Sect. 6, 1)
DHS	Use the power of shared DSS services to improve client service, including: <ul style="list-style-type: none"> <li>▪ Provide additional information on nyc.gov/dhs in all 11 citywide designated translation languages</li> <li>▪ Ensure that all application packets include a notice of free interpretation services</li> <li>▪ ☑ Combine 311 and Shelter Repair Hotline complaint tracking procedures</li> </ul>	Completed
DHS	Increase the use of newly available communications tools, including: <ul style="list-style-type: none"> <li>• Increase the use of on-site interpretation services</li> <li>• ☑ Increase the use of video to provide sign language interpretation</li> </ul>	Completed
DHS	Ensure the continuity of services over multiple platforms, including: <ul style="list-style-type: none"> <li>▪ Review the use of telephonic interpretation services by DHS shelter vendors</li> <li>▪ Make a determination on the best way to provide language services <ul style="list-style-type: none"> <li>○ to residents living in vendor-run shelters</li> </ul> </li> </ul>	Completed
DHS	Maintain compliance with Executive Order 120 by providing all front-line staff with LEP training.	Completed
DHS	Improve customer service by improving service tracking mechanisms, including: <ul style="list-style-type: none"> <li>▪ Correct CARES database to use distinct lists for spoken and written languages</li> <li>▪ ☑ Review language data available in CARES to ensure that volume of interpretation services provided is appropriate and proportional</li> </ul>	Completed

## Section 5: LEP Population Assessment

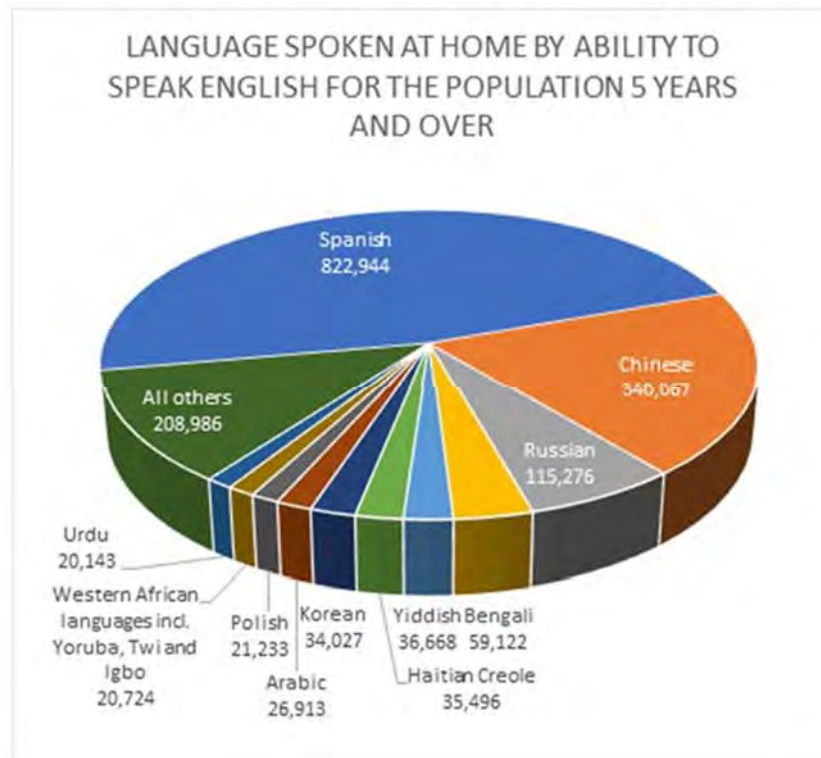
Apply the U.S. Department of Justice “four-factor analysis” to determine which LEP populations will be served and how. Based on the analysis, the agency must assess whether some or all of its direct public services should be provided in a language or languages supplemental to the designated citywide languages.

**Factor 1** examines the number or proportion of LEP persons eligible to be served or likely to be encountered by the program.

DSS/HRA/DHS’s service area includes all of New York City.

According to the U.S. Census Bureau<sup>11</sup>, New York City residents who speak English less than “very well” are most likely to speak: Spanish, Chinese, Russian, Bengali, Yiddish, Haitian Creole, Korean, Arabic, Polish, Western African languages, or Urdu (see Figure 1).

Figure 1



<sup>11</sup> U.S. Census Bureau, 2019 American Community Survey 1-Year Estimates

**Factor 2** is an analysis of the frequency with which LEP individuals come in contact with the program.

In 2020, HRA served 1.7 million unique cases. One-third (30%) of HRA's client population is limited English proficient. The top nine non-English languages spoken by HRA clients are: Spanish, Chinesedialects, including Mandarin, Cantonese and other, Russian, Bengali, Korean, Arabic, Haitian Creole,Urdu and Polish [see Figure 2].

In the same year, DHS served a total of 112,715 individuals or families. Of those, nine percent, or 10,369 individuals/families who lived in shelter in 2017, are limited English proficient (LEP). Collectively, DHS residents speak almost 30 languages. The top ten languages spoken by DHS residents, other than Englishare Spanish, French, Russian, Arabic, Mandarin, Haitian Creole, Hindi, Polish, Portuguese and Cantonese.

Figure 2

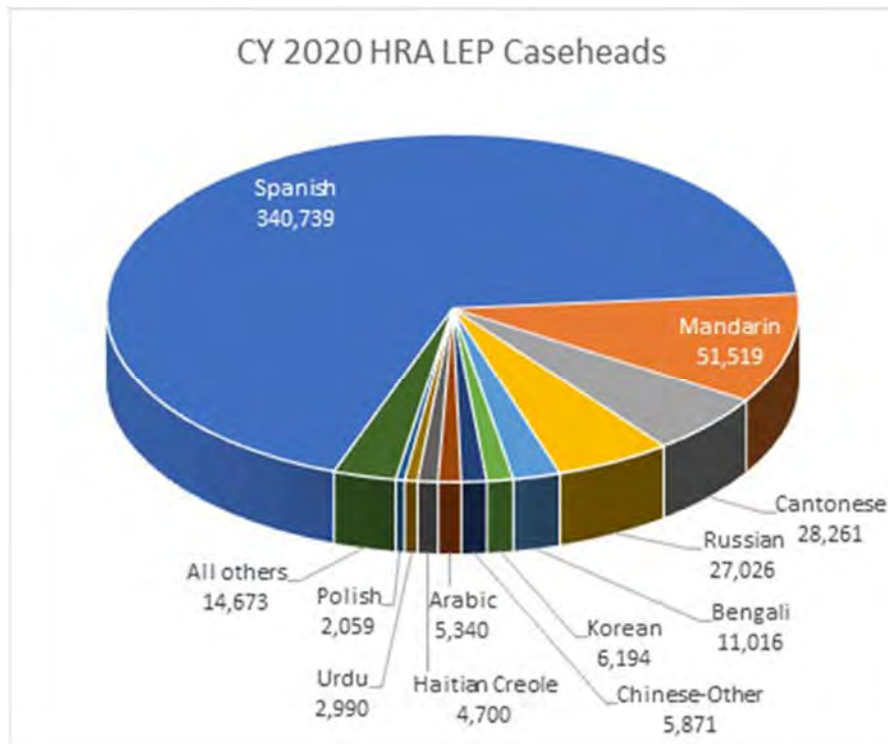
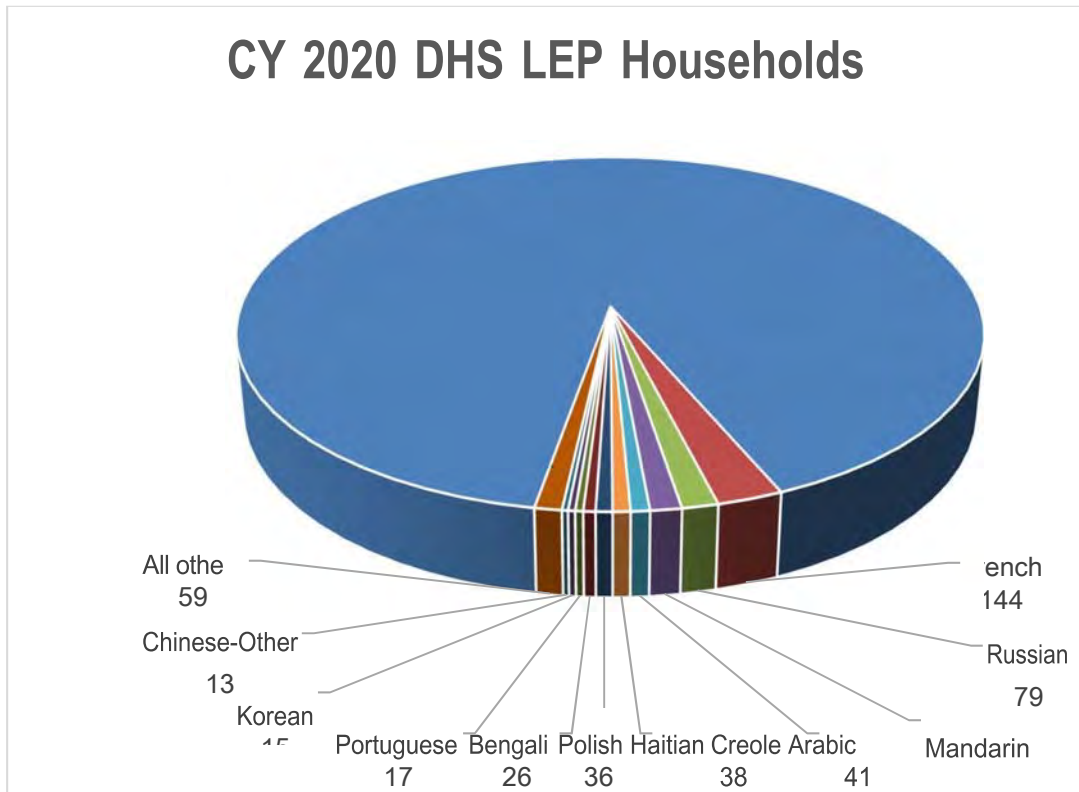


Figure 3



DSS/HRA/DHS primarily meets the needs of LEP clients through the use of bilingual staff, telephonic interpretation (available in more than 200 languages), on-site interpretation and video interpretation for spoken languages and sign language. With these tools, staff is expected to communicate with every client in their preferred language.

The Agency also provides written documents in all ten of the city-wide languages mandated by Local Law 30 (Arabic, Bengali, Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu). Together, these languages represent 99% of the Agency's LEP client population.

**Factor 3** requires an explanation of the nature and importance of the program, activity, or services provided by the program to people's lives.

DSS/HRA/DHS provides a variety of social services and economic assistance to eligible individuals and families. The goal of these services is to enable these New Yorkers to lead independent lives. When an applicant/client calls or visits any Agency office, language must not be a barrier to the receipt of



appropriate services. This plan reflects the Agency’s commitment to providing language access services and meeting the following over-arching goals:

- To ensure that language is not a barrier to Agency services;
- To ensure that all applicants, clients, and shelter seekers/residents have equal access to the services for which they are eligible, regardless of the level of their English proficiency;
- To inform all HRA applicants, clients, and shelter seekers/residents that free interpretation services are always available; and
- To train front-line staff on the importance of ensuring access to free interpretation services for all LEP clients.

**Factor 4** requires a description of the resources available to the Agency and costs.

DSS/HRA/DHS uses bilingual staff, telephonic interpretation and, when appropriate, video or on-site interpretation to speak with clients in their preferred language.

DSS/HRA/DHS utilizes outside vendors to provide written translation, on-site interpretation, telephonic interpretation, sign language interpretation and bilingual skills testing. We provide these services to our clients under the citywide language service contracts provided through the NYC Department of Citywide Administrative Services (DCAS).

Type of Service	Vendor	2019 Instances	2019 Expenditures
Telephonic Interpretation	Language Line Solutions, Inc.	366,288	\$2,606,630
Written Translation	Language Line Solutions, Inc.	1,479	\$1,104,440
Sign Language Interpretation (video and in-person)	Accurate Communication, Inc.	759	\$145,513
On-Site Interpretation (excluding sign language)	Geneva Worldwide, Inc.	2,967	\$139,313

Quality Assurance for Written Documents	Eriksen Translations, Inc.	7	\$6,609
On-Site Interpretation, Secondary Contract	Accurate Communication, Inc.	14	\$3,421
<b>Total Costs</b>			<b>\$4,005,584</b>

As described in more detail below, the Agency also conducts regular staff trainings, updates procedures to improve services to LEP clients, posts signage at all sites to notify clients of their right to free interpretation services, and utilizes a variety of language access tools to help workers and clients identify language needs.

**b. Language Access Needs of the Agency**

DSS/HRA/DHS fully understands that effective communication in any language is essential for clients in accessing our crucial services and programs. The Agency is firmly committed to ensuring that all New Yorkers, no matter what their language of preference, can apply for and access all of the Agency’s benefits and services. While serving more than 500,000 limited English proficient New Yorkers per year requires a significant commitment, it is a commitment that the Agency continues to make.

The Agency provides telephonic interpretation services in more than 200 languages, which covers more than 99% of Agency clients. Given that the ten citywide designated languages represent more than 99% of the Agency’s clients, we do not anticipate the need to increase our translation languages in the immediate future.

## Section 6: Provision of Language Services

**Outline how the agency provides language services for individuals with LEP across the multiple points of interaction with the public.**

### *1.- Subcategory: Translation*

**Identify the progress that the agency has made in translating its most commonly distributed documents into the 10 designated languages.**

DSS/HRA/DHS has made a commitment to providing written translations that goes beyond the requirements set forth in Local Law 30. Rather than translating “the most commonly distributed documents” into 10 languages, DSS/HRA/DHS is translating all client- or public-facing documents into 11 languages – Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu. These commitments are reflected in the DSS policy on the translation of written documents.

In 2018, DSS/HRA embarked on an ambitious project to ensure that all client- and public-facing documents met this translation standard. After ensuring that multiple client notification and data tracking systems were updated to allow for additional languages, HRA reviewed every notice. As of December 2019, virtually every HRA-generated notice or form currently in use is available in all 12 languages.

In 2019 and 2020, the Agency brought a similar focus to DHS-provided documents. In 2019, the DHS engaged in an extensive review of the available document production systems and coordinated a strategy for document delivery. In 2020, staff reviewed hundreds of documents for plain language and submitted them for professional translation. As of February 2021, there are more than 110 static DHS-generated documents that have been reviewed, approved and translated. These notices are now being regularly distributed to clients in 12 languages. These notices include documents about shelter rules, reasonable accommodations, consent forms and COVID-related information materials.

In addition to these static documents, DHS has taken advantage of the resources provided by DSS/HRA to build out a new system for providing personalized, translated materials to clients. As of February 2021, there are 12 such forms, including the Notice of Action Taken (commonly referred to as the

“4002”), health screenings, appointment notices and intake assessments. These forms, including snippets of client-specific information, are fully translated and being distributed in 12 languages.

DHS also has an additional three forms that are described and supported by an explanatory memo, available in 12 languages, that explains the purpose of the attached English language form, reiterates that the contents should have been explained using interpretation services and offers a full translation at a later date. These forms include the Independent Living Plan, psychosocial assessments and other forms that are very personalized for each client. Clients who read in languages other than English will get the English language form, along with the explanatory memo in their language of preference. DHS is also working on an initiative to enhance and streamline this process for these three personalized forms.

All of the documents described above, including static documents, translated forms and explanatory memos are also used by DHS service providers.

Between 2021 and 2024, DHS is committed to expanding the list of translated forms available to include all of the forms that clients receive, including those solely used by providers.

In addition to translating Agency-generated notices, DSS/HRA/DHS continues to provide clients with translations of their submitted documents when these documents are needed to prove eligibility for Agency programs. Most Agency benefits require proof of: identify, income, and residency. If the documents that a client presents for this purpose are in languages other than English, the Agency provides the translations for these documents, rather than requiring that clients assume the expense of providing their own translations.

All DSS/HRA/DHS translations are processed through the Agency’s Written Translation Coordinator, a full-time staff person based in ORIA. Translations are solely provided by Language Line Solutions.

In late 2019, DSS worked with Language Line to be able to provide a limited number of high-priority, limited format documents on an expedited (24 hour) basis. These documents include documents related to emergency actions and city-wide notifications.

In 2019, the Agency worked with two professional translation vendors to write and confirm a detailed translation glossary that includes commonly used social service terms, program details, unusual English-language expressions (i.e. “reasonable accommodation”) and LGBTQI terminology. Occasionally, at the discretion of ORIA or other Agency staff members, translations are reviewed for quality and adherence to our Agency translation glossary by Eriksen Translations. While bilingual staff may review documents

and suggest edits, all translations and final translation decisions are made by the professional translation staff at Language Line Solutions. (The exception to this rule is two professional Spanish language translators who are employed by the Office of Policy, Procedures and Training and who provide a limited number of quick turn-around Spanish translations.)

In 2020, DSS/HRA/DHS processed 979 requests for translations<sup>12</sup>. This includes newly created documents, revisions to previous documents, previously untranslated documents and client eligibility documents.

Staff are made aware of the availability of translations, how to access them, how to request additional translations and where to submit possible translation errors for review through the Agency's detailed training on working with LEP clients. (For additional details, please see Section 7).

## *2 - Subcategory: Interpretation Services*

**Identify the progress the agency has made providing telephonic and in-person interpretation services.**

DSS/HRA/DHS recognizes that our diverse staff are a critical resource. When staff are fluent in a language other than English, they are encouraged to work with clients in their own shared language, ensuring a deeper understanding and faster service.<sup>13</sup>

While our staff is diverse, they cannot meet the language needs of our linguistically diverse client-base at all times and so all DSS/HRA/DHS staff has access to telephonic interpretation services, 24 hours a day/7 days a week/365 days a year. Staff are instructed to use language services at all interactions with clients or members of the public, including in-person appointments, walk-in visits, home visits, phone calls and public presentations or meetings.

All DSS/HRA/DHS staff are provided with an information card with a designated telephone number for interpretation services and an access code. These cards are distributed to new staff and redistributed at language access trainings each year. (For details on LEP training, please see section 7.)

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<sup>12</sup> Each translation request could represent more than one document.

<sup>13</sup> For a full description of the Agency's language access policies, including policies on the use of bilingual staff, please see section 3.

## How To Call For An Interpreter

1. DIAL 1-855-
2. SAY THE LANGUAGE YOU NEED  
If you don't know the language, speak to a Customer Service Representative by dialing "0."
3. ENTER YOUR ACCESS CODE: \_\_\_\_\_

- Call for an interpreter before you make an outgoing call.
- Write down the name and ID number of the interpreter.
- Interpretation services are available 24/7/365 in over 200 languages.
- If you need help, contact your Language Liaison or the Office of Refugee and Immigrant Affairs (ORIA) at 212-331-4550.

Department of Social Services  
Human Resources Administration  
Department of Homeless Services
PALM-21 (E)  
06/18

The LEP training provided by ORIA to all HRA and DHS front-line staff includes a detailed description of how to determine a client’s language of preference. Staff are instructed to ask every individual what language they prefer to use and offer interpretation services. If the individual is not able to identify their language of preference in English, staff have a language card available for clients to point to. If the language is not included, if the interaction is occurring over the phone, or if the client does not point to a language, staff are instructed to use the resources of our telephonic interpretation services vendor.<sup>14</sup>



IF YOU DO NOT KNOW THE LANGUAGE OF THE PERSON WHO WANTS YOUR HELP, USE THIS CARD. THE PERSON CAN POINT TO THE LANGUAGE NEEDED AND YOU CAN ARRANGE FOR AN INTERPRETER.

English	"Do you speak...?"	"Please be seated. I will call an interpreter for you."	Español	¿Habla español?	Por favor, siéntese. Voy a llamar a un intérprete para usted.
Arabic	Fliaara angaq?	Uuni lu lutam. Po shiqiq la tharim qil pialitayag pil ju.	Italiano	Parla italiano?	Prego, si accomodi e attenda mentre Le chiamo un interprete.
Arabic	هل تتكلم اللغة العربية؟	الرجاء بالجلوس. سأقوم بإحضار مترجم لك.	Korean	어떤 언어를 말씀하십니까?	편의사항을 말씀해 주십시오. (편의사항을 알려주세요.)
English	How do you speak?	How do you speak? I will arrange for an interpreter for you.	Korean	한국어를 사용하십니까?	편의사항을 알려주세요. (편의사항을 알려주세요.)
Spanish	¿Habla español?	Molimo, siéntese. Pediré un intérprete para usted.	Polish	Czy Pan/Pani mówi po polsku?	Proszę si usiąść, poproszę przywołam tłumacza.

In 2019, DSS/HRA/DHS, provided 366,288 instances of telephonic interpretation services. This is an average of 1,400 calls per business day. In 2020, this number dropped to 279,430, a reflection of a series of pandemic-approved waivers from the federal government that meant that many New Yorkers could apply online and receive benefits without an interview and some did not need to recertify their benefits. Telephonic interpretation services continue to be available through our vendor, Language LineSolutions in 240 languages.

Under Local Law 73 (LL73), all DSS/HRA/DHS contracted providers are also required to provide telephonic interpretation services for clients. The Agency has recognized this as a burden on our

<sup>14</sup> Customer Service staff at Language Line Solutions use their knowledge of the most commonly requested languages, multi-lingual interpreters and trial and error to assist in determining a client’s language of preference.

providers and, as discussed earlier in this report, has opted to share our contracted language services with many of our vendors. As of 2021, there are 139 providers who access the Agency's telephonic interpretation services, sign language interpretation services or both. This program has proven to be a success and so the Agency will be expanding the offer to additional providers in the future.

In addition to providing telephonic interpretation services, staff have had access to in-person interpretation services. This service is primarily used by the Adult Protective Services and IDNYC programs, but can also be used by any program in order to support a client who, for any reason, is unable to use telephonic interpretation.

DSS/HRA/DHS also uses an in-person interpretation at all public hearings and community meetings to ensure these events are accessible to all attendees.<sup>15</sup> When needed, DSS/HRA/DHS can also provide booths and headsets for public events.

In 2018, ORIA determined that despite providing an impressive array of languages, our in-person interpretation vendor could not provide services in a few rare languages and did not have enough interpreters available in other languages. To address this, ORIA contracted with a second, in-person interpretation services vendor to close this service gap and ensure that all our clients receive the best possible service with the shortest possible wait time.

In total, DSS/HRA/DHS used in-person interpretation services 673 times in 2020.<sup>16</sup> This number is lower than the 2,967 times that this service was used in 2019 because in response to the COVID-19 pandemic, the Agency transitioned to remote services for the safety of staff and clients.

ORIA is responsible for monitoring the provision of all language services used by DSS/HRA/DHS staff members. Staff are instructed in the annual LEP training to contact ORIA if they require additional support overcoming any language barriers or service issues. The language services team reviews all

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<sup>15</sup> In-person interpretation at public hearings is provided in American Sign Language, Arabic, Bengali, Cantonese, French, Haitian Creole, Korean, Mandarin, Polish, Russian, Spanish and Urdu. If other languages are requested, the Agency will provide additional languages at the hearing.

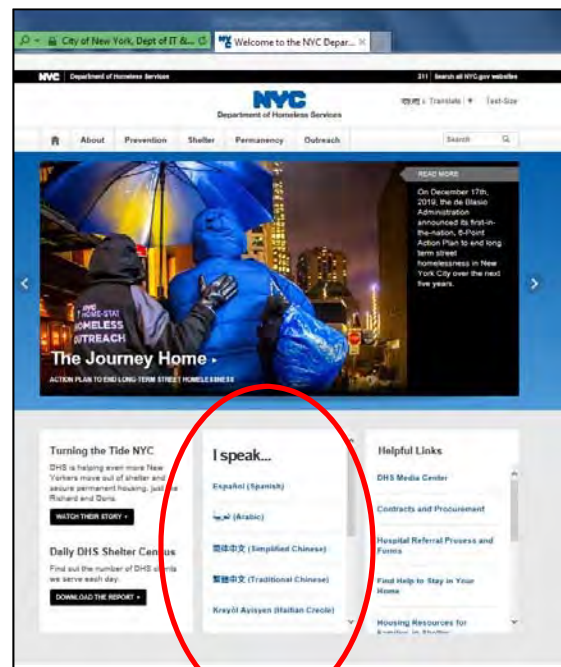
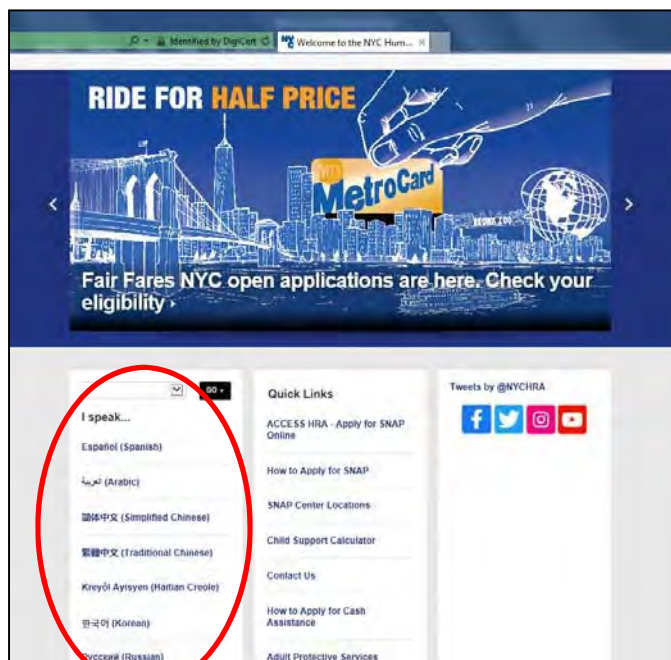
<sup>16</sup> This information, including the count of interpretation instances, only refers to spoken language interpretation. It does not include sign language interpretation services which are also available to all DSS/HRA/DHS clients.

language access complaints and works in tandem with the appropriate internal and external parties to resolve them. The team also tracks monthly usage in our invoices from vendors and works with program areas to address service gaps. ORIA also meets quarterly with program representatives to ensure language access mandates are incorporated in program operations.

### 3 - Subcategory: Multilingual Agency Communications

**Identify your agency’s progress toward making other types of agency communications accessible to individuals and/or communities with Limited English Proficiency (LEP). Other types may include emergency notifications, public hearings and events, press releases, website content, social media, and other communications to the public.**

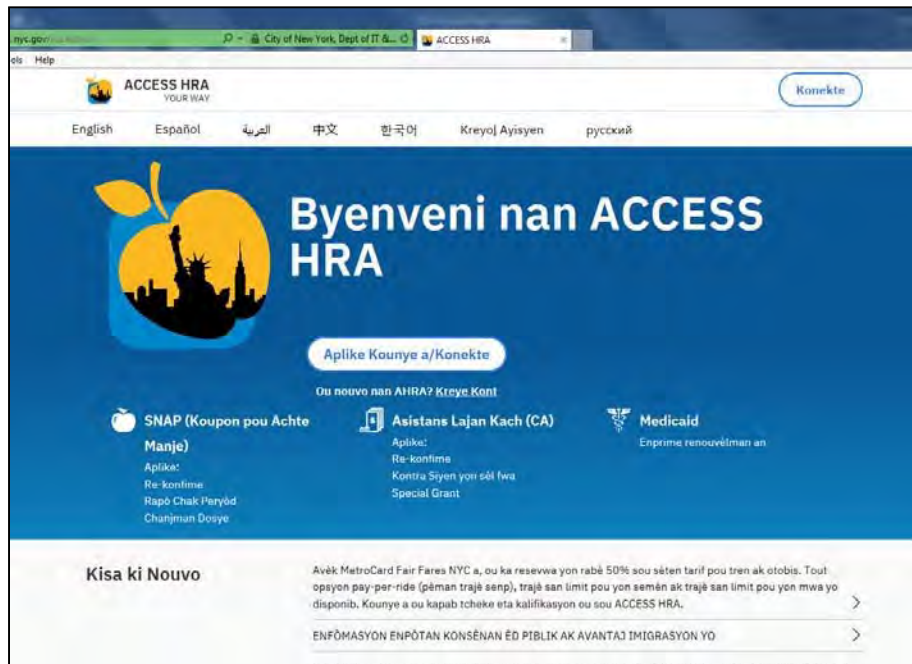
DSS/HRA/DHS are also committed to making information available to LEP clients via Agency websites and mobile applications. The HRA and DHS websites (nyc.gov/hra and nyc.gov/dhs) both include text, directly below the large banner at the top of the page, that indicates where readers of the 11 Agency- wide translation languages can click to get information in their language. Each language link navigates to a page, translated by a professional linguist, that summarizes the Agency’s programs and services and how to access those services. Links are available to access program applications, brochures and additional resources. Whenever possible, the links to these additional resources go directly to that resource in the appropriate language.





During the COVID-19 pandemic, all of the multi-lingual text on the Agency’s website has been regularly updated to include the most recent information on Agency procedural and policy changes. These updates included information on center closings, automatic benefits extensions, and interview waivers.

ACCESS HRA, a mobile responsive website and integrated mobile app, is available in Arabic, Traditional Chinese, Haitian Creole/French<sup>17</sup>, Korean, Russian and Spanish. Using ACCESS HRA, individuals can apply for or recertify for SNAP benefits, upload documents, see their case status, available benefit amount and any upcoming appointments, update their mailing address or contact information, and opt-in to the Fair Fares program – all in seven languages. DSS/HRA/DHS are exploring expansion into additional languages. Clients can also use ACCESS HRA to update their preferred language with the Agency, which will automatically update the language in which they are receiving notices.



DSS/HRA/DHS is committed to reaching as many New Yorkers as possible. One of the ways that the Agency does that is through paid advertising in stores and ethnic/community newspapers. For major

<sup>17</sup> The ACCESS HRA website is in Haitian Creole, not French. Due to the technological limitations of iPhone and Android technology, the ACCESS HRA mobile site is in French, but not Haitian Creole.

campaigns, it is Agency practice to purchase advertising in a diverse array of newspapers, including those published in the 11 city-wide translation languages and in all five boroughs.

The Agency also uses social media sites to distribute messages about our services and to emphasize the messages of City Hall and other agencies. The Agency uses social media in English, Spanish and Chinese. (All translations provided by professional translation vendors.)

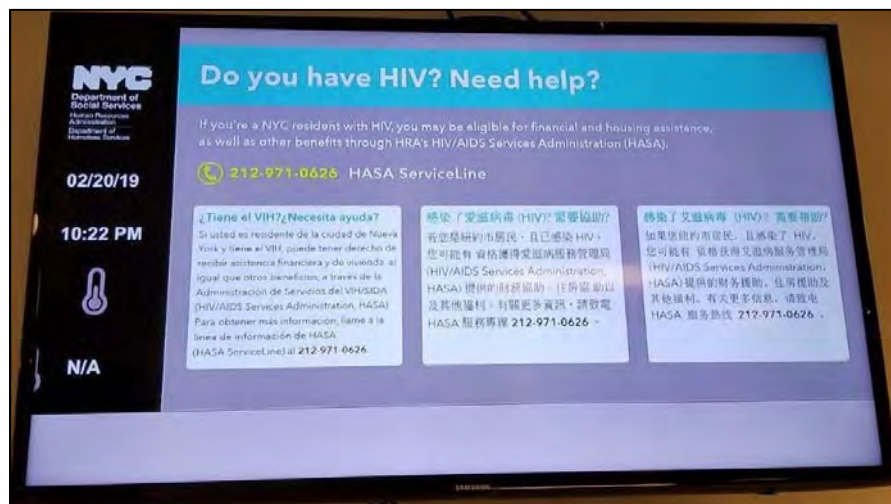
In every notice of a scheduled public hearing, DSS/HRA/DHS offers free interpretation services in any language. In addition to meeting any specific requests received, the Agency makes simultaneous interpretation of all in-person public hearings available in a minimum of 12 languages. (American Sign Language, Arabic, Bengali, Cantonese, French, Haitian Creole, Korean, Mandarin, Polish, Russian, Spanish, Urdu) During the COVID-19 pandemic, the Agency has transitioned to hosting virtual public hearings via Zoom. In this new environment, the Agency continues to offer free interpretation services in any language. Regardless of requests, virtual public hearings include interpretation, using Zoom in-meeting language features, in a minimum of three languages – American Sign Language, Mandarin and Spanish.

The DSS Office of Community Outreach and Engagement hosts and participates in a wide variety of outreach and enrollment events each year. Most events are scheduled by or planned in partnership with community partners. DSS Outreach also plans and sponsors its own benefits enrollment events, primarily in specific NYCHA communities that participate in the Mayor's Action Plan. The majority of the DSS's outreach staff are bilingual and interpretation services are always available. If a sponsoring community organization is not able to provide in-person interpretation services at a public presentation, those services can be requested through ORIA. At a tabling or enrollment event, staff will use telephonic interpretation services. At all in-person events, staff bring outreach materials in a wide-variety of languages and stress that language services are available in all Agency walk-in locations. During the COVID-19 pandemic, the DSS Outreach team has participated in a number of virtual events, including several hosted entirely in Spanish.

In 2021, the Office of Community Outreach will conduct a survey of its existing network of community partners to assess the full scope of services provided in languages other than English. The outcome of this survey will direct the DSS's outreach efforts in 2022 and beyond to ensure that partnerships

adequately reflect the linguistic diversity of our clients. Additionally, Community Outreach and Engagement shares information and resources with community-based providers and advocates during presentations, trainings, and communications about how to access services and materials at DSS/HRA/DHS for clients whose preferred language is not English.

In 2019, HRA began to pilot the use of video screens in client waiting areas. The primary purpose of these video screens is to display multi-lingual information about DSS/HRA. English language information is displayed on the initial program area message screen, followed by a rotation of each Agency- mandated language and relevant imagery. Once all 11 translations have been displayed, the entire screen shifts to the next slide.



#### 4 – Subcategory: Plain Language

**Identify the agency’s progress in ensuring that communications with the public are in plain language.**

Staff in the Office of Policy, Procedures and Training (OPPT) write, design, and produce all the Agency’s/client-facing documents. Public-facing documents, including brochures and signs, are produced by the Office of Communications and Marketing team.

For DSS/HRA/DHS, plain language requirements are written in two separate policies. An HRA specific policy from 2016 requires that all public- or client-facing documents be reviewed for plain language purposes. To the extent possible, all documents are at a sixth-grade reading level or lower and icons, images, and formatting are used to enhance clarity.

The second policy that requires plain language review is the Agency's written translation policy from 2017. That policy applies to DSS, HRA and DHS.

#### *5 - Subcategory: Policies and Procedures*

**What policies and procedures track how to identify and track an individual's language, how to utilize the appropriate resource to provide language services, how to request that material be translated.**

See Section 3 of this report for details on the Agency's policies and procedures on written translation, including what documents are translated and how translations are managed and produced. Section 3 also includes details on each program area's policies on interpretation services, including how staff identify a client's language need.

See section 7 for details on the Agency's language access training, including who is trained, how often training is conducted and what materials are covered.

#### *6 - Subcategory: Posting of multilingual signage about the availability of free interpretation services*

**Identify the progress the agency has made posting multilingual signage about free language services.**

A poster-sized notice informing clients of their right to free language services is hanging prominently in all DSS/HRA/DHS locations. The poster reads, in 20 languages<sup>18</sup>, *"You have the right to free interpreter services at this location. If you need an interpreter, please go to the reception desk and we will call someone to interpret for you. If you have a question, comment or complaint about translation or interpretation at this location, please speak to a worker or call 311. Filing a complaint will not affect your case."* The poster also includes the symbol for sign language interpretation. The Office of Communications and Marketing staff are responsible for regularly confirming that each location has this mandated sign in an appropriate location and replacing any copies that are damaged over time.

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<sup>18</sup> The languages on the poster are: English, Albanian, Arabic, Bengali, Simplified Chinese, Traditional Chinese, French, Greek, Haitian Creole, Hebrew, Hindi, Italian, Korean, Polish, Punjabi, Russian, Spanish, Urdu, Vietnamese and Yiddish. These languages include all 12 of the Agency-wide languages.



This notice has been hanging in HRA locations since 2015. DHS locations previously hung similar posters informing clients of their right to interpretation services, but those signs have been replaced with the above for consistency.

In addition to this notice of free interpretation services, all HRA and DHS locations welcome clients to locations with similar multi-lingual signs in prominent locations.



7 - Subcategory: Languages Beyond the Top 10

Identify how the agency ensures that individuals who speak languages beyond the top 10 are able to access services and communicate with the Agency.

At DSS/HRA/DHS, spoken communication is not limited to the ten languages of Local Law 30. The Agency ensures that everyone who comes into contact with our staff is able to communicate with us in

their language of preference. We meet this mandate through the use of bilingual staff and telephonic interpretation services. In 2020, we provided client services in more than 100 spoken languages.

In 2014 and 2015, HRA began to disaggregate whether clients preferred to read Simplified or Chinese characters - detailed data that is not collected by any other organization in New York City. While we determined that more clients read Traditional Chinese, enough of a minority of HRA's large Chinese-reading population read Simplified, that HRA made the unique decision to produce documents in both sets of characters.<sup>19</sup> As a result, all Agency documents are translated in eleven languages, rather than the LL30 mandated ten.

In 2021, DHS implemented a new protocol that moves the Agency further toward providing full translation services to all clients. Included in DHS's new explanatory memos that accompany the most personalized notices and forms is an offer to fully translate the notice. The personalized, fully-translated notice will be delivered to the client as soon as possible, usually within three business days.

For additional information on the Agency's LEP population, see Section 4. Based on our four-factor analysis, the Agency has determined that the ten languages currently required by LL 30 covers 99% of our clients and ensures that they are able to receive documents in their language of preference.

#### *8 - Subcategory: Emergency Preparedness and Language Access*

##### **Identify the agency's progress to ensure that language access services are provided during an emergency response.**

DSS Emergency Management, which supports both HRA and DHS, works closely with ORIA to ensure that all LEP clients are able to access services during an emergency. Together, these teams confirm that documents are translated, that appropriate multi-lingual signage and LEP identification tools are available at emergency sites, that interpreters can be contacted, and that staff are trained in the provision of language services.

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<sup>19</sup> Although Traditional readers are still a majority in 2020, the margin continues to decrease.

According to NYCEM’s Language Access Plan, if an emergency has the potential to affect 75 or more households, if a service center is activated or if language access needs exceed the responding agency’s ability to provide services, the Mayor’s Office of Immigrant Affairs (MOIA) convenes the Language Access Lead Team. The Lead Team consists of the primary agencies responsible for language access during emergencies, including DSS, and coordinates interagency efforts to address language access needs before, during and after an emergency.

The Lead Agency in an emergency is responsible for providing language services. DSS is the Lead Agency when disaster assistance service centers or family assistance centers are established in response to an emergency. In these instances, the DSS Emergency Management team and the language access team at ORIA coordinate interpretation services, in consultation with NYCEM and MOIA. Together, these groups provide support, including providing interpretation services, translated documents, signage and contract support to NYCEM and the incident-lead Agency.

DSS/HRA is in regular contact with MOIA and NYC Emergency Management regarding these obligations. The Agency has participated in table-top exercises, “hot washes” and planning exercises with NYCEM and other agencies to ensure that we are prepared to take on these responsibilities when needed.

DSS/HRA/DHS is not responsible for the city’s COVID response plan, but has created a vaccine pod to distribute vaccines to qualified DHS staff and clients.<sup>20</sup> On-site interpretation services in Spanish are being provided at all hours while the DHS COVID vaccine distribution pod is open. Staff at the pod can use telephonic interpretation services to address the language needs of any non-English/Spanish speaker that arrives.

Information related to the Agency’s COVID-response, as well as details on how federal waivers and rule changes impact benefits eligibility and updated procedures for the receipt of benefits have been professionally translated and posted on the multi-lingual pages of the HRA and DHS websites.

#### *9 – Subcategory: Licenses, Permits, and Registrations*

**If your agency issues licenses, permits, and registrations, identify its progress toward providing language access when issuing licenses, permits, and registrations.**

DSS/HRA/DHS does not issue any licenses, permits or registrations.

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<sup>20</sup> DHS COVID vaccine distribution pod is not open to the public. It is only providing services to DHS staff and clients who qualify for the vaccine under the rules established by the NY State Department of Health.



## Section 7: Training

### Explain how the agency will train staff on its language access policies and procedures

DSS/HRA/DHS has a training, developed by ORIA, that covers the language access services required by law, as well as all Agency policies and procedures regarding language access. The Agency's LEP training reminds staff about the diverse communities that we serve, reviews federal, state, and local laws for providing services to LEP clients, and provides detailed instructions on how and when to access telephonic interpretation services, in-person interpretation services, sign language interpretation services, and written translations. Staff are challenged with a series of "tough situations" and reminded of the importance of accurately recording a client's language. Finally, the LEP training provides ORIA's contact information in the event staff have any further questions or client communications challenges and require support.

ORIA updates the Agency's LEP training whenever there are changes to the language access policies and procedures. Additionally, the trainings are also updated once a year to update the scenarios and ensure that the training is engaging.

All DSS/HRA/DHS front-line staff, including outreach staff, as well as their managers and supervisors, must receive LEP training every year. Incoming staff receive LEP training during their onboarding process. Many staff receive the training from professional trainers at OPPT, but ORIA also conducts several train-the-trainer sessions and direct staff trainings each year. At HRA, staff trainings are tracked in the Online Training Tracking System (OTTS), a purpose-developed database. It also tracks who has registered for and completed trainings. At DHS, information about training registration and completion is tracked in a program called the Human Services Learning Center (HSLC). HSLC also houses DHS trainings for staff to access online or virtually.

In 2021, DHS rolled out an additional training, covering many of the same topics and scenarios, to all DHS provider staff. The Agency is committed to continuing to share this training resource with our providers, incorporating feedback and updates to ensure that each year our training is more relevant, more interesting and more educational than the year before.

## Section 8: Record keeping and evaluation

**Identify the progress your agency has made in record keeping of language services and monitoring the delivery and quality of language services.**

The largest of HRA's program areas, Cash Assistance and the Supplemental Nutrition Assistance Program (SNAP), record client data in a state-controlled system called the Welfare Management System (WMS). For each case, WMS records a separate preferred language for speaking and reading. Language choices are listed in a drop-down menu of 106 speaking languages and 102 reading languages.<sup>21</sup>

HRA employees enter information into WMS and record client interactions through an interface called the Paperless Office System (POS). For specific client interactions, including new applications, re-certifications and certain types of case changes, POS requires staff to record how language services were provided.

Throughout the Agency, other program areas use their own client tracking systems, including the CARES program at DHS, APSNet at the Adult Protective Services Program and HASAWeb for the HIV/AIDS Services Administration. All of these programs track unique speaking and reading languages for each case. As a part of the Agency's mandated language access training, all staff are instructed to record how language services were provided and the interpreter ID number of a professional telephonic, on-site or sign language interpreter in the case notes portion of the client record.

ORIA is constantly monitoring the Agency's language services vendors, including reviewing multiple interpreter scheduling programs, hundreds of interpreter timesheets and staff/client complaints, to ensure that our clients and staff are receiving the highest quality language services.

In 2020, DSS/HRA/DHS staff called for telephonic interpretation 279,430 times. The average wait-time to speak with an interpreter was 3.1 seconds. In 2020, ORIA submitted only 21 complaints to Language Line Solutions, our telephonic interpretation services vendor, regarding dropped calls or unprofessional behavior by interpreters.

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<sup>21</sup> Differences in the spoken versus written lists reflect a larger number of spoken Chinese dialects than there are forms of Chinese writing. Other variations reflect disability related options, such as Braille and sign language.

ORIA closely tracks monthly reports on the number of canceled, missed or unfulfilled appointments by our primary in-person interpretation services vendor. In 2020, Geneva Worldwide, our initial service vendor, was unable to provide an interpreter for 4% of appointments. Because even a low unfilled rate is unacceptable when clients need our support, DSS/HRA/DHS engaged a second, in-person interpretation services vendor in 2019.

Language Line Solutions, the DSS/HRA/DHS vendor for written translations, reviews each document for formatting and translation errors before the written translation is finalized and returned to the Agency. Out of 979 document translation requests in 2020, only 34 documents (3%) were returned for errors. Despite having a low error rate, DSS/HRA/DHS engaged a secondary written translation vendor in 2019 to provide quality assurance and review of translated documents. Eriksen Translations, our secondary vendor, produced the Agency's updated translation glossary in 2019, and continues to review and provide comment on high-profile documents.

In addition to carefully monitoring service and contract data, ORIA engages regularly with center-based staff, program leadership, Agency outreach units, community-based organizations (CBOs), immigrant clients, and members of our Language Access Working Group for a full understanding of where our services need to be improved. The Office of Constituent Services tracks all language access complaints received by the Agency, 311, nyc.gov and/or other elected officials and shares this information with ORIA. By putting all these sources together, ORIA can quickly identify and correct any gaps in service in programs throughout the Agency.

## Section 9: Resource analysis and planning

Identify the progress your agency has made in managing its language access resources (including staff and contracted services) to facilitate and/or improve language access.

As a large Agency with more than three million clients, DSS/HRA/DHS is fully committed to ensuring that all LEP clients receive the language access services and support that they need. The Agency's contracts for telephonic interpretation, written translation, in-person interpretation and sign language interpretation reflect this level of dedication.

All DSS/HRA/DHS language services contracts are procured through the DCAS Underlying Requirements Contracts. The Agency is in the process of extending the current collection of contracts, which expire at the end of fiscal year 2021 (FY21), for one additional year. The Agency understands that DCAS plans to rebid all of the language services contracts in fiscal year 2022 (FY22). DSS/HRA/DHS expects to buy into these new contracts for fiscal year 2023 (FY23) and fiscal year 2024 (FY24).

Service	Vendor	Current Contract End Date	FY21 Contract Value	Pending FY22 Contract Value <sup>22</sup>
Written translation services	Language Line Solutions, Inc.	6/2/21	\$2,705,800	\$1,800,000
Telephonic interpretation services	Language Line Solutions, Inc.	6/2/21	\$1,904,450	\$2,560,000
In-person interpretation services	Geneva Worldwide, Inc.	6/30/21	\$259,500	\$301,000
Sign language interpretation services	Accurate Communication, Inc.	4/30/21	\$163,200	\$137,500

<sup>22</sup> FY22 values are pending budgetary approval at all levels.

Bilingual staff testing	LM Language Services, Inc.	6/30/23	\$10,000	\$10,000
Secondary in-person interpretation services	Accurate Communication, Inc.	6/30/21	\$15,000	Not yet determined
Quality assurance for written translations	Eriksen Translations, Inc.	6/30/21	\$20,000	Not yet determined

The Agency's Office of Refugee and Immigrant Affairs (ORIA) includes a five-member, full-time language access team to manage contracts, provide staff guidance on how to access all the Agency's language access resources, develop language access tools and trainings, and advise the Agency on language access policies and procedures.

In addition to having a dedicated team working on language access issues, many of the Agency's other units incorporate the provision of language access services into their daily work. The Office of Communications and Marketing (OCM) ensures that Agency signage and outreach materials are fully multi-lingual. The Office of Policy, Procedures and Trainings (OPPT) submits every new and updated form/notice for translation and provides hundreds of hours of LEP training each year. The Information and Technology Services (ITS) team ensures that staff have dual-handset phones and that our Video Remote Interpretation (VRI) stations for working with sign language clients remain functional.

While language services contracts and dedicated administrative teams represent important tools, DSS/HRA/DHS recognizes that our most valuable resource are front-line staff members who provide language services to thousands of clients on a daily basis. To provide the highest quality service to New York City's diverse, multi-lingual residents, DSS/HRA/DHS needs a diverse, multi-lingual staff. As of April 2019, the Agency had more than 1,047 self-reported bilingual staff members who collectively speak 70 languages.

As a part of our commitment to a multi-lingual workforce, DSS is pleased to announce the success of our partnership in the ASL Direct program. In conjunction with DCAS and the Mayor's Office for People with Disabilities, DSS Infoline (the Agency's call center) hired a staff member fluent in American Sign Language (ASL) in 2019. This staff member answers questions via a secure, confidential, internet video feed from members of New York's deaf and signing community.

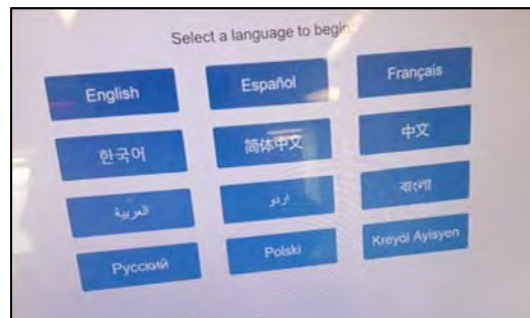
## Section 10: Outreach and public awareness of language access services

Identify the progress your agency has made in implementing strategies and outreach activities that will create public awareness of your agency's language assistance services.

DSS/HRA/DHS explicitly informs the public of the availability of free language services through:

- posters in all walk-in centers (for details, see Section 6, Subcategory 6)
- notices on tickets in walk-in centers
- notices of free language services in application and renewal packets
- Agency outreach presentations and events

Most clients at walk-in SNAP and Job Centers begin by using a self-service check-in kiosk. These kiosks, which are available in 12 languages, reduce wait time by allowing clients to generate their own service tickets.



In addition to giving a ticket number, the kiosk-generated ticket identifies the client's language of preference, thus creating an additional prompt for staff to inquire as to whether language services may be necessary, and alerting the client if a different preferred language is recorded. The ticket informs the client, in 12 languages, that free language services are available and that a Social Security number is not required to apply for HRA benefits.

ST NICHOLAS JOB CENTER  
FRIDAY, JANUARY 31, 2020 1:49:36 PM  
FLOOR: 2  
CASH ASSISTANCE

**PI 5033**

CA APPLICATION INTERVIEW

LANGUAGE SPOKEN: ENGLISH

All are welcome and have a right to apply for HRA benefits. You do not need a social security number to apply. You have a right to free language services. If you have a complaint, ask to speak with a supervisor or call 311.

Todos son bienvenidos y tienen derecho a solicitar los beneficios de la HRA. No necesita un número de seguro social para la

If a client's language of preference is anything other than English, the self-service check-in kiosk delivers a Notice of Free Interpretation Services (DSS-4) with each ticket. The Notice of Free Interpretation Services reads, in 12 languages, "You Have a Right to Free Interpretation Services. Please tell a worker if you want to speak with us in a language other than English or in sign language. If you have a question, comment or complaint about the interpretation services provided, please call 311. Filing a complaint will not affect your case."



**You Have a Right to Free Interpretation Services**

We have free interpretation services available. Please tell a worker if you want to speak with us in a language other than English or in sign language. You can simply show a worker the "I Speak" card below. If you have a question, comment or complaint about the interpretation services provided, please call 311. Filing a complaint will not affect your case.

**Usted tiene derecho a recibir servicios de interpretación gratuitos**

Contamos con servicios de interpretación gratuitos. Si desea hablar con nosotros en un idioma distinto al inglés o en lenguaje de señas, hágaselo saber a un empleado, simplemente muéstrele la tarjeta "I Speak" que aparece a continuación. Si tiene alguna pregunta, comentario o queja acerca de los servicios de interpretación que brindamos, llame al 311. La presentación de una queja no tendrá incidencia sobre su caso.

**您有權利使用免費口譯服務**

我們提供免費的口譯服務。如果您希望用英語以外的語言或手語和我們溝通，請告訴我們的工作人員。您只要向工作人員出示底下的「我說」(I Speak) 卡就可以了。如果您對我們提供的口譯服務有疑問、評論、或申訴，請致電 311。提交申訴將不會影響您的個案。

**Вы имеете право на бесплатные услуги устного перевода**

Мы предоставим вам бесплатные услуги устного перевода. Сообщите сотруднику, если вы хотите общаться с нами не на английском, а на другом языке или на языке жестов. Вы можете просто показать сотруднику

This Notice of Free Interpretation Services (DSS-4) is also included, on 8.5x11 paper, in all Agency application and renewal packets.



In addition to these printed notices, there are several HRA and DHS outreach teams that meet and interact with the public, community-based organizations, and elected officials on a regular basis. All team members have access to interpretation services, and share information with members of the public regarding the Agency's use of language services.

As a part of our commitment to a multi-lingual workforce, DSS successfully launched the ASL Direct program in 2019. In conjunction with DCAS and the Mayor's Office for People with Disabilities, DSS's Infoline (the Agency's call center) hired a staff member fluent in American Sign Language (ASL). This staff member answers questions via a secure, confidential, internet video feed from members of New York's deaf and signing community.

## Section 11: Language Access complaints

**Describe how members of the public can submit language access complaints, questions and requests to the agency**

Members of the public can submit language access complaints, questions or requests in any of the following ways:

- ☐ Call 311
- ☐ Call Infoline at 718-577-1399
- ☐ Call the DHS Ombudsman Unit at 1-800-994-6494
- ☐ Call ASL Direct (Video Phone only) at 347-474-4231
- ☐ Speak to the Director at any of our walk-in sites or residential locations
- ☐ Click on “contact us” at [nyc.gov/hra](http://nyc.gov/hra) or [nyc.gov/dhs](http://nyc.gov/dhs)
- ☐ Email ORIA at [oria@dss.nyc.gov](mailto:oria@dss.nyc.gov)

All complaints or comments regarding DSS/HRA/DHS received through 311, Infoline, the Ombudsman Unit, ASL Direct, or “contact us” are directed to the DSS Office of Constituent Services. Issues are summarized by agents and then sent as emails that are uploaded directly into the Internet Quorum (IQ) program. Any complaints that include a language component are forwarded to ORIA, or to ORIA and a specific program area for resolution. If a complaint is solely limited to language services concerns, ORIA will work with the program involved to ensure that all staff are reminded of their language access duties, and address any systematic language access concerns. If substantive case issues are involved as well, ORIA will work with the appropriate program to ensure that both substantive case issues as well as language access concerns are addressed.

Complaints received at walk-in sites or residential locations are managed by the leadership team at that location.

Complaints received by ORIA are resolved through the same process as the Office of Constituent Services.

As discussed in detail in Section 10, DSS/HRA/DHS informs clients of their right to free interpretation services through four primary means: a free interpretation services poster, a welcome poster, the ticketnotice, and a printed notice of free interpretation services. All four of these documents refer clients to 311 for language access complaints.

The Agency's free interpretation services poster reads, in 20 languages: *"You have the right to free interpretation services at this location....If you have a question, comment or complaint about translation or interpretation at this location, please speak to a worker or call 311. Filing a complaint will not affect your case."*

The Agency's welcome poster, which hangs in all walk-in locations, reads, in 12 languages: *"Welcome toHRA/DHS. Free interpretation services are available. For comments or complaints please call 311."*

The message printed on every ticket generated by a self-service check-in kiosk reads, in 12 languages: *"All are welcome and have the right to apply for HRA benefits....If you have a complaint, ask to speak with a supervisor or call 311."*

The Agency's Notice of Free Interpretation Services, which is printed at kiosks with tickets and distributed in all walk-in locations reads, in 12 languages: *"You have the right to free interpretation services....If you have a question, comment or complaint about the interpretation services provided, please call 311. Filing a complaint will not affect your case."*

## Section 12: Implementation Plan Logistics

**Describe how the Language Access Coordinator will implement the Language Access Implementation plan and provide goals, milestones and times.**

The implementation of this Language Access Implementation Plan will be overseen by ORIA, under the leadership of the Language Access Coordinator: Marah Rhoades, Deputy Commissioner, Office of Advocacy and Outreach. The Language Access staff at ORIA will work with Agency leadership, program leaders and technical staff to ensure that each of the policies and procedures listed in this report is followed by front-line staff and that goals and timelines included here are met.

The Language Access team at ORIA will continue to meet regularly with the Agency’s internal Language Access Working Group. The group, which meets a few times a year, consists of one or two representatives of each program area. The purpose of the group is to share information about available language access resources, review data and collectively plan for upcoming needs.

This implementation plan will be updated at least once every three years and the updates will be posted on [nyc.gov/hra](http://nyc.gov/hra) and [nyc.gov/dhs](http://nyc.gov/dhs), as required by Local Law 30. Intermediary plans will be created and posted more frequently if deemed necessary by HRA’s Language Access Coordinator and Agency leadership.

Details on the implementation plan of the Agency’s 2021 – 2024 language access goals are below. For a detailed justification of each goal, see Section 3.

Language access goal	Milestones	Responsible staff	Deadline
Increase # of translated documents available at DHS	<ul style="list-style-type: none"> <li>▪ Confirm total universe of forms.</li> <li>▪ Review all forms for plain language and snippets</li> <li>▪ Translate and post all Agency-generated forms.</li> <li>▪ Work with providers to gather all forms.</li> </ul>	ORIA, Office of Program Development and Implementation (OPDI), OPPT and	Ongoing

	<ul style="list-style-type: none"> <li>▪ Review provider forms.</li> <li>▪ Translate provider forms.</li> </ul>	DHS program areas	
Improve telephone access	<ul style="list-style-type: none"> <li>• Procure an updated IVR system.</li> <li>• Design a system that is multi-lingual but comprehensive</li> <li>• Translate all prompts.</li> <li>• Test to ensure user accessibility</li> </ul>	Office of Constituent Services (OCS), Information Technology Services (ITS) and ORIA	Dec. 2021
Improve knowledge about community partners	<ul style="list-style-type: none"> <li>▪ Create a survey tool</li> <li>▪ Administer the survey to CBO partners</li> <li>▪ Gather and analyze resulting data</li> <li>▪ Create partnerships with organizations that serve populations that are underrepresented in current partnerships.</li> </ul>	Office of Outreach, Office of Evaluation and Research (OER)	Jan. 2023
Continue to provide LEP training	<ul style="list-style-type: none"> <li>▪ Update LEP training each year to include new information and keep old information relevant and fresh</li> <li>▪ Work with training teams to provide in-person training or generate an eLearning platform.</li> </ul>	OPPT, ORIA and program leadership	Each calendar year
Provide LEP training to DHS providers	<ul style="list-style-type: none"> <li>▪ Modify LEP training to be relevant to DHS providers</li> <li>▪ Gather staff contact information from providers</li> <li>▪ Register staff and distribute training accordingly</li> </ul>	OPPT, OPDI, DHS program areas and DHS providers	Jan 2022
Share language service contracts with providers	<ul style="list-style-type: none"> <li>▪ Identify providers in need of access to language services</li> </ul>	ORIA, Agency Chief Contracting Officer (ACCO)	Ongoing

	<ul style="list-style-type: none"> <li>▪ Arrange for all providers to sign an agreement with the Agency</li> <li>▪ Track service usage to ensure fiscal accountability</li> </ul>	and Program areas	
Increase bilingual staff	<ul style="list-style-type: none"> <li>▪ Identify program areas and locations in need of additional staff</li> <li>▪ Work with HRS to inform programs about selective certification and help include language preferences in upcoming DCAS job notices</li> </ul>	Human Resource Services (HRS), ORIA and Program areas	Jan. 2024

DSS/HRA/DHS Lang. Services by Language, by Program by Type of Service			
Program	Language	Type of Service	No. of instances
Infoline	Afrikaans	Telephonic	1
CAS	Akan	Telephonic	1
Cash Assit.	Akan	Telephonic	6
Families (DHS)	Akan	Telephonic	5
HPA	Akan	Telephonic	2
Infoline	Akan	Telephonic	5
Mayor's Office	Akan	Telephonic	2
ODVEIS	Akan	Telephonic	1
OLA	Akan	Telephonic	1
SNAP	Akan	Telephonic	4
Unknown/Other	Akan	Telephonic	8
APS	Albanian	In-Person	2
APS	Albanian	Telephonic	5
CAS	Albanian	Telephonic	16
Cash Assit.	Albanian	Telephonic	161
Families (DHS)	Albanian	Telephonic	16
HASA	Albanian	Telephonic	1
IDNYC	Albanian	Telephonic	3
Infoline	Albanian	Telephonic	100
Mayor's Office	Albanian	Telephonic	25
MICSA	Albanian	Telephonic	13
OAO	Albanian	Telephonic	1
OCC	Albanian	Telephonic	3
ODVEIS	Albanian	Telephonic	2
Program Account.	Albanian	Telephonic	3
SNAP	Albanian	Telephonic	99
Unknown/Other	Albanian	Telephonic	47
Adult Singles	Amharic	Telephonic	1
Cash Assit.	Amharic	Telephonic	1
IDNYC	Amharic	Telephonic	1
Infoline	Amharic	Telephonic	2
SNAP	Amharic	Telephonic	1
Unknown/Other	Amharic	Telephonic	1
Adult Families	Arabic	Telephonic	1
Adult Singles	Arabic	Telephonic	40
Agency-wide	Arabic	Document Translation	537
APS	Arabic	In-Person	10
APS	Arabic	Telephonic	38

Acronyms	
APS	Adult Protective Services
ASL	American Sign Language
CAS	Customized Assistance Services
Cash Assit.	Cash Assistance Program
EEO	Equal Employment Office
HASA	HIV/AIDS Services Administration
HCSP	Home Care Service Program
HPA	Homelessness Prevention Administration
MICSA	Medical Insurance and Community Services Administration
OAO	Office of Advocacy and Outreach
OCC	Office of Constituent Services
OCHIA	Office of Citywide Health Insurance Access
OCSS	Office of Child Support Services
ODVEIS	Office of Domestic Violence and Emergency Intervention Services
OER	Office of Evaluation and Research
OLA	Office of Legal Affairs
Program Account	Office of Program Accountability
SNAP	Supplemental Nutrition Assistance Program

CAS	Arabic	Telephonic	40
Cash Assit.	Arabic	Telephonic	527
EEO	Arabic	Telephonic	1
Fair Fares	Arabic	Telephonic	4
Fair Hearings	Arabic	Telephonic	1
Families (DHS)	Arabic	Telephonic	96
HASA	Arabic	Telephonic	3
HCSP	Arabic	Telephonic	10
HPA	Arabic	Telephonic	43
IDNYC	Arabic	In-Person	7
IDNYC	Arabic	Telephonic	20
Infoline	Arabic	Telephonic	827
Mayor's Office	Arabic	Telephonic	55
MICSA	Arabic	Telephonic	57
OAQ	Arabic	Telephonic	8
OCC	Arabic	Telephonic	61
OCHIA	Arabic	Telephonic	1
OCSS	Arabic	Telephonic	15
ODVEIS	Arabic	Telephonic	56
OLA	Arabic	Telephonic	1
Program Account.	Arabic	Telephonic	28
Reasonable Accommodation	Arabic	Telephonic	9
SNAP	Arabic	Telephonic	531
Unknown/Other	Arabic	Telephonic	262
Cash Assist.	Armenian	Telephonic	2
IDNYC	Armenian	Telephonic	1
Infoline	Armenian	Telephonic	5
Mayor's Office	Armenian	Telephonic	3
MICSA	Armenian	Telephonic	2
SNAP	Armenian	Telephonic	2
Adult Families	ASL	In-Person	5
Adult Families	ASL	Video	5
Adult Singles	ASL	In-Person	38
Adult Singles	ASL	Video	77
APS	ASL	In-Person	22
APS	ASL	Video	21
Career Services	ASL	In-Person	4
CAS	ASL	In-Person	7
Cash Assist.	ASL	In-Person	53
Cash Assist.	ASL	Video	59
Families (DHS)	ASL	In-Person	18
Families (DHS)	ASL	Video	69



HASA	ASL	In-Person	3
HASA	ASL	Video	3
HCSP	ASL	In-Person	2
HPA	ASL	In-Person	2
HPA	ASL	Video	6
IDNYC	ASL	In-Person	2
MICSA	ASL	In-Person	29
MICSA	ASL	Video	8
OAQ	ASL	Video	22
OCSS	ASL	In-Person	8
OCSS	ASL	Video	3
ODVEIS	ASL	In-Person	1
ODVEIS	ASL	Video	2
Program Account.	ASL	In-Person	9
SNAP	ASL	In-Person	5
SNAP	ASL	Video	10
Families (DHS)	Assyrian	Telephonic	1
Unknown/Other	Assyrian	Telephonic	1
IDNYC	Bahasa	Telephonic	2
CAS	Bambara	Telephonic	3
Cash Assit.	Bambara	Telephonic	2
Families (DHS)	Bambara	Telephonic	9
HASA	Bambara	Telephonic	1
HPA	Bambara	Telephonic	1
Infoline	Bambara	Telephonic	5
MICSA	Bambara	Telephonic	2
SNAP	Bambara	Telephonic	2
Unknown/Other	Bambara	Telephonic	1
Administration	Bengali	Telephonic	3
Adult Families	Bengali	Telephonic	10
Adult Singles	Bengali	Telephonic	11
Agency-wide	Bengali	Document Translation	444
APS	Bengali	In-Person	4
APS	Bengali	Telephonic	10
CAS	Bengali	Telephonic	106
Cash Assit.	Bengali	Telephonic	975
EEO	Bengali	Telephonic	2
Fair Fares	Bengali	Telephonic	14
Fair Hearings	Bengali	Telephonic	5
Families (DHS)	Bengali	Telephonic	170
HASA	Bengali	Telephonic	2
HCSP	Bengali	Telephonic	38

HPA	Bengali	Telephonic	54
IDNYC	Bengali	Telephonic	83
Infoline	Bengali	Telephonic	1,457
Mayor's Office	Bengali	Telephonic	154
MICSA	Bengali	Telephonic	156
OAo	Bengali	Telephonic	16
OCC	Bengali	Telephonic	41
OCHIA	Bengali	Telephonic	1
OCSS	Bengali	Telephonic	11
ODVEIS	Bengali	Telephonic	164
OLA	Bengali	Telephonic	3
Program Account.	Bengali	Telephonic	49
Reasonable Accommodation	Bengali	Telephonic	5
SNAP	Bengali	Telephonic	819
Unknown/Other	Bengali	Telephonic	599
SNAP	Berber	Telephonic	2
Cash Assit.	Bosnian	Telephonic	6
IDNYC	Bosnian	Telephonic	2
Infoline	Bosnian	Telephonic	3
Mayor's Office	Bosnian	Telephonic	1
Reasonable Accommodation	Bosnian	Telephonic	1
SNAP	Bosnian	Telephonic	1
Unknown/Other	Bosnian	Telephonic	3
APS	Bulgarian	In-Person	1
Cash Assit.	Bulgarian	Telephonic	1
Families (DHS)	Bulgarian	Telephonic	1
Infoline	Bulgarian	Telephonic	5
MICSA	Bulgarian	Telephonic	1
SNAP	Bulgarian	Telephonic	3
Unknown/Other	Bulgarian	Telephonic	2
Adult Singles	Burmese	Telephonic	2
CAS	Burmese	Telephonic	1
Cash Assit.	Burmese	Telephonic	12
HASA	Burmese	Telephonic	1
IDNYC	Burmese	In-Person	3
IDNYC	Burmese	Telephonic	11
Infoline	Burmese	Telephonic	27
Mayor's Office	Burmese	Telephonic	2
MICSA	Burmese	Telephonic	1
SNAP	Burmese	Telephonic	11
Unknown/Other	Burmese	Telephonic	11
Cash Assit.	Cambodian	Telephonic	5

Infoline	Cambodian	Telephonic	3
Mayor's Office	Cambodian	Telephonic	10
SNAP	Cambodian	Telephonic	3
Administration	Cantonese	Telephonic	8
Adult Families	Cantonese	Telephonic	1
Adult Singles	Cantonese	Telephonic	65
APS	Cantonese	In-Person	23
APS	Cantonese	Telephonic	139
CAS	Cantonese	Telephonic	111
Cash Assit.	Cantonese	Telephonic	338
EEO	Cantonese	Telephonic	9
Fair Fares	Cantonese	Telephonic	13
Fair Hearings	Cantonese	Telephonic	1
HASA	Cantonese	Telephonic	27
HCSP	Cantonese	Telephonic	99
HPA	Cantonese	Telephonic	21
IDNYC	Cantonese	Telephonic	166
Infoline	Cantonese	Telephonic	4,130
Mayor's Office	Cantonese	Telephonic	600
MICSA	Cantonese	Telephonic	293
OAQ	Cantonese	Telephonic	22
OCC	Cantonese	Telephonic	96
OCHIA	Cantonese	Telephonic	1
OCSS	Cantonese	Telephonic	12
ODVEIS	Cantonese	Telephonic	34
OLA	Cantonese	Telephonic	3
Program Account.	Cantonese	Telephonic	87
Reasonable Accommodation	Cantonese	Telephonic	10
SNAP	Cantonese	Telephonic	1,780
Unknown/Other	Cantonese	Telephonic	1,258
Cash Assist.	Chin/Chin Hakha	Telephonic	1
Fair Fares	Chin/Chin Hakha	Telephonic	1
Infoline	Chin/Chin Hakha	Telephonic	2
Unknown/Other	Chin/Chin Hakha	Telephonic	2
APS	Croatian	In-Person	2
Cash Assist.	Croatian	Telephonic	2
IDNYC	Croatian	Telephonic	2
Infoline	Croatian	Telephonic	3
MICSA	Croatian	Telephonic	1
OCC	Croatian	Telephonic	1
SNAP	Croatian	Telephonic	3
Unknown/Other	Croatian	Telephonic	2

Cash Assist.	Czech	Telephonic	1
Infoline	Czech	Telephonic	3
MICSA	Czech	Telephonic	1
Unknown/Other	Czech	Telephonic	1
Cash Assist.	Dari	Telephonic	3
Infoline	Dari	Telephonic	3
Mayor's Office	Dari	Telephonic	1
ODVEIS	Dari	Telephonic	1
SNAP	Dari	Telephonic	1
Unknown/Other	Dari	Telephonic	3
Cash Assist.	Diula	Telephonic	1
Cash Assist.	Dutch	Telephonic	1
HPA	Dutch	Telephonic	1
OLA	Dutch	Telephonic	1
Agency-wide	English	Document Translation	330
Adult Singles	Farsi	Telephonic	1
APS	Farsi	Telephonic	4
CAS	Farsi	Telephonic	1
Cash Assist.	Farsi	Telephonic	14
Fair Hearings	Farsi	Telephonic	1
Families (DHS)	Farsi	Telephonic	4
HCSP	Farsi	Telephonic	1
HPA	Farsi	Telephonic	5
IDNYC	Farsi	In-Person	1
Infoline	Farsi	Telephonic	20
Mayor's Office	Farsi	Telephonic	4
MICSA	Farsi	Telephonic	2
ODVEIS	Farsi	Telephonic	1
SNAP	Farsi	Telephonic	13
Unknown/Other	Farsi	Telephonic	9
CAS	Finnish	Telephonic	1
Adult Families	French	Telephonic	2
Adult Singles	French	Telephonic	34
Agency-wide	French	Document Translation	472
APS	French	In-Person	2
APS	French	Telephonic	8
CAS	French	Telephonic	13
Cash Assist.	French	Telephonic	249
Families (DHS)	French	Telephonic	772
HASA	French	Telephonic	209
HPA	French	Telephonic	83
IDNYC	French	In-Person	11

IDNYC	French	Telephonic	49
Infoline	French	Telephonic	136
Mayor's Office	French	Telephonic	28
MICSA	French	Telephonic	18
OAQ	French	Telephonic	5
OCC	French	Telephonic	7
OCCS	French	Telephonic	11
ODVEIS	French	Telephonic	45
Program Account.	French	Telephonic	16
Reasonable Accommodation	French	Telephonic	1
SNAP	French	Telephonic	97
Unknown/Other	French	Telephonic	283
CAS	Fukienese	Telephonic	3
Cash Assit.	Fukienese	Telephonic	1
IDNYC	Fukienese	Telephonic	1
Infoline	Fukienese	Telephonic	6
Mayor's Office	Fukienese	Telephonic	2
SNAP	Fukienese	Telephonic	1
Unknown/Other	Fukienese	Telephonic	1
Adult Singles	Fulani	Telephonic	1
CAS	Fulani	Telephonic	1
Cash Assit.	Fulani	Telephonic	13
Families (DHS)	Fulani	Telephonic	8
HASA	Fulani	Telephonic	5
HPA	Fulani	Telephonic	1
Infoline	Fulani	Telephonic	9
MICSA	Fulani	Telephonic	1
ODVEIS	Fulani	Telephonic	2
SNAP	Fulani	Telephonic	6
Unknown/Other	Fulani	Telephonic	16
APS	Fuzhou	Telephonic	3
CAS	Fuzhou	Telephonic	10
Cash Assit.	Fuzhou	Telephonic	61
Families (DHS)	Fuzhou	Telephonic	27
HPA	Fuzhou	Telephonic	2
IDNYC	Fuzhou	Telephonic	7
Infoline	Fuzhou	Telephonic	63
Mayor's Office	Fuzhou	Telephonic	11
MICSA	Fuzhou	Telephonic	2
OAQ	Fuzhou	Telephonic	1
OCC	Fuzhou	Telephonic	4
ODVEIS	Fuzhou	Telephonic	2

Program Account.	Fuzhou	Telephonic	3
SNAP	Fuzhou	Telephonic	12
Unknown/Other	Fuzhou	Telephonic	15
APS	Georgian	Telephonic	8
Cash Assit.	Georgian	Telephonic	15
Families (DHS)	Georgian	Telephonic	19
HPA	Georgian	Telephonic	1
IDNYC	Georgian	In-Person	1
IDNYC	Georgian	Telephonic	5
Infoline	Georgian	Telephonic	12
Mayor's Office	Georgian	Telephonic	4
MICSA	Georgian	Telephonic	1
OCSS	Georgian	Telephonic	2
Program Account.	Georgian	Telephonic	1
SNAP	Georgian	Telephonic	5
Unknown/Other	Georgian	Telephonic	8
CAS	German	Telephonic	1
Cash Assit.	German	Telephonic	1
IDNYC	German	In-Person	5
IDNYC	German	Telephonic	1
Mayor's Office	German	Telephonic	1
MICSA	German	Telephonic	1
SNAP	German	Telephonic	2
Cash Assit.	Gheg	Telephonic	1
SNAP	Gheg	Telephonic	1
Adult Singles	Greek	Telephonic	3
APS	Greek	In-Person	3
APS	Greek	Telephonic	16
CAS	Greek	Telephonic	7
Cash Assit.	Greek	Telephonic	31
HASA	Greek	Telephonic	1
HCSP	Greek	Telephonic	1
HPA	Greek	Telephonic	7
IDNYC	Greek	Telephonic	8
Infoline	Greek	Telephonic	52
Mayor's Office	Greek	Telephonic	40
MICSA	Greek	Telephonic	7
OCSS	Greek	Telephonic	1
ODVEIS	Greek	Telephonic	1
SNAP	Greek	Telephonic	30
Unknown/Other	Greek	Telephonic	17
CAS	Gujarati	Telephonic	5

Cash Assit.	Gujarati	Telephonic	3
IDNYC	Gujarati	Telephonic	2
Infoline	Gujarati	Telephonic	5
Mayor's Office	Gujarati	Telephonic	2
SNAP	Gujarati	Telephonic	3
Unknown/Other	Gujarati	Telephonic	3
Adult Families	Haitian Creole	Telephonic	1
Adult Singles	Haitian Creole	Telephonic	20
Agency-wide	Haitian Creole	Document Translation	531
APS	Haitian Creole	In-Person	10
APS	Haitian Creole	Telephonic	69
CAS	Haitian Creole	Telephonic	47
Cash Assit.	Haitian Creole	Telephonic	331
EEO	Haitian Creole	Telephonic	1
Families (DHS)	Haitian Creole	Telephonic	298
HASA	Haitian Creole	Telephonic	64
HCSP	Haitian Creole	Telephonic	20
HPA	Haitian Creole	Telephonic	84
IDNYC	Haitian Creole	In-Person	1
IDNYC	Haitian Creole	Telephonic	33
Infoline	Haitian Creole	Telephonic	609
Mayor's Office	Haitian Creole	Telephonic	86
MICSA	Haitian Creole	Telephonic	53
OA0	Haitian Creole	In-Person	3
OA0	Haitian Creole	Telephonic	4
OCC	Haitian Creole	Telephonic	32
OCHIA	Haitian Creole	Telephonic	1
OCSS	Haitian Creole	Telephonic	6
ODVEIS	Haitian Creole	Telephonic	19
OER	Haitian Creole	Telephonic	1
OLA	Haitian Creole	Telephonic	2
Program Account.	Haitian Creole	In-Person	1
Program Account.	Haitian Creole	Telephonic	11
Reasonable Accommodation	Haitian Creole	Telephonic	2
SNAP	Haitian Creole	Telephonic	442
Streets	Haitian Creole	In-Person	2
Unknown/Other	Haitian Creole	Telephonic	238
Infoline	Hakka	Telephonic	1
Cash Assit.	Hausa	Telephonic	1
Families (DHS)	Hausa	Telephonic	11
HPA	Hausa	Telephonic	1
Mayor's Office	Hausa	Telephonic	1

Unknown/Other	Hausa	Telephonic	11
Adult Singles	Hebrew	Telephonic	1
CAS	Hebrew	Telephonic	1
Cash Assit.	Hebrew	Telephonic	13
HPA	Hebrew	Telephonic	4
IDNYC	Hebrew	In-Person	2
Infoline	Hebrew	Telephonic	23
Mayor's Office	Hebrew	Telephonic	3
MICSA	Hebrew	Telephonic	1
ODVEIS	Hebrew	Telephonic	2
Reasonable Accommodation	Hebrew	Telephonic	1
SNAP	Hebrew	Telephonic	8
Unknown/Other	Hebrew	Telephonic	5
Adult Singles	Hindi	Telephonic	3
APS	Hindi	In-Person	5
APS	Hindi	Telephonic	18
CAS	Hindi	Telephonic	6
Cash Assit.	Hindi	Telephonic	28
Families (DHS)	Hindi	Telephonic	3
HCSP	Hindi	Telephonic	1
HPA	Hindi	Telephonic	1
IDNYC	Hindi	In-Person	1
IDNYC	Hindi	Telephonic	23
Infoline	Hindi	Telephonic	84
Mayor's Office	Hindi	Telephonic	12
MICSA	Hindi	Telephonic	8
OAQ	Hindi	Telephonic	1
ODVEIS	Hindi	Telephonic	9
SNAP	Hindi	Telephonic	49
Unknown/Other	Hindi	Telephonic	34
Families (DHS)	Hmong	Telephonic	1
Mayor's Office	Hmong	Telephonic	2
Unknown/Other	Hmong	Telephonic	1
Adult Families	Hungarian	Telephonic	7
Adult Singles	Hungarian	Telephonic	1
Cash Assit.	Hungarian	Telephonic	6
HASA	Hungarian	Telephonic	1
HPA	Hungarian	Telephonic	1
IDNYC	Hungarian	Telephonic	6
Infoline	Hungarian	Telephonic	22
MICSA	Hungarian	Telephonic	2
Program Account.	Hungarian	Telephonic	1



SNAP	Hungarian	Telephonic	7
Unknown/Other	Hungarian	Telephonic	5
HPA	Igbo	Telephonic	1
Infoline	Igbo	Telephonic	1
Adult Singles	Indonesian	Telephonic	1
Cash Assit.	Indonesian	Telephonic	4
IDNYC	Indonesian	Telephonic	6
Mayor's Office	Indonesian	Telephonic	1
MICSA	Indonesian	Telephonic	1
SNAP	Indonesian	Telephonic	2
Unknown/Other	Indonesian	Telephonic	8
Adult Singles	Italian	Telephonic	1
APS	Italian	In-Person	6
APS	Italian	Telephonic	20
CAS	Italian	Telephonic	4
Cash Assit.	Italian	Telephonic	30
Families (DHS)	Italian	Telephonic	4
HCSP	Italian	Telephonic	5
HPA	Italian	Telephonic	4
IDNYC	Italian	Telephonic	7
Infoline	Italian	Telephonic	59
Mayor's Office	Italian	Telephonic	32
MICSA	Italian	Telephonic	2
OAD	Italian	Telephonic	2
OCC	Italian	Telephonic	1
ODVEIS	Italian	Telephonic	5
OLA	Italian	Telephonic	1
Program Account.	Italian	Telephonic	1
SNAP	Italian	Telephonic	17
Unknown/Other	Italian	Telephonic	17
Adult Singles	Japanese	Telephonic	7
APS	Japanese	In-Person	3
APS	Japanese	Telephonic	10
CAS	Japanese	Telephonic	2
Cash Assit.	Japanese	Telephonic	16
Fair Hearings	Japanese	Telephonic	1
Families (DHS)	Japanese	Telephonic	4
HPA	Japanese	Telephonic	1
IDNYC	Japanese	In-Person	6
IDNYC	Japanese	Telephonic	25
Infoline	Japanese	Telephonic	8
Mayor's Office	Japanese	Telephonic	4

MICSA	Japanese	Telephonic	3
OCSS	Japanese	Telephonic	2
ODVEIS	Japanese	Telephonic	2
SNAP	Japanese	Telephonic	9
Streets	Japanese	Telephonic	1
Unknown/Other	Japanese	Telephonic	18
Infoline	Karen	Telephonic	2
SNAP	Karen	Telephonic	1
Unknown/Other	Karen	Telephonic	2
Cash Assit.	Khmer	Telephonic	1
Unknown/Other	K'iche	Telephonic	6
Cash Assit.	Kinyarwanda	Telephonic	1
Administration	Korean	Telephonic	1
Adult Singles	Korean	Telephonic	7
Agency-wide	Korean	Document Translation	532
APS	Korean	In-Person	8
APS	Korean	Telephonic	113
CAS	Korean	Telephonic	20
Cash Assit.	Korean	Telephonic	198
EEO	Korean	Telephonic	1
Fair Fares	Korean	Telephonic	1
Families (DHS)	Korean	Telephonic	1
HASA	Korean	Telephonic	6
HCSP	Korean	Telephonic	10
HPA	Korean	Telephonic	20
IDNYC	Korean	In-Person	3
IDNYC	Korean	Telephonic	109
Infoline	Korean	Telephonic	566
Mayor's Office	Korean	Telephonic	239
MICSA	Korean	Telephonic	113
OAQ	Korean	Telephonic	1
OCC	Korean	Telephonic	7
OCSS	Korean	Telephonic	4
ODVEIS	Korean	Telephonic	6
OLA	Korean	Telephonic	1
Program Account.	Korean	Telephonic	13
SNAP	Korean	Telephonic	384
Unknown/Other	Korean	Telephonic	296
APS	Krio	Telephonic	2
CAS	Krio	Telephonic	2
Cash Assist.	Krio	Telephonic	2
Families (DHS)	Krio	Telephonic	3

Infoline	Krio	Telephonic	4
Mayor's Office	Krio	Telephonic	5
ODVEIS	Krio	Telephonic	1
SNAP	Krio	Telephonic	3
Unknown/Other	Krio	Telephonic	1
HASA	Kurmanji	Telephonic	1
IDNYC	Laotian	Telephonic	1
Infoline	Laotian	Telephonic	1
SNAP	Laotian	Telephonic	3
Unknown/Other	Laotian	In-Person	1
Cash Assit.	Lingala	Telephonic	2
Families (DHS)	Lingala	Telephonic	19
HASA	Lingala	Telephonic	1
MICSA	Lingala	Telephonic	1
OCC	Lingala	Telephonic	1
SNAP	Lingala	Telephonic	1
Unknown/Other	Lingala	Telephonic	5
Adult Families	Lithuanian	Telephonic	1
APS	Macedonian	Telephonic	4
CAS	Macedonian	Telephonic	1
Infoline	Macedonian	Telephonic	1
SNAP	Macedonian	Telephonic	1
IDNYC	Malay	In-Person	1
SNAP	Malay	Telephonic	1
Cash Assist.	Malayalam	Telephonic	2
IDNYC	Malayalam	Telephonic	1
Infoline	Malayalam	Telephonic	3
SNAP	Malayalam	Telephonic	3
Unknown/Other	Malayalam	Telephonic	1
Administration	Mandarin	Telephonic	5
Adult Families	Mandarin	Telephonic	3
Adult Singles	Mandarin	Telephonic	89
APS	Mandarin	In-Person	26
APS	Mandarin	Telephonic	199
CAS	Mandarin	Telephonic	325
Cash Assist.	Mandarin	Telephonic	1,941
EEO	Mandarin	Telephonic	5
Fair Fares	Mandarin	Telephonic	29
Fair Hearings	Mandarin	Telephonic	3
Families (DHS)	Mandarin	Telephonic	189
HASA	Mandarin	Telephonic	98
HCSP	Mandarin	In-Person	4

HCSP	Mandarin	Telephonic	173
HPA	Mandarin	Telephonic	121
IDNYC	Mandarin	In-Person	1
IDNYC	Mandarin	Telephonic	882
Infoline	Mandarin	Telephonic	8,991
Mayor's Office	Mandarin	Telephonic	1,887
MICSA	Mandarin	Telephonic	562
OA0	Mandarin	In-Person	4
OA0	Mandarin	Telephonic	44
OCC	Mandarin	Telephonic	147
OCHIA	Mandarin	Telephonic	8
OCSS	Mandarin	Telephonic	19
ODVEIS	Mandarin	Telephonic	202
OLA	Mandarin	Telephonic	6
Program Account.	Mandarin	Telephonic	193
Reasonable Accommodation	Mandarin	Telephonic	21
SNAP	Mandarin	Telephonic	1,790
Streets	Mandarin	Telephonic	7
Streets	Mandarin	In-Person	2
Unknown/Other	Mandarin	Telephonic	2,872
APS	Mandingo	In-Person	1
CAS	Mandingo	Telephonic	1
Cash Assit.	Mandingo	Telephonic	1
Families (DHS)	Mandingo	Telephonic	7
HASA	Mandingo	Telephonic	5
HPA	Mandingo	Telephonic	4
Infoline	Mandingo	Telephonic	1
Mayor's Office	Mandingo	Telephonic	1
MICSA	Mandingo	Telephonic	1
SNAP	Mandingo	Telephonic	1
HASA	Mandinka	Telephonic	1
Unknown/Other	Maninka	Telephonic	1
Mayor's Office	Marathi	Telephonic	1
Unknown/Other	Marshallese	Telephonic	2
CAS	Mongolian	Telephonic	1
Cash Assist.	Mongolian	Telephonic	2
HCSP	Mongolian	Telephonic	1
IDNYC	Mongolian	Telephonic	2
Infoline	Mongolian	Telephonic	2
Program Account.	Mongolian	Telephonic	1
Adult Singles	Nepali	Telephonic	3
Cash Assit.	Nepali	Telephonic	17

HCSP	Nepali	Telephonic	1
IDNYC	Nepali	Telephonic	4
Infoline	Nepali	Telephonic	13
Mayor's Office	Nepali	Telephonic	2
OCSS	Nepali	Telephonic	1
ODVEIS	Nepali	Telephonic	1
Program Account.	Nepali	Telephonic	1
SNAP	Nepali	Telephonic	1
Unknown/Other	Nepali	Telephonic	22
Cash Assist.	Nigerian Pidgin	Telephonic	1
Mayor's Office	Nigerian Pidgin	Telephonic	1
Cash Assist.	Oromo	Telephonic	1
Infoline	Oromo	Telephonic	1
Agency-wide	Other	Document Translation	12
CAS	Pashto	Telephonic	2
Cash Assit.	Pashto	Telephonic	2
HPA	Pashto	Telephonic	2
Infoline	Pashto	Telephonic	2
OCSS	Pashto	Telephonic	1
ODVEIS	Pashto	Telephonic	2
SNAP	Pashto	Telephonic	9
Unknown/Other	Pashto	Telephonic	2
Adult Families	Polish	Telephonic	1
Adult Singles	Polish	In-Person	2
Adult Singles	Polish	Telephonic	80
Agency-wide	Polish	Document Translation	440
APS	Polish	In-Person	6
APS	Polish	Telephonic	19
CAS	Polish	Telephonic	16
Cash Assit.	Polish	Telephonic	78
Families (DHS)	Polish	Telephonic	7
HASA	Polish	Telephonic	23
HCSP	Polish	Telephonic	9
HPA	Polish	Telephonic	19
IDNYC	Polish	In-Person	3
IDNYC	Polish	Telephonic	46
Infoline	Polish	Telephonic	116
Mayor's Office	Polish	Telephonic	76
MICSA	Polish	Telephonic	20
OAQ	Polish	Telephonic	2
OCC	Polish	Telephonic	1
OCSS	Polish	Telephonic	5

ODVEIS	Polish	Telephonic	9
Program Account.	Polish	Telephonic	1
SNAP	Polish	Telephonic	130
Unknown/Other	Polish	Telephonic	104
APS	Portuguese	In-Person	3
APS	Portuguese	Telephonic	2
CAS	Portuguese	Telephonic	3
Cash Assit.	Portuguese	Telephonic	37
Families (DHS)	Portuguese	Telephonic	36
HASA	Portuguese	Telephonic	4
HCSP	Portuguese	Telephonic	2
HPA	Portuguese	Telephonic	2
IDNYC	Portuguese	In-Person	2
IDNYC	Portuguese	Telephonic	16
Infoline	Portuguese	Telephonic	32
Mayor's Office	Portuguese	Telephonic	7
MICSA	Portuguese	Telephonic	6
OCSS	Portuguese	Telephonic	1
ODVEIS	Portuguese	Telephonic	5
Program Account.	Portuguese	Telephonic	2
SNAP	Portuguese	Telephonic	23
Unknown/Other	Portuguese	Telephonic	28
OCSS	Portuguese Creole	Telephonic	1
Administration	Punjabi	Telephonic	2
Adult Singles	Punjabi	Telephonic	10
APS	Punjabi	In-Person	1
APS	Punjabi	Telephonic	12
CAS	Punjabi	Telephonic	11
Cash Assit.	Punjabi	Telephonic	39
Fair Fares	Punjabi	Telephonic	1
Families (DHS)	Punjabi	Telephonic	3
HASA	Punjabi	Telephonic	1
HCSP	Punjabi	Telephonic	8
HPA	Punjabi	Telephonic	2
IDNYC	Punjabi	In-Person	1
IDNYC	Punjabi	Telephonic	14
Infoline	Punjabi	Telephonic	102
Mayor's Office	Punjabi	Telephonic	8
MICSA	Punjabi	Telephonic	5
OCSS	Punjabi	Telephonic	2
ODVEIS	Punjabi	Telephonic	18
Program Account.	Punjabi	Telephonic	2

SNAP	Punjabi	Telephonic	25
Unknown/Other	Punjabi	Telephonic	68
APS	Romanian	Telephonic	3
CAS	Romanian	Telephonic	2
Cash Assit.	Romanian	Telephonic	4
HASA	Romanian	Telephonic	6
H CSP	Romanian	Telephonic	1
HPA	Romanian	Telephonic	6
IDNYC	Romanian	Telephonic	1
Infoline	Romanian	Telephonic	8
Mayor's Office	Romanian	Telephonic	2
MICSA	Romanian	Telephonic	4
OCCS	Romanian	Telephonic	1
SNAP	Romanian	Telephonic	4
Unknown/Other	Romanian	Telephonic	4
Families (DHS)	Rundi	Telephonic	1
SNAP	Rundi	Telephonic	1
Unknown/Other	Rundi	Telephonic	1
Administration	Russian	Telephonic	12
Adult Families	Russian	Telephonic	3
Adult Singles	Russian	Telephonic	85
Agency-wide	Russian	Document Translation	537
APS	Russian	In-Person	19
APS	Russian	Telephonic	211
CAS	Russian	Telephonic	181
Cash Assit.	Russian	Telephonic	749
EEO	Russian	Telephonic	7
Fair Fares	Russian	Telephonic	3
Families (DHS)	Russian	Telephonic	118
HASA	Russian	Telephonic	47
H CSP	Russian	In-Person	2
H CSP	Russian	Telephonic	167
HPA	Russian	In-Person	1
HPA	Russian	Telephonic	87
IDNYC	Russian	In-Person	3
IDNYC	Russian	Telephonic	258
Infoline	Russian	Telephonic	4,815
Mayor's Office	Russian	Telephonic	1,099
MICSA	Russian	Telephonic	192
OA O	Russian	In-Person	3
OA O	Russian	Telephonic	4
OCC	Russian	Telephonic	136

OCHIA	Russian	Telephonic	11
OCSS	Russian	Telephonic	23
ODVEIS	Russian	Telephonic	183
OER	Russian	Telephonic	1
OLA	Russian	Telephonic	10
Program Account.	Russian	Telephonic	79
Reasonable Accommodation	Russian	Telephonic	14
SNAP	Russian	Telephonic	1,757
Unknown/Other	Russian	Telephonic	1,386
Cash Assist.	Samoan	Telephonic	1
CAS	Serbian	Telephonic	1
Cash Assit.	Serbian	Telephonic	2
IDNYC	Serbian	In-Person	1
Infoline	Serbian	Telephonic	6
Mayor's Office	Serbian	Telephonic	1
OAQ	Serbian	Telephonic	1
SNAP	Serbian	Telephonic	3
Unknown/Other	Serbian	Telephonic	2
Cash Assist.	Shanghainese	Telephonic	4
Infoline	Shanghainese	Telephonic	2
OCC	Shanghainese	Telephonic	1
Adult Singles	Sign Lang. (not ASL)	In-Person	2
APS	Sign Lang. (not ASL)	Video	2
Career Services	Sign Lang. (not ASL)	In-Person	2
Cash Assist.	Sign Lang. (not ASL)	In-Person	2
Cash Assist.	Sign Lang. (not ASL)	Video	2
Families (DHS)	Sign Lang. (not ASL)	In-Person	5
Families (DHS)	Sign Lang. (not ASL)	Video	4
MICSA	Sign Lang. (not ASL)	Video	1
Agency-wide	Simplified Chinese	Document Translation	478
Cash Assit.	Sinhala	Telephonic	1
Infoline	Sinhala	Telephonic	2
Unknown/Other	Sinhala	Telephonic	1
IDNYC	Slovak	In-Person	1
IDNYC	Slovak	Telephonic	2
Infoline	Slovak	Telephonic	3
SNAP	Slovak	Telephonic	1
Cash Assit.	Somali	Telephonic	1
Unknown/Other	Somali	Telephonic	1
Cash Assit.	Soninke	Telephonic	3
Fair Fares	Soninke	Telephonic	2
Families (DHS)	Soninke	Telephonic	23



Infoline	Soninke	Telephonic	8
ODVEIS	Soninke	Telephonic	1
SNAP	Soninke	Telephonic	4
Unknown/Other	Soninke	Telephonic	1
Administration	Spanish	Telephonic	217
Adult Families	Spanish	Telephonic	537
Adult Singles	Spanish	Telephonic	998
Agency-wide	Spanish	Document Translation	376
APS	Spanish	In-Person	437
APS	Spanish	Telephonic	2,889
CAS	Spanish	Telephonic	1,558
Cash Assit.	Spanish	Telephonic	30,169
EEO	Spanish	Telephonic	41
Fair Fares	Spanish	Telephonic	419
Fair Hearings	Spanish	Telephonic	218
Families (DHS)	Spanish	Telephonic	16,460
HASA	Spanish	In-Person	2
HASA	Spanish	Telephonic	6,689
HCSP	Spanish	In-Person	18
HCSP	Spanish	Telephonic	1,182
HPA	Spanish	In-Person	5
HPA	Spanish	Telephonic	2,739
IDNYC	Spanish	In-Person	1
IDNYC	Spanish	Telephonic	2,449
Infoline	Spanish	Telephonic	65,992
Mayor's Office	Spanish	Telephonic	5,335
MICSA	Spanish	In-Person	2
MICSA	Spanish	Telephonic	2,513
OAQ	Spanish	In-Person	11
OAQ	Spanish	Telephonic	181
OCC	Spanish	Telephonic	2,689
OCHIA	Spanish	Telephonic	52
OCSS	Spanish	Telephonic	1,959
ODVEIS	Spanish	Telephonic	4,293
OER	Spanish	Telephonic	4
OLA	Spanish	Telephonic	254
OLA SOI	Spanish	In-Person	2
Program Account.	Spanish	Telephonic	2,640
Reasonable Accommodation	Spanish	Telephonic	118
SNAP	Spanish	Telephonic	37,900
Streets	Spanish	Telephonic	6
Unknown/Other	Spanish	Telephonic	26,868

CAS	Swahili	Telephonic	3
Families (DHS)	Swahili	Telephonic	15
Infoline	Swahili	Telephonic	1
SNAP	Swahili	Telephonic	1
Unknown/Other	Swahili	Telephonic	4
Unknown/Other	Swedish	Telephonic	1
Adult Families	Sylheti	Telephonic	1
APS	Sylheti	Telephonic	1
Cash Assit.	Sylheti	Telephonic	14
Families (DHS)	Sylheti	Telephonic	9
HPA	Sylheti	Telephonic	1
Infoline	Sylheti	Telephonic	16
Mayor's Office	Sylheti	Telephonic	1
OCC	Sylheti	Telephonic	2
ODVEIS	Sylheti	Telephonic	1
SNAP	Sylheti	Telephonic	6
Unknown/Other	Sylheti	Telephonic	3
Adult Families	Tagalog	Telephonic	2
Adult Singles	Tagalog	Telephonic	2
APS	Tagalog	In-Person	4
CAS	Tagalog	Telephonic	1
Cash Assit.	Tagalog	Telephonic	21
HPA	Tagalog	Telephonic	1
IDNYC	Tagalog	Telephonic	1
Infoline	Tagalog	Telephonic	20
Mayor's Office	Tagalog	Telephonic	2
MICSA	Tagalog	Telephonic	2
OCC	Tagalog	Telephonic	1
SNAP	Tagalog	Telephonic	20
Unknown/Other	Tagalog	Telephonic	8
Adult Singles	Taiwanese	Telephonic	1
APS	Taiwanese	Telephonic	2
Infoline	Taiwanese	Telephonic	3
Mayor's Office	Taiwanese	Telephonic	3
SNAP	Taiwanese	Telephonic	1
Unknown/Other	Taiwanese	Telephonic	1
Mayor's Office	Tajik	Telephonic	1
Cash Assit.	Tamil	Telephonic	6
Families (DHS)	Tamil	Telephonic	1
HCSP	Tamil	Telephonic	1
IDNYC	Tamil	Telephonic	1
Infoline	Tamil	Telephonic	9

OCC	Tamil	Telephonic	1
Program Account.	Tamil	Telephonic	2
Unknown/Other	Tamil	Telephonic	6
IDNYC	Telugu	In-Person	1
IDNYC	Telugu	Telephonic	1
Infoline	Telugu	Telephonic	1
ODVEIS	Telugu	Telephonic	1
Unknown/Other	Telugu	Telephonic	2
APS	Thai	Telephonic	1
CAS	Thai	Telephonic	1
Cash Assit.	Thai	Telephonic	8
Families (DHS)	Thai	Telephonic	2
HPA	Thai	Telephonic	1
IDNYC	Thai	In-Person	1
IDNYC	Thai	Telephonic	7
Infoline	Thai	Telephonic	7
Mayor's Office	Thai	Telephonic	4
MICSA	Thai	Telephonic	1
Reasonable Accommodation	Thai	Telephonic	1
SNAP	Thai	Telephonic	8
Unknown/Other	Thai	Telephonic	9
Adult Singles	Tibetan	Telephonic	20
Cash Assit.	Tibetan	Telephonic	10
Families (DHS)	Tibetan	Telephonic	38
HPA	Tibetan	Telephonic	4
Infoline	Tibetan	Telephonic	13
Mayor's Office	Tibetan	Telephonic	2
OCC	Tibetan	Telephonic	1
ODVEIS	Tibetan	Telephonic	2
SNAP	Tibetan	Telephonic	7
Unknown/Other	Tibetan	Telephonic	62
Adult Singles	Tigrinya	Telephonic	14
Infoline	Tigrinya	Telephonic	1
SNAP	Tigrinya	Telephonic	4
Adult Singles	Toishanese	Telephonic	5
APS	Toishanese	Telephonic	8
CAS	Toishanese	Telephonic	1
Cash Assit.	Toishanese	Telephonic	9
Fair Fares	Toishanese	Telephonic	1
IDNYC	Toishanese	Telephonic	2
Infoline	Toishanese	Telephonic	53
Mayor's Office	Toishanese	Telephonic	12

MICSA	Toishanese	Telephonic	7
OCC	Toishanese	Telephonic	2
ODVEIS	Toishanese	Telephonic	4
Program Account.	Toishanese	Telephonic	3
SNAP	Toishanese	Telephonic	14
Unknown/Other	Toishanese	Telephonic	12
Agency-wide	Traditional Chinese	Document Translation	530
Adult Singles	Turkish	Telephonic	3
APS	Turkish	In-Person	1
APS	Turkish	Telephonic	1
CAS	Turkish	Telephonic	8
Cash Assit.	Turkish	Telephonic	32
HASA	Turkish	Telephonic	2
IDNYC	Turkish	In-Person	1
IDNYC	Turkish	Telephonic	7
Infoline	Turkish	Telephonic	31
Mayor's Office	Turkish	Telephonic	6
OAD	Turkish	Telephonic	1
OCC	Turkish	Telephonic	2
ODVEIS	Turkish	Telephonic	1
SNAP	Turkish	Telephonic	18
Unknown/Other	Turkish	Telephonic	24
Adult Families	Ukrainian	Telephonic	1
Adult Singles	Ukrainian	Telephonic	2
APS	Ukrainian	Telephonic	3
CAS	Ukrainian	Telephonic	5
Cash Assit.	Ukrainian	Telephonic	1
HASA	Ukrainian	Telephonic	4
IDNYC	Ukrainian	Telephonic	4
Infoline	Ukrainian	Telephonic	3
Mayor's Office	Ukrainian	Telephonic	1
MICSA	Ukrainian	Telephonic	1
Reasonable Accommodation	Ukrainian	Telephonic	1
SNAP	Ukrainian	Telephonic	1
Unknown/Other	Ukrainian	Telephonic	4
Adult Singles	Urdu	Telephonic	3
Agency-wide	Urdu	Document Translation	444
APS	Urdu	Telephonic	3
CAS	Urdu	Telephonic	30
Cash Assit.	Urdu	Telephonic	179
Fair Fares	Urdu	Telephonic	1
Families (DHS)	Urdu	Telephonic	29

HCSP	Urdu	Telephonic	4
HPA	Urdu	Telephonic	18
IDNYC	Urdu	Telephonic	7
Infoline	Urdu	Telephonic	183
Mayor's Office	Urdu	Telephonic	20
MICSA	Urdu	Telephonic	23
OAQ	Urdu	Telephonic	1
OCC	Urdu	Telephonic	10
OCSS	Urdu	Telephonic	5
ODVEIS	Urdu	Telephonic	9
OLA	Urdu	Telephonic	1
Program Account.	Urdu	Telephonic	7
SNAP	Urdu	Telephonic	159
Unknown/Other	Urdu	Telephonic	85
Adult Singles	Uzbek	Telephonic	2
Cash Assit.	Uzbek	Telephonic	22
Families (DHS)	Uzbek	Telephonic	97
HPA	Uzbek	Telephonic	3
IDNYC	Uzbek	Telephonic	1
Infoline	Uzbek	Telephonic	48
Mayor's Office	Uzbek	Telephonic	5
MICSA	Uzbek	Telephonic	3
OCSS	Uzbek	Telephonic	3
ODVEIS	Uzbek	Telephonic	5
SNAP	Uzbek	Telephonic	86
Unknown/Other	Uzbek	Telephonic	14
APS	Vietnamese	Telephonic	6
CAS	Vietnamese	Telephonic	4
Cash Assit.	Vietnamese	Telephonic	26
Fair Fares	Vietnamese	Telephonic	1
Families (DHS)	Vietnamese	Telephonic	1
HPA	Vietnamese	Telephonic	13
IDNYC	Vietnamese	Telephonic	3
Infoline	Vietnamese	Telephonic	27
Mayor's Office	Vietnamese	Telephonic	19
MICSA	Vietnamese	Telephonic	5
OCC	Vietnamese	Telephonic	1
OCSS	Vietnamese	Telephonic	3
Program Account.	Vietnamese	Telephonic	1
SNAP	Vietnamese	Telephonic	30
Unknown/Other	Vietnamese	Telephonic	20
Cash Assit.	Wolof	Telephonic	12

Families (DHS)	Wolof	Telephonic	8
IDNYC	Wolof	Telephonic	1
Infoline	Wolof	Telephonic	5
Mayor's Office	Wolof	Telephonic	1
OA0	Wolof	Telephonic	1
OCC	Wolof	Telephonic	1
SNAP	Wolof	Telephonic	3
Unknown/Other	Wolof	Telephonic	8
CAS	Yiddish	Telephonic	1
Cash Assit.	Yiddish	Telephonic	1
HCSP	Yiddish	Telephonic	1
Mayor's Office	Yiddish	Telephonic	1
SNAP	Yiddish	Telephonic	2
Unknown/Other	Yiddish	Telephonic	1
CAS	Yoruba	Telephonic	1
Cash Assit.	Yoruba	Telephonic	3
Families (DHS)	Yoruba	Telephonic	3
HPA	Yoruba	Telephonic	1
IDNYC	Yoruba	Telephonic	2
Infoline	Yoruba	Telephonic	1
Mayor's Office	Yoruba	Telephonic	1
ODVEIS	Yoruba	Telephonic	2
Program Account.	Yoruba	Telephonic	1
SNAP	Yoruba	Telephonic	2

# New York City Department of Veterans' Services May 2021



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## I. Agency Name and Agency Language Access Coordinator

**Agency Name:** The New York City Department of Veterans' Services

**Agency Language Access Coordinator:** Allen Houston, Press Secretary

## II. Agency Mission and Background

The New York City Department of Veterans' Services (DVS) was created in April 2016, making DVS the first standalone City agency in the country dedicated to serving Veterans and their families.

Since that time, the agency has moved rapidly to connect, mobilize, and empower New York City's Veteran community in order to foster purpose-driven lives for New York City Service Members – past and present – in addition to their caregivers, survivors, and families through:

- Community engagement, amplifying life strategies for successful transition and renewed service.
- Targeted advocacy, championing legislative and policy actions at the local, states, and national level.
- Compassionate service, ensuring coordinated access to benefits, services, and resources.

We believe that veterans are civic assets whose strength and demonstrated commitment to public service will help NYC thrive. DVS seeks to achieve its mission through the following Lines of Action:

1. **Housing & Support Services.** DVS works with partners to leverage and expand resources needed to provide subsidized housing and create innovative systems to help veterans navigate the NYC rental market. This includes:
  - Veteran Peer Coordinator (VPC) program: DVS staff as one-on-one advocates for each homeless veteran navigating their housing search.
  - After Care: ensuring recently housed veterans and their landlords get support for successful transition in housing.
  - Housing Coordination Center: a one-stop housing placement service to affordable housing owners and property managers.
2. **VA Claims.** Over 6,500 Veterans living in New York City are eligible for but do not receive their Veteran Affairs benefits. To alleviate this issue and get these Veterans the benefits they earned, DVS launched a four-person Veteran Affairs Claims team on July 5th. The VA Claims team can assist and file a claim on behalf of eligible Veterans seeking an earned benefit such as education, survivorship, or disability.
3. **Food Outreach.** DVS is working to ensure vulnerable Veterans are getting food during the

pandemic. Through food distribution efforts in the Bronx and Brooklyn it packs thousands of meals for Veterans. This is only one component of its efforts to feed food-insecure Veterans.

4. **Employment, Entrepreneurship, Education, Engagement & Events.** DVS is dedicated to helping veterans broaden their employment opportunities to find fulfilling and sustainable jobs or create their own business, help veterans as they work to further their education, engage them with no matter their discharge status, and attend and host events to meet with as many members of the community as possible.

To address this, DVS has launched satellite offices, expanding our physical office presence throughout the city, enabling veterans and their families to meet one-on-one with VA-credentialed Outreach Specialists in each of the five boroughs. DVS has satellite offices in all five boroughs: Brooklyn, the Bronx, Manhattan, Queens, and Staten Island. Veterans and their families can now get one-on-one assistance in their home communities.

### III. Agency Language Access Policy and Goals

DVS's Language Access Goal is to deliver information for a multilingual audience.

Our agency plans to:

- A. Provide language access services in designated citywide languages
- B. Develop and implement a language access implementation plan
- C. Provide as-needed telephonic interpretation services in at least 100 languages
- D. Update the language access implementation plan at least every three years and publish it on our website.

### IV. Agency Language Access Accomplishments and Progress on Goals from Previous LAIP

- DVS translated its Veteran Resource Guide into the ten city languages and is now updating that to include new services that have been added in the last two years. DVS will work with a translator service on that update.
- DVS has placed right to translation cards at the front entrance when people enter our offices.

## V. LEP Population Assessment

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

### Factor 1: The Number or Proportion of LEP Persons in the Eligible Service Population

LANGUAGE SPOKEN AT HOME				
Population 5 years and over	7,863,680	+/-717	7,863,680	(X)
English only	4,044,156	+/-33,888	51.40%	+/-0.4
Language other than English	3,819,524	+/-33,944	48.60%	+/-0.4
Speak English less than “very well”	1,761,502	+/-24,900	22.40%	+/-0.3
Spanish	1,879,960	+/-18,066	23.90%	+/-0.2
Speak English less than “very well”	854,727	+/-16,938	10.90%	+/-0.2
Other Indo-European languages	1,010,333	+/-26,253	12.80%	+/-0.3
Speak English less than “very well”	414,650	+/-16,578	5.30%	+/-0.2
Asian and Pacific Islander languages	695,232	+/-12,681	8.80%	+/-0.2
Speak English less than “very well”	424,403	+/-11,530	5.40%	+/-0.1
Other languages	233,999	+/-14,864	3.00%	+/-0.2
Speak English less than “very well”	67,722	+/-5,896	0.90%	+/-0.1

Figure 1 Population 5 Years & Over with Limited English Proficiency by NTA NYC 2013-2018 (NYC Department of City Planning)

In Figure 1, there are 1,761,502 New York City residents who speak English less than “Very Well.” While each one of these residents is a potential DVS constituent, our agency’s core demographic is veterans, service members, and their families. Figure 2 breaks down our consistency based on different attributes.

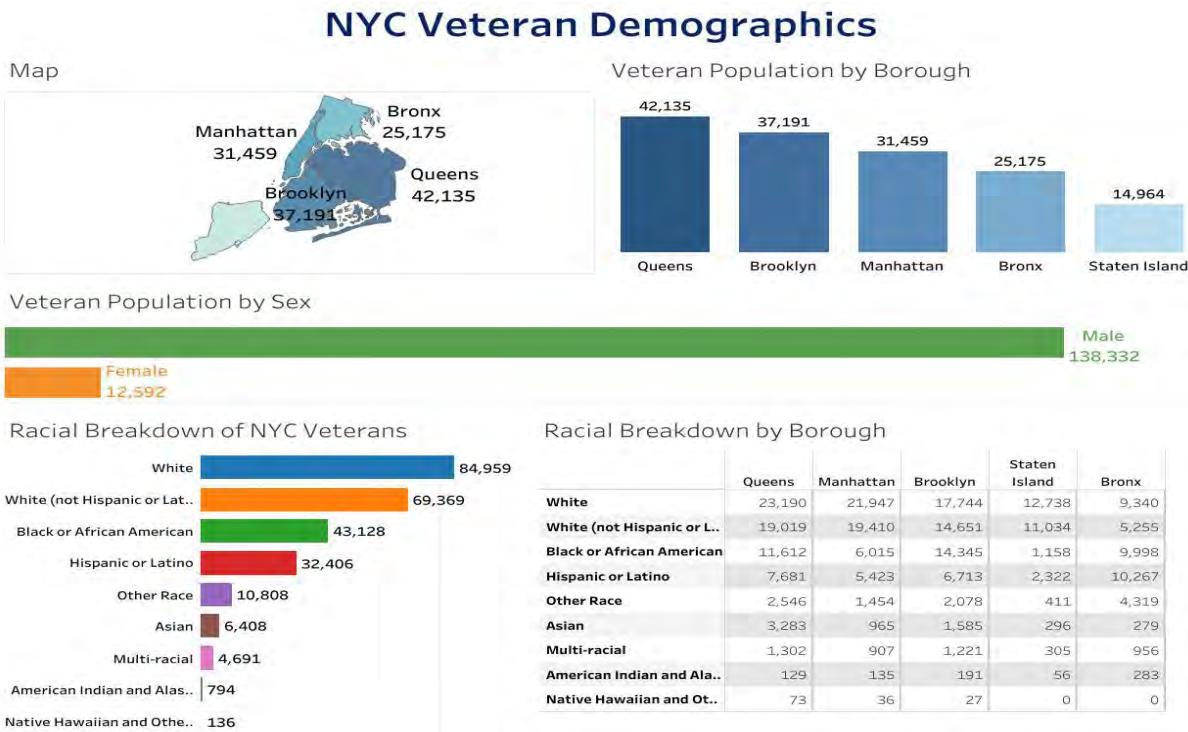


Figure 2 Proportion of NYC Veterans (NYC Department of Veterans' Services)

According to U.S. Census (2015-2019 American Community Survey 5-Year Estimates), there are 150,924 veterans in New York City. However, DVS uses a comprehensive approach to count its eligible service population. As of 2017, DVS considers roughly 210,000 New York City veterans as its core constituency. We serve Veterans, regardless of discharge status or length

of service, active duty, National Guard, Reserves, and their families.

Reputable sources that enumerate the number or proportion of LEP persons in the agency's eligible service population are limited. As a new agency we have yet to compile comprehensive data sets that capture the number and proportion of LEP persons in the eligible service population.

For military enlistment purposes, the United States includes Guam, Puerto Rico, the U.S. Virgin Islands, the Northern Mariana Islands, American Samoa, the Federated States of Micronesia, the Marshall Islands and Palau - areas where English is the commonly used language. The U.S. Census (2009-2013) estimated the percentage of "population 5 years and over" that "speak[s] English less than 'Very Well'" to be 9%. Furthermore, all service branches require applicants to speak, read, and write English fluently. Therefore, an overwhelming majority of DVS's service population is proficient in English—which has borne out that DVS received zero requests for translation services in 2020.

DVS also serves family members who might not be as proficient in English. As of March 2021, we do not have the data that delineates family members of veterans or that of service members who might be LEP persons in the eligible service population. While we do not have enough data to capture the number of LEP individuals, DVS can confidently extrapolate the number to be exceptionally low. Moreover, DVS staff are advised to reach out to their managers should an LEP need arise. That has not happened to date.

#### **Factor 2: The Frequency with which LEP Individuals Come into Contact with The Agency**

There is not enough data to distinguish LEP individuals in the eligible service population because the frequency with which LEP individuals meet with DVS is exceptionally low. Yet, DVS continues to meet and/or exceed its language access goals while interacting with the eligible service population.

Currently, DVS does not track constituents' family members who might be LEP individuals. At this stage, the agency is unable to accurately evaluate the number of this potential LEP segment. Since its establishment, the agency has not received any language service requests or complaints.

#### **Factor 3: The Importance of the Benefit, Service, Information, Or Encounter to The Limited English Proficient Person**

DVS recognizes the importance of the benefits, services, information, and encounters to the limited English proficient person. The agency also considers the consequences of the lack of language services or inadequate interpretation or translation on the eligible service population. DVS continuously strives to serve every member in its eligible service population regardless of language proficiency with the resources it has.

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

DVS has access to internal and external language resources. Internally, an assessment will be conducted to leverage any in-house language proficiencies. However, bilingual staff will be used primarily to communicate one-on-one with LEP clients and review already translated materials for quality and accuracy.

Externally, DVS would use NYC DCAS’s contracting services to meet its language access requirements. The Language Access Coordinator will also work with each section to determine the agency’s language access capacity through staffing and contracted services.

Since its establishment in 2021, DVS has incurred the following costs:

Type of Service	Vendor	Instances	Costs
Telephonic Interpretation		0	\$0.00
On-Site Interpretation (excluding sign language)	N/A	0	\$0.00
Sign Language Interpretation	N/A	0	\$0.00
Written Translation	N/A	0	\$0.00
Bilingual Skills Testing	N/A	0	\$0.00
Total			\$0.00

As DVS works through the process of finalizing FY21 financial plans, language services will be considered as an ongoing component of the agency’s budget.

Based on the “four-factor analysis” and current agency data, DVS determined that at this point, translating documents beyond the designated ten languages is not necessary. Nevertheless, DVS will remain attentive to changes to language service requests/complaints and will adjust to its constituents’ needs and staff performance.

## VI. Provision of Language Access Services

DVS will provide language access services in the designated citywide languages.

### Translation Services

The Language Access Coordinator (LAC) will identify the most commonly distributed documents to the public. Documents that contain important information regarding the provision of “basic city services,” and focus on what constituents must know will be revised following plain language guidelines before translation.

While DVS does not provide “basic city services” to its constituents, the agency will incorporate plain language guidelines in the development and maintenance of important documents. DVS will also have multi-language signs that indicate the availability of free language services.

The NYC Department of Veterans’ Services will update its Emergency Preparedness Plan to ensure that customers who are limited English proficient are able to access language services in the case of an emergency.

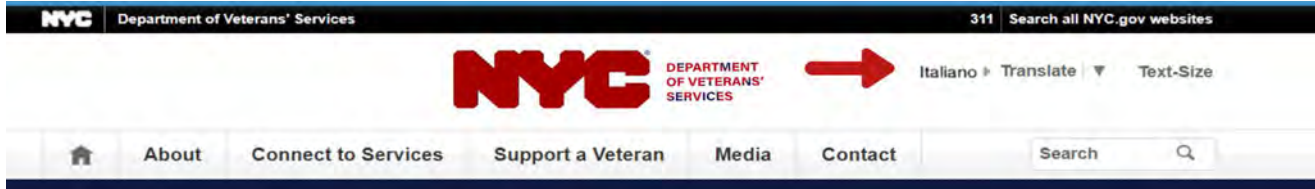
Following the Plain Writing Act of 2010, DVS will review and revise previously generated documents as well provide plain language trainings or protocols that ensure that materials are reviewed for plain language. The agency will ensure newly developed documents enable constituents to:

- A. find what they need,
- B. understand what they find

C. use what they find to meet their needs

For other agency communications like digital communications/media and website, DVS will employ the following resources:

- **Website:** the standard “Google Translate” widget (shown below) and drop-down menu translates DVS’s webpage to multiple language. DVS will also find new ways to make its website more accessible in terms of translating key content, ensuring translated materials are posted, improving access and navigation to the translated materials



- **Social Media:** each platform has its own way of translating posts in a language that is different than the default user profile. Generally, the user would see a visual cue to solicit an action or indicate that translation has automatically occurred.

DVS recognizes that the accuracy of these tools is not on par with the level of a contracted vendor. Yet, this solution is the best given the ephemeral nature of social media posts.

- **In-Person Interpretation:** DVS intends to provide interpretation services where it is deemed necessary and fiscally responsible to facilitate interaction with the service population. When an LEP constituent visits the agency’s main office, a language identification flashcard or “I speak...” cards (example below) will be help frontline staff to determine the LEP’s preferred language. Most of these cards are designed to have more than 20 languages.

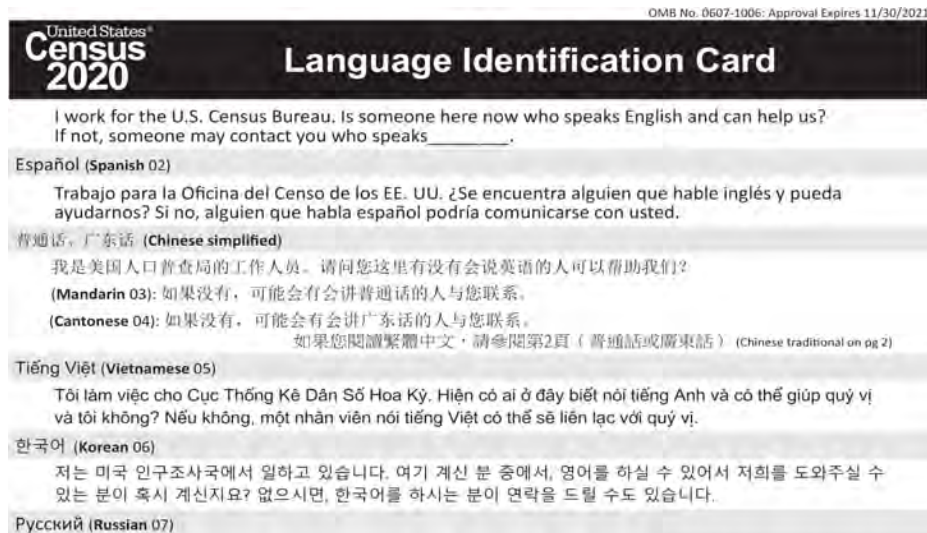


Figure 3 U.S. Census Language Identification Flashcard (U.S. Department of Commerce)

DVS will provide free interpretation in the ten designated citywide languages as required by LL30 as a part of other agency communication, including public events. The agency will develop policies to incorporate requests for interpretation in the planning of public events. Additionally, The Language Access Coordinator will work with staff, clients, and vendors to ensure interpretation services quality.

- **Telephonic Interpretation:** DVS also interacts with clients over the phone. The agency will seek to provide telephonic interpretation in at least 100 languages by contracting with a vendor at the appropriate time. If a staff member is unable to identify the LEP's spoken language, customer service from a contracted vendor would be able to assist. Necessary policies and procedures will be developed to enable staff to identify the language and effectively deliver information to clients.
- **Notification of Free Interpretation Signage:** DVS will post multilingual signage regarding the provision of free interpretation services. These visual cues will be posted at the main office, borough centers, and during public events. DVS will design its own signage or outsource a design like other city agencies.

Free interpretation signage in combination with language identification/I Speak...cards provide a comprehensive method for LEPs to communicate with staff. If an individual indicates a need for assistance, staff will identify an onsite employee that speaks the client's language. If this option is not available, staff would use the language line telephone interpretation service.

- **Emergency Preparedness Plan:** The NYC Department of Veterans' Services will update its Emergency Preparedness plan to ensure that customers who are limited English proficient are able to access language services during an emergency.

This plan includes ensuring that documents are translated and signage in public locations is conspicuous, appropriate multilingual signage and LEP identification tools are available at emergency sites, interpreters can be contacted and utilized, and other translation resources and vendors are available in the event of an emergency.

## VII. Training

The Language Access Coordinator (LAC) will implement and conduct a language access training program for current staff and new employees. The program will train staff on language access policies and procedures and how to incorporate plain language design strategies.

DVS will train frontline workers and managers. Based on the agency's mission, the following teams would be frontloaded: field coordinators, front-desk, and housing and communication. The LAC would work with the heads of each line to implement a "train-the-trainer" model to ensure existing and new staff are fully trained.

The LAC will also maintain a database of trained staff and training frequency for compliance and other pertinent purposes. Coupled with other data, this information will also be used to improve the performance of DVS services and response to language requests and complaints.

Although the training plan will be tailored to DVS's size and recent establishment, it will consider the following topics (NYC MOIA guidelines):

- The rationale for language access, city demographics, and DVS's language access policies, resources, and standard procedures.
- Identifying customer's primary language; reporting requests for language services; use of dual handsets; and the use of telephonic interpreters; and
- Plain language, cultural competency, and disability communications.

The LAC will work with DVS managers to have systems in place to appropriately monitor progress of LL30 requirements (number of staff trained on language services, the number of commonly distributed documents identified and translated, etc).

## VIII. Record Keeping and Evaluation

The Language Access Coordinator (LAC) will work with each section to add language pertinent data entry points to sign-in sheets, intake forms, CRM inputs, and from the agency's interactions with the service population. The LAC will ensure data gathered from multiple sources is properly tracked, maintained, and reviewed to identify any additional language needs and to ameliorate the agency services.

The collected data will be used to monitor the efficacy of DVS's language implementation plan and compliance with Local Law 30. The LAC will be responsible for reviewing records and making any necessary adjustment on annual basis. The data collection and management will also ensure compliance with other record-keeping laws and regulations.

The agency plans to ensure the quality of translation and interpretation services by using only verified vendors from NYC DCAS Citywide Contracts for Language Services. Furthermore, DVS plans to leverage internal language proficiencies to verify the quality and accuracy of language services (interpretation and translation).

## IX. Resource Analysis and Planning

Currently, DVS does not have the capacity to provide comprehensive language access. Nonetheless, the agency is working to integrate language access requirements in the upcoming budget and will continue to reassess agency services with the goal of procuring language translation services if needed upon request. In the interim, DVS plans to follow through with its language access implementation plan.

DVS has access to city resources and bilingual staff. The agency plans to use language proficient staff and will work with other city agencies contract any necessary services. The recent establishment of DVS enables agency to easily identify gaps in language access. Furthermore, DVS's small size and exceptionally low number of LEP in the service population enables the agency to closely monitor and improve the quality of language assistance services.



## X. Outreach and Public Awareness of Language Access Services

DVS hosts many outreach and community events. Since its inception, the agency has been able to connect with and communicate its services to the target audience. The agency hopes to increase language services at future events.

Once DVS establishes a capacity to provide comprehensive language access services and to create public awareness of the availability of these services, the agency will use the following strategies and outreach activities:

- Social Media and online (Twitter, Facebook, Instagram, Medium, YouTube, and DVS’s website)
- Depending the platform, a campaign would be launched to advertise the availability of language access services
- Media, flyers, event announcements, and other posted activities will have relevant info about the availability of free interpretation services.

## XI. Language Access Complaints

DVS’s Language Access Coordinator (LAC) will be the point of contact for all language access complaints, questions, and requests. The eligible service population is encouraged to bring to DVS’s attention any language-related issues using all means of communication. Common sources include 311, the “Contact Us” page of DVS’s website, social media, and walk-ins.

The LAC would ensure record-keeping related to language access questions, requests, and complaints. The data would be used to review DVS’s performance and address any areas of improvements.

Staff at the backend of each interaction (online, phone, and in-person) would triage language access complaints, questions, and requests and forward them to the LAC. The LAC handles receiving, tracking, and resolving complaints.

The table below is an example of how DVS plans to include information on complaints as part of annual agency reporting.

How members of the public can submit language access complaints, questions, and requests	Agency 311 Data (CY 2020)	complaints/requests were addressed
Online form on our official webpage under “Contact.”  Email:	# of language access complaints received via 311: 0	Not applicable

<p><a href="mailto:Connect@veterans.nyc.gov">Connect@veterans.nyc.gov</a>  <a href="mailto:press@veterans.nyc.gov">press@veterans.nyc.gov</a></p> <p>Call:  311  212-416-5250</p> <p>In person  1 Centre Street  22nd Floor, Suite 2208  New York, NY 10007</p>	<p># of requests for language access resources via 311: 0</p>	<p>Not applicable</p>
<p>Tweet or Direct Message  <a href="https://twitter.com/nycveterans">@nycveterans</a></p> <p>Comment or Send Message  <a href="https://twitter.com/nycveterans">@nycveterans</a></p>		

\*The table has hyperlinks to our online form, email address, Twitter handle, and Facebook page.

## XII. Implementation Plan Logistics

- A. Submit finalized LAIP to the Mayor’s Office of Immigration Affairs
  - B. Update existing language access training materials
  - C. Train DVS staff on LL 30 and other relevant language access protocol and best practices to better serve the Veteran community
  - D. Programs and Budget: Routinely assess the frequency with which DVS receives requests for LEP/LEP-related services, and evaluate agency resources to enhance LEP as necessary
- Maintain a productive, working relationship with other agencies to gather insights and best practices on LEP services.

Given DVS's recent establishment and small size of 39 active employees, the table above presents a reasonable timeline that addresses the requirements of LAIP under LL30. Over the next year, the agency's focus will be on establishing language access policies/procedures, tracking language service requests and complaints, maintaining records, analyzing gathered data, and reporting. While LL30 calls for an updated language access plan every three years, DVS will periodically review its plan and, when necessary, consider impactful changes.



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**Language Access Implementation Plan  
2021**

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

<b>Agency name</b>	<b>NYC Department of Youth and Community Development</b>
<b>Name of the agency’s Language Access Coordinator (LAC) and all office titles held by this individual.</b>	<b>Andrew Miller, Senior Director, Intergovernmental Affairs and Executive Communications, EEO Counselor and Language Access Coordinator</b>
<b>Link to the agency’s Language Access Implementation Plan (LAIP) posted on the agency’s website.</b>	<a href="https://www1.nyc.gov/site/dycd/about/news-and-media/reports-plans.page">https://www1.nyc.gov/site/dycd/about/news-and-media/reports-plans.page</a>

**II. Agency mission and background**

The New York City Department of Youth and Community Development (DYCD) invests in a network of community-based organizations and programs to alleviate the effects of poverty and to provide opportunities for all New Yorkers and communities to flourish. DYCD supports New York City youth and their families by funding a wide range of high-quality youth and community development programs. DYCD funds a wide range of innovative, practical and quality programs that positively impact youth and communities, including:

- Immigrant services programs assist participants with accessing government benefits; application assistance (including assistance with matters relating to citizenship and immigration status); employment; healthcare; social services; and civics classes in preparation for citizenship.
- Afterschool programs, including the nationally known Beacon programs; COMPASS, the largest municipally funded afterschool initiative in the country; and the Cornerstone Initiative in public housing developments
- Youth workforce development programs including the Summer Youth Employment Program (SYEP), Train & Earn, Intern & Earn, Learn & Earn, and Work, Learn & Grow
- Runaway and homeless/LGBTQ youth outreach, drop in centers, and shelters
- Family support services, including the Fatherhood Initiative
- Literacy programs
- Technical assistance and capacity building for community-based organizations

DYCD is committed to building and expanding on partnerships that generate innovative and practical programs for youth, their families, and communities.

To ensure that all New Yorkers are aware of these services DYCD directly administers Community Connect to provide information and assistance to callers in over 180 languages. Additionally, discoverDYCD allows users to search in multiple languages for DYCD-funded programs, by borough, neighborhood or zip code, and provides contact information, activities offered, and a mapping feature with navigation.

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

DYCD's overarching goal for language access is to provide equal access of LEP individuals into DYCD's array of services. This is accomplished by ensuring that they can locate services in their primary language on-line with the agency's website and DiscoverDYCD and by calling Community Connect where live interpretation services are provided.

DYCD's language access goal will be met through the following objective:

- Providing live interpretation services to LEP callers to **Community Connect** (formerly Youth Connect), a resource and referral service for communities and families of New York City. Community Connect aims to increase awareness of opportunities and services available to New Yorkers. When you contact our toll-free hotline, you are connected with an Engagement Specialist that not only provides top-notch customer service but provides the public with the most updated information. We are a one-stop shop resource for all ages. DYCD Community Connect is the connective thread of the agency which provides information and assistance to callers in over 180 languages.
- Free Interpretation services at DYCD offices. While most visitors to DYCD's two office locations, 123 William Street and 2 Lafayette are representatives of community-based organizations funded by the agency, the availability of interpretation services is available to all visitors. Upon entry, visitors are greeted by agency receptionists and who with the assistance of a sign advertising free interpretation services in many different languages, connects the visitor to Language Line, which provides on-demand interpretation services with their over 14,000 professionally-trained interpreters are fluent in more than 240 languages.
- Ensuring that resource information on the DYCD website can be translated into the required languages.
  - Ensuring universal enrollment form and other commonly used forms are available in the 10 designated languages
  - Translating commonly distributed documents in the 10 designated Citywide languages
  - Ensuring that "plain language" is used whenever possible
  - Translating community needs assessment forms in 10 designated Citywide languages
  - Ensuring DYCD staff and the public are aware of DYCD's Language Access policies so that that the public can access Community Connect, DiscoverDYCD and the agency's website.

New Yorkers are made aware of DYCD's services through its website (<https://www1.nyc.gov/site/dycd/index.page>), the discoverDYCD portal (<http://www.dycdportal.nyc/discoverdycd/home>) and Youth Connect (1-800-246-4646 or 646-343-6800).

#### IV. Agency Language Access Accomplishments and Progress Goals from the Previous LAIP Accomplishments:

DYCD is proud of its efforts to ensure that every New Yorker can access DYCD’s services. We are constantly striving to make it simpler to find programs in communities across the city. With COVID-19 and the City’s worst economic crisis in 45 years, this was a year unlike any other. Going on PAUSE due to the pandemic meant meeting our core responsibilities while teleworking. DYCD’s IT team quickly had the agency up and running remotely including Community Connect. This helped ensure that LEP New Yorkers can get the most up-to-date information on programming. DYCD is committed to ensuring that all New Yorkers are able to learn about and enjoy services available to them.

<u>Language Access Goals</u>	<u>Update</u>
Identify a Language Access Coordinator	DYCD’s Senior Director of Intergovernmental Affairs serves as the Language Access Coordinator.
Providing interpretation services to LEP callers to Youth Connect to access services and ask questions to Youth Connect Resource Specialists	Community Connect has remained operational and available to the general public and is available to provide live interpretation services in over 240 languages through Language Line.
Ensure that resource information on the DYCD website can be translated into the required languages	Includes translation into all 10 required languages plus many others for over 180 language options. It provides information to young people, parents and community-based organizations about DYCD-funded services and how to access funding opportunities. DYCD launched discoverDYCD, a web platform that enables the public to search for and apply to DYCD Programs throughout New York City. After finding a program of interest, prospective applicants can choose to create a discoverDYCD account to apply to programs directly. Completing one online application enables an applicant to apply to multiple DYCD Programs. Like the agency website it is available in over 180 languages.
Ensure universal enrollment form is available in the 10 designated languages	Completed and is available through DYCD funded providers and on-line.
Translating commonly distributed documents in the 10 designated Citywide languages	DYCD is constantly reviewing its most commonly distributed forms and translates them in the 10 designated languages plus Yiddish.
Ensuring that “plain language” is used whenever possible	The Language Access Coordinator and the Press Officer have attended a Plain Language presentation conducted by Language Line. These individuals review agency correspondence and materials.

Translating community needs assessment forms in 10 designated Citywide languages	Completed and used in recent NDA needs assessment in 41 communities across the city.
Ensuring DYCD staff and the public are aware of DYCD's Language Access policies	Plan is posted on the agency website and shared with agency personnel.

**V. LEP Population Assessment (Application of the US Department of Justice Four Factor Analysis)**

The United States Department of Justice states that agencies “should apply a four-factor test to decide what steps to take to provide meaningful access to their programs and activities to their programs and activities for LEP persons.”

The four factors include:

1. The number or proportion of LEP persons served or encountered in the eligible service area. According to U.S. Census Bureau, New York City residents who speak English less than “very well” are most likely to speak: Spanish, Chinese, Russian, French Creole, or Yiddish:

Spanish or Spanish Creole	888,764
Chinese	319,622
Russian	114,804
French Creole	48,698
Korean	46,226
Yiddish	28,698
Italian	27,803
Arabic	26,695
Polish	26,465
French	22,841
All others	306,477

2. The frequency with which LEP individuals come in contact with the program

The New York City Department of Education, over 42% of students enrolled in New York City public schools communicated in a language other than English at home. This information is helpful to DYCD as many participants in our services are public school students and attend programs located in DOE buildings.

NYC DOE Home Languages	
English	57.3%
Spanish	23.39%
Chinese	6.84%
Bengali	2.35%
Arabic	1.79%
Other	8.33%

To better assess the frequency of participants in DYCD funded programs the Universal Application which is available in all required languages. Form asks three specific Language Access questions to help DYCD identify Language Access needs of participants and communities. DYCD will share this data in future reports.

- How well does the applicant speak English? (Select One):  Fluent/Very well  Well  Not well  Not well at all
- Applicant's Primary Language (Select One):  English  Albanian  Arabic  Bengali  Chinese\*  French  Fulani  German  Gujarati  Haitian Creole  Hebrew  Hindi  Hungarian  Italian  Japanese  Korean  Kru, Ibo, or Yoruba  Mande  Punjabi  Persian  Polish  Portuguese  Romanian  Russian  Spanish  Tagalog  Turkish  Urdu  Vietnamese  Yiddish  Other:

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\*including Cantonese and Mandarin

- Other Languages Spoken by Applicant (Select all that Apply):  English  Albanian  Arabic  Bengali  Chinese\*  French  Fulani  German  Gujarati  Haitian Creole  Hebrew  Hindi  Hungarian  Italian  Japanese  Korean  Kru, Ibo, or Yoruba  Mande  Punjabi  Persian  Polish  Portuguese  Romanian  Russian  Spanish  Tagalog  Turkish  Urdu  Vietnamese  Yiddish  Other: \_\_\_\_\_
  - Not applicable (only one language spoken by applicant)
- \*including Cantonese and Mandarin

Additionally, In 2016, DYCD introduced a robust Community Needs Assessment (CNA) to hear directly from New Yorkers and document their views on what is needed to improve the well-being of their own communities. The findings demonstrated that programs and services in the categories of education, employment/career advancement, and basic needs are the top priorities, and these just happen to be the resources that would especially benefit low-income New Yorkers. The City has invested tremendous resources to begin to address these priorities, including expanding DYCD services and programs.

DYCD expanded on previous needs assessment efforts by introducing:

- Multiple surveys that combine common questions regarding service needs and gaps along with questions tailored to specific stakeholder groups: adults, employers, faith-based leaders, public school principals, program directors, CSBG-funded program participants, and key informants (elected officials and Community Board leaders).
- Use of newly released publications and studies to identify the causes and conditions of poverty in New York
- Adult Survey was translated in the required 10 languages and Yiddish. It included questions about the languages spoken at home. It revealed that in addition to the required languages, New Yorkers spoke other languages at home. The NDA reports can be found at



[www1.nyc.gov/site/dycd/involved/boards-and-councils/CNA.page](http://www1.nyc.gov/site/dycd/involved/boards-and-councils/CNA.page). In addition to paper distribution, DYCD developed a series of web-based survey platforms.

- These findings helped shape Request for Proposals issued by DYCD in 2021 in an array of programs including Immigrant Services, ESOL, Adult Literacy, Senior Services, High School Educational Support, Healthy Families and Economic Development. The upcoming NDA programs will target low-income communities and provide strategies that address the needs of older youth, seniors, the working poor, immigrants, and struggling families through education and employment services, literacy services, and assistance to individuals and families in accessing community and social services. Programs will also promote community development through addressing safety and crime issues and supporting business development.
3. The nature and importance of the program, activity, or service provided by the program: The New York City Department of Youth and Community Development (DYCD) invests in a network of community-based organizations and programs to alleviate the effects of poverty and to provide opportunities for New Yorkers and communities to flourish. DYCD strives to improve the quality of life of New Yorkers by collaborating with local organizations and investing in the talents and assets of our communities to help them develop, grow and thrive. To be able to access services all New Yorkers, including LEP, must be able to easily locate programs in their community with a smart device or on the telephone.
  4. The resources available to the Department, and costs associated with different language service options: DYCD has a contract with Language Line to translate documents and provide telephonic interpretation for Community Connect callers and visitors to DYCD offices. The Language Access Coordinator works with multiple units to facilitate the translation of documents. Should the translations need corrections, they are returned to the vendor for corrections. The LAC works with the Press office and unit heads to identify the most commonly distributed documents to have them translated in plain language. Staff are made aware of the agency's translation resources at various management meetings.
  5. Evaluation of Service Population LAS Needs: DYCD regularly reviews data provided by the Department of Education, the U.S. Census Bureau, the Community Needs Assessment and data relating to DYCD enrollment to evaluate the LAS needs of the service population, or likely service population to determine which languages should be provided supplemental to designated citywide languages.

## **VI. Provision of Language Access Services**

DYCD is committed to ensuring that all New Yorkers are able to learn about and enjoy services available to them. DYCD's overarching goal for language access is to allow access and utilization by LEP individuals into DYCD's array of services. DYCD services are provided through contracts through non-profit providers who are selected through a competitive process. Cultural competency and understanding of the needs of specific neighborhoods, including languages spoken by the communities they serve plays an important role in this process.

DYCD directly administer its website, an on-line application called discoverDYCD and Community Connect, a toll-free confidential hotline. All of these services offer translation or interpretation services.

### **Free interpretation services:**

- **Community Connect** is a resource and referral service for youth, families and community-based organizations (CBO) utilizing web-based strategies and a confidential toll-free hotline. Community Connect's mission is to increase access to and visibility of New York City's opportunities for young people by serving as one-stop shopping for all youth-and community resources in NYC. Community Connect and receptionists at DYCD main offices provide information and assistance to callers in over 180 languages.
- **Notification of free interpretation services:** In the event a visitor to DYCD's offices needs language assistance DYCD receptionists utilize tools developed by the Mayor's Office to assist agencies in the implementation of their language access services. These tools include standard signage and language identification tools. The signs have been updated to include 22 languages including those required by law.

### **Translation Services:**

- **DYCD Website** includes translation into all required languages plus many others for over 180 language options. It provides information to young people, parents and community-based organizations about DYCD-funded services and how to access funding opportunities.
- **discoverDYCD** allows users to search in multiple languages for DYCD-funded programs, by borough, neighborhood or zip code, and provides contact information, activities offered, and a mapping feature with navigation. It provides enhanced search capabilities for New Yorkers to find DYCD resources in over 180 languages. DYCD also launched the sign-up feature which allows users to apply to many of DYCD-funded services directly from the web or smart phone in all required languages. The goal is for discoverDYCD to serve as the hub to develop pathways for our participants, enable access to other City services and benefits, directly capture participant feedback, and market events.
- **Translations of the most commonly distributed documents:** DYCD has supported the translation of the most commonly distributed documents including the Community Needs Assessment, universal applications, and parents' consent forms through Language Line. The Language Access Coordinator works with the Senior Director of Strategic Communications & Stakeholder Engagement, the Office of Public Information and other senior staff in determining which commonly distributed materials need to be translated into the required languages and others including Yiddish and on the use of plain language. DYCD also surveys agency personnel on language skills to assist as well.
- **Emergency Preparedness:** DYCD's website and Community Connect are constantly updated to reflect which programs are operational. This helps ensure that LEP New Yorkers can get the most up-to-date information on programming and other critical services.

## **VII. Training**

DYCD provided the agency's Language Access Plan to all employees. The Language Access Coordinator meets with agency personnel including Community Connect to discuss the City's Language Access laws and ensure that the agency continues to meet and exceed its requirements.

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

DYCD keeps a record of the number of calls received by Community Connect and requiring interpretation services. Additionally, DYCD tracks all complaints filed thru 311, Community Connect and the Commissioner's e-mail portal.

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

DYCD contracts with Language Line to handle calls received by Community Connect and visitors to agency reception areas to provide interpretation services. Additionally, DYCD has supported the translation of the most commonly distributed documents through Language Line including the Community Needs Assessment, universal applications, and parents' consent forms. DYCD also surveys agency personnel on language skills to assist as well. DYCD will be reviewing the number of calls received through Community Connect and data collected on the Universal Application form to make refinements to its Language Access Plan.

The Language Access Coordinator meets regularly with Community Connect, the Public Information Officer and the Agency Chief Contracting Officer to ensure the agency has the resources necessary to support this plan.

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

DYCD broadly and consistently promotes Community Connect and DiscoverDYCD through social media, email blasts and advertises that information is available in over 180 languages. DYCD also issues press information to many publications including many in other languages and our large cadre of community-based organizations publishes the availability of services in their community.

## **XI. Language Access complaints**

Members of the public may make complaints concerning Language Access through 311, Community Connect, the DYCD Commissioner's office or directly through the Language Access Coordinator. The Language Access Coordinator is responsible for keeping a log of all complaints, and ensuring that all are addressed in a timely fashion.

## XII. Implementation plan logistics

Language access goal	Milestones	Responsible staff	Deadline
Continue enhancements to DiscoverDYCD including expansion of online enrollment	Ability of New Yorkers to find and sign up for a program on-line in their language.	IT	Ongoing improvements are constantly made.
Providing interpretation services to LEP callers to Community Connect to access services and ask questions to Community Connect Resource Specialists	All LEP callers are immediately connected to services through interpretation services through Language Line.	Community Connect	On-going
Translating commonly distributed documents in the 10 designated Citywide languages and others as needed in plain language.	Universal forms and other commonly distributed documents are available in the 10 required languages as needed.	Program staff, Language Access Coordinator and the Office of Public Information.	On-going

# Language Access Implementation Plan

Mayor's Office to End Domestic and  
Gender Based Violence

March 2021

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I. Agency Name and Agency Language Access Coordinator

**Agency name** Mayor’s Office to End Domestic and Gender-Based Violence

**(ENDGBV)**

**Name of the agency’s Language Access Coordinator (LAC) and all office titles held by this individual.** Sara Gonzalez, Policy Advisor

## II. Agency Mission and Background

### **Mission**

Established in 2001, the Mayor's Office to End Domestic and Gender Based Violence (ENDGBV, formerly known as the Mayor's Office to Combat Domestic Violence or OCDV), develops policies and programs, provides training and prevention education, conducts research and evaluations, performs community outreach, and operates the New York City Family Justice Centers. ENDGBV collaborates with City agencies and community stakeholders to ensure access to inclusive services for survivors of domestic and gender-based violence (GBV). GBV can include intimate partner and family violence, elder abuse, sexual assault, stalking, and human trafficking.

### **Our Teams**

#### **NYC Family Justice Centers**

The NYC Family Justice Centers (FJCs) provide free and confidential assistance for victims and survivors of gender-based violence, which can include sexual violence, human trafficking, stalking, and intimate partner violence. All Centers are open Monday through Friday, from 9 a.m. to 5 p.m. No appointment is needed. The FJCs are working remotely during COVID with plans to reopen as the city does. At any NYC FJC, survivors of gender-based violence and their children can get connected to organizations that provide case management, economic empowerment, counseling, and civil legal and criminal legal assistance. Located in all five boroughs, FJCs are safe, caring environments that provide one-stop services and support. Key City agencies, community, social, and civil legal service providers, and District Attorney's Offices are located on-site at every FJC to make it easier for survivors to get help.

All are welcome regardless of language spoken, income, gender identity, or immigration status. Interpretation services are available on-site at every FJC, and all locations are wheelchair accessible.

#### **Community Outreach**

ENDGBV's Outreach Team engages New York City communities through a wide variety of public engagement and education efforts, including: conducting workshops and organizing community events for community members and organizations; sharing information through tabling, resource fairs, and supporting community events, as well as through partnerships with sister agencies and community-based organizations; and building the capacity of local communities to prevent, recognize, and respond to GBV.



## **Research and Evaluation**

Our Research and Evaluation Team provides data management and support to all ENDGBV units, programs, and initiatives; and conducts multi-disciplinary research projects with interagency research partners to inform future work concerning the prevention and response to GBV. This team provides evaluation and data management support to other agencies with programs that assist survivors of GBV.

## **Policy and Training Institute**

The Policy and Training Institute ("the Institute") leads the Office's training, prevention, and policy work. The Institute, which is comprised of the Policy Team, the Training Team, and the NYC Healthy Relationship Training Academy, was created to enhance City agency and community-based organization (CBO) responses to GBV, identify key areas for policy change and development, and engage in primary prevention through work with young people throughout New York City.

### **Training Team**

The Training Team provides tailored trainings to City agencies and CBOs on topics across the spectrum of GBV, as well as providing technical assistance in the review and development of their policies and protocols.

### **NYC Healthy Relationship Training Academy**

established in 2005, the Academy provides educational and skill-building training workshops for youth, parents and caregivers, and organizations that provide services to young people about healthy relationships and teen dating violence.

### **Policy Team**

The Policy Team develops policies and programs to address systemic gaps for survivors of GBV, and leads the Office's equity and inclusion work, housing the Language Access Coordinator, Disability Service Facilitator, and LGBTQ Liaison, as well as chairing ENDGBV's Equity Committee.

## **III. Agency Language Access Policy and Goals**

ENDGBV aims to ensure that all New Yorkers, including those with limited English proficiency (LEP), have meaningful access to the information and services administered or operated by the

Office, including outreach efforts, training and prevention education, external agency communications, and the NYC Family Justice Centers. Language access is provided via telephonic interpretation service and/or training provision in non-English languages, translated materials, American Sign Language (ASL) interpretation, Communication Access Real-time Communication (CART) services, and other means, as appropriate. All provider staff at the FJCs, including contracted and in-kind providers, have access to City-contracted language access services through ENDGBV. Signage informing LEP clients of their right to an interpreter and the right to file a complaint with a manager and/or via 311 are posted conspicuously in all FJC facilities. This signage, provided by the Mayor's Office of Immigrant Affairs (MOIA), provides information in New York City's ten designated citywide local law languages – Spanish, Chinese, Russian, Haitian Creole, Bengali, Korean, Arabic, Urdu, French and Polish.

All ENDGBV staff and FJC on-site partner agency staff members who work with members of the public are provided information on language access rules, procedures, and instructions for using telephonic interpretation during mandatory FJC staff onboarding orientation that introduces FJC policies and procedures to staff prior to their starting work at the FJCs. After this initial staff orientation, ENDGBV staff and FJC partner agency staff are required to receive annual language access training, described in further detail in Section 4 of this report.

Due to COVID-19, the FJCs began operating remotely in March 2020, providing critical services to survivors of GBV over the phone. Staff relied heavily on Voiance to help provide telephonic interpretation and translate voicemails from new and existing clients.

### **Accessibility of Interpretation**

At the NYC Family Justice Centers, operated by ENDGBV, staff use telephonic interpretation, in-person interpretation (in limited circumstances), or provide services in an LEP client or community member's non-English language, if the provider is fluent or sufficiently proficient to communicate meaningfully and effectively in that non-English language. ENDGBV recognizes that LEP or non-English primary language speakers may, at times, find it difficult to discuss topics related to violence, abuse, violation, trauma, or complex systems-related themes when speaking in a language other than their primary language. For these reasons, ENDGBV provides interpretation to all LEP clients and community members engaging with the FJC in any capacity, whether they are working directly with ENDGBV staff, or contracted or in-kind providers. Interpretation services are made available if and when an LEP or non-English primary language speaker requests, regardless of their ability to otherwise communicate in English.

## **Use of Children, Friends, and Family as Interpreters**

ENDGBV policies in place that strictly prohibit staff at the NYC Family Justice Centers from using minor children to act as interpreters during any client or community member engagement, except in exigent circumstances. Additionally, FJC staff and clients are strongly discouraged from the use of adult children, relatives, and friends of clients and community members to provide interpretation. In an FJC setting, adult children, relatives, and friends of the client seeking services may only be utilized to communicate basic information or after the LEP person seeking services meets alone with staff and discusses, using telephonic interpretation, our general policy against, and the potential complications or concerns that may arise from the use of adult children, relatives, or friends as interpreters. Additionally, we advise clients that confidentiality or privilege may be jeopardized if an adult child, relative, or friend is present in a room. Clients who are deaf or hard-of-hearing and do not communicate through ASL may not be able to access interpretation services through ENDGBV's existing providers when walking into an FJC; in such instances, all efforts are made to engage such clients at this initial visit, including the potential use of friends and/or non-minor family members as interpreters. Except in exigent circumstances, ENDGBV strongly discourages the use of non-professional or non-certified interpreters.

## **Written Communications**

ENDGBV encourages and facilitates the use of plain language in all public-facing materials, including online content. All document translations must be completed by a certified translator, either through the City's contracted vendor, or through use of the Citywide Volunteer Language Bank (VLB) which is comprised of City staff who have been certified as having professional command of a specific language or languages. Translated documents must be reviewed for coherence, sensitivity to GBV, with content reviewed by multilingual office staff, partner agencies, or through the VLB before they are finalized.

## **IV. Agency Language Access Accomplishments and Progress on Goals from Previous LAIP**

### **Language Access Accomplishments 2018-2020**

#### **Translation**

- Completed translation of the office's most widely distributed documents after they were re-designed to reflect the office's expansion

o Intimate Partner Violence Brochure

o Stalking Brochure

o Family Violence Brochure

o Sexual Violence Brochure

o Human Trafficking Brochure

- Translated FJC Client Satisfaction Surveys
- Translated survey responses received from FJC Client Satisfaction Surveys
- Quality assured 9/10 FJC palm cards

- 
- Translated COVID-19 closure signs for the FJCs
  - Translated and distributed a multilingual flyer, with top ten languages for those who may need GBV help during COVID-19
  - Translated COVID-19 Relief Survey
  - Translated COVID-19 Impact Survey to be placed on website
  - Translated Consent Forms for an oral and written history research project
  - Translated Interview Prompt and Written submission forms for written history research project
  - Quality Assured 5/10 informational flyers for the FJCs

### **Interpretation**

- Administered staff survey to re-assess language capacity of ENDGBV staff and FJC on-site partners
- Consistently provided conference/training participants access to interpretation options as part of all event registration
- Hosted town halls on Zoom and provided Spanish interpretation

### **Plain Language:**

- Drafted document creation guide for internal use that incorporates plain language tips and accessibility awareness
- Reviewed each translated document for plain language
- Edited citywide curriculum to be accessible for parents and guardians

### **Training and Evaluation**

- Provided annual Language Access training to staff in all programs within ENDGBV

- Included written Language Access Policy in the updated FJC operations manual that is currently being finalized
- Surveyed FJC client regarding the services they received, including language access
- The Office completed over 33 trainings, workshops, and outreach events in other languages, including Spanish, Haitian Creole, Garifuna, Bangla, Arabic, and a few multilingual events

Updates to Goals from Previous LAIP

Goals from Previous LAIP	Updates
Translate second priority documents into LEP languages	Translation for second priority documents continues to be in progress; however, human translations of website and online content has been identified as a higher priority need for ENDGBV.
Review ENDGBV’s online resources for language accessibility	ENDGBV continues to explore how best to incorporate human-translated content on its websites.
Track languages spoken by LEP callers to FJCs	All FJC clients, including LEP callers, are assessed for language needs, with languages spoken tracked in the FJC screening application.
Operationalize language services feedback for FJC Clients	Created and administered an FJC client survey that includes feedback on language access in 2019-2020.
Enhance services for LEP clients at FJCs	Based on FJC client feedback survey, which included responses from LEP clients, no additional service enhancements are being explored at this time.
Prioritize language abilities in future internal staffing procedures and contracts for GBV programs and services	ENDGBV has prioritized language abilities for hiring in key positions, such as community outreach, adding multiple bi-lingual staff in 2019. The office also continues to work on identifying means to require or prioritize language abilities in future contracts.

Review ENDGBV’s Emergency Preparedness Plan for language accessibility	Reviewed completed plan and adjustments made in 2019.
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## V. LEP Population Assessment

Factor 1: the number or proportion of LEP persons in the eligible service population (demographic analysis, e.g., Census data)

**Total languages spoken at home other than English**

#	Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island
1	Spanish 49.2%	Spanish	Spanish	Spanish	Spanish	Spanish
2	Chinese* 12.9%	Yoruba, Twi, Igbo**	Chinese*	Chinese*	Chinese*	Chinese*
3	Russian 4.8%	French	Russian	French	Bengali	Russian
4	Bengali 3.1%	Bengali	Yiddish	Japanese	Korean	Arabic
5	Yiddish 2.6%	Arabic	Haitian	Russian	Russian	Italian
6	French 2.5%	Chinese*	Arabic	Yoruba, Twi, Igbo**	Tagalog***	Polish
7	Haitian 2.5%	Italian	French	Korean	Polish	Urdu
8	Yoruba, Twi, Igbo** 2.1%	Tagalog***	Urdu	Italian	Greek	Hebrew
9	Arabic 1.9%	Amharic*^	Hebrew	Hebrew	Punjabi	Tagalog***
10	Italian 1.6%	Haitian	Bengali	German	Haitian	Nepali^^
11	Korean 1.6%	Russian	Italian	Hindi	Hindi	Yoruba**
12	Polish 1.4%	Korean	Polish	Portuguese	Arabic	Malayalam^

\*Includes Mandarin, Cantonese

\*\* Includes other languages of Western Africa

\*\*\*Includes Filipino

^Includes Kannada, or other Dravidian languages

^^Includes Marathi, or other Indic languages

^^^Includes other Slavic languages

\*^Includes Somali, or other Afro-Asiatic languages

Sources: U.S. Census Bureau, 2018 American Community Survey Summary File

Population Division – New York City Department of City Planning (December 2019)

Table 1: This table depicts the total language spoken at home other than English.

**Total languages spoken at home other than English by those with LEP**

#	Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island
1	Spanish 48.5%	Spanish	Spanish	Spanish	Spanish	Spanish
2	Chinese* 18.9%	Yoruba, Twi, Igbo**	Chinese*	Chinese*	Chinese*	Chinese*
3	Russian 6.3%	Bengali	Russian	Japanese	Bengali	Russian
4	Bengali 3.5%	French	Yiddish	French	Korean	Italian
5	Haitian 2.1%	Arabic	Haitian	Russian	Russian	Polish
6	Korean 1.9%	Chinese*	Arabic	Korean	Polish	Arabic
7	Arabic 1.7%	Italian	Urdu	Bengali	Haitian	Nepali^^
8	Yiddish 1.7%	Haitian	Bengali	Haitian	Punjabi	Malayalam^
9	French 1.4%	Russian	Polish	Yoruba, Twi, Igbo**	Arabic	Urdu
10	Polish 1.4%	Korean	French	Hebrew	Hindi	Tagalog***
11	Urdu 1.1%	Tagalog***	Italian	Italian	Tagalog***	Ukrainian^^^
12	Yoruba, Twi, Igbo** 1.1%	Vietnamese	Ukrainian^^^	Portuguese	Greek	Korean

\*Includes Mandarin, Cantonese

\*\* Includes other languages of Western Africa

\*\*\*Includes Filipino

^Includes Kannada, or other Dravidian languages

^^Includes Marathi, or other Indic languages

^^^Includes other Slavic languages

Sources: U.S. Census Bureau, 2018 American Community Survey Summary File

Population Division – New York City Department of City Planning (December 2019)

Table 2: This table depicts the total language spoken at home other than English by those with LEP.

- Factor 2: the frequency with which LEP individuals come into contact with the agency

**Primary Language - New FJC Clients 2018-2021**

Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island
Spanish 70.8%	Spanish	Spanish	Spanish	Spanish	Spanish
Mandarin 6.6%	French	Russian	Mandarin	Mandarin	Arabic*
Russian 3.7%	Bengali	Mandarin	French	Bengali	Russian
Bengali 3.0%	Arabic*	Haitian Creole	Russian	Arabic*	Urdu
Arabic (All Dialects) 2.7%	Albanian**	Arabic*	Portuguese	Russian	Mandarin
French 1.5%	Wolof/Ouoloff	Bengali	Arabic*	Urdu	Polish
Urdu 1.3%	Urdu	Urdu	Japanese	Korean	French
Haitian Creole 0.9%	Haitian Creole	Cantonese	Cantonese	Hindi	Italian
Cantonese 0.8%	Portuguese	French	Bengali	Punjabi	Albanian**
Portuguese 0.6%	Mandingo	Hebrew	Polish	Portuguese	Cantonese
Korean 0.6%	Russian			Haitian Creole	

Percentages calculated based on total of 8,209 new clients from 2018-2021 who selected languages other than English as their primary language.

\*Includes all dialects

\*\*Gheg & Tosk

Table 3: This table depicts the Primary Language of New FJC Clients

Telephonic Usage Bronx and Brooklyn FJC						
FJC Total			Bronx		Brooklyn	
1	Spanish	371	Spanish	91	English	88
2	Mandarin	166	French	22	Russian	59
3	Bengali	99	Bengali	17	Mandarin	52
4	Russian	79	Arabic (All Dialects)	8	Cantonese	29
5	Arabic (All Dialects)	67	Urdu	5	Bengali	28
6	French	43	Wolof/Ouoloff	2	Arabic (All Dialects)	22
7	Cantonese	43	Albanian (Gheg & Tosk)	2	Haitian Creole	15
8	Urdu	32	Cantonese	2	Urdu	13
9	Haitian Creole	20	Hindi/Mandingo/Po lish/TWI	1	Uzbek	9

Table 4: This table depicts the telephonic usage in Bronx and Brooklyn and the total of FJC telephonic usage.

Telephonic Usage Manhattan, Queens, and Staten FJCs								
FJC Total			Manhattan		Queens		Staten Island	
1	Spanish	371	Spanish	56	Spanish	98	Spanish	72
2	Mandarin	166	English	30	English	76	Arabic (All Dialects)	16
3	Bengali	99	French	17	Bengali	56	Urdu	10
4	Russian	79	Cantonese	10	Arabic (All Dialects)	23	Russian	7
5	Arabic (All Dialects)	67	Arabic (All Dialects)	9	Punjabi	14	Mandarin	7
6	French	43	Bengali	5	Russian	10	Cantonese	4
7	Cantonese	43	Russian	5	Nepali	10	Bengali	3
8	Urdu	32	Japanese	4	Korean	7	French	2
9	Haitian Creole	20	Portuguese/Punjabi /Hindi	3	Hindi/Urdu	7	Sinhalese/Tamil (Sri Lankan & Indian)	2

Table 5: This table depicts the telephonic usage in Manhattan, Queens, and Staten Island and the total of FJC telephonic usage.

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

Due to the often-complex circumstances of GBV, a holistic and multifaceted approach to services and systems is critical for a survivor or victim to work toward safety and stability during and after instances of violence or abuse. These services may include case management, counseling,



psychiatric care, safety planning, civil legal services, housing, and public benefits assistance, and/or speaking with law enforcement agencies, including prosecutors and police. Language access services are essential for the provision of these critical services to LEP victims and survivors of trauma and abuse. This is especially true for instances when a victim or survivor may need to recall their victimization in detail when seeking immigration remedies, filing police reports, or meeting with prosecutors.

LEP communities across the City also have unique needs when it comes to identifying gender-based violence, raising awareness of critical resources for survivors, and addressing barriers faced when help seeking. In order to reach survivors from culturally and linguistically distinct backgrounds, outreach efforts must include both translated materials and real-time interpretation. Similarly, any efforts to solicit feedback and understand the experiences of diverse groups of survivors through research must include language access services to ensure inclusion for LEP populations.

Training, events, and other efforts directed primarily at service providers, while important, are generally considered less critically essential for language access at this time.

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

##### Available Resources

##### NYC Family Justice Centers and Community Outreach

###### FJCs

ENDGBV administrative staff and partner agency staff located at the FJCs have:

- Access to telephonic interpretation provided by Voiance, in over 240 languages.
- Dual-handset telephones available in reception areas for telephonic interpretation in open spaces.
- Speaker telephones for telephonic interpretation in private or enclosed office spaces.
- Multilingual “I speak” signs prominently displayed at every FJC.

###### Community Outreach

ENDGBV Outreach Team staff have:

- Access to telephonic interpretation provided by a City-contracted provider, in over 240 languages.
- Multilingual and diverse staff and access to other multilingual staff from City agency and community-based partner organizations.
- Informational handouts distributed by the Outreach Team, which include:

- A handout about ENDGBV and the NYC 24-hour Domestic Violence Hotline is available in a multi-language accordion-fold pocket document, which includes English, Spanish, Russian, Chinese, Arabic, and Bengali

**Cost of Providing Language Services**

ENDGBV utilized \$221,050 from 2018-2020 in interpretation services. The office’s previous LAIP did not differentiate telephonic and in person/virtual ASL interpretation, therefore the following chart shows total spent for 2018-2019. The office has since begun separating Telephonic and ASL cost.

<b>Fiscal Year</b>	<b>Total Cost</b>
2018	106,941
2019	66, 979

Table 5: This table reflects overall interpretation cost for FY18 and FY19.

<b>FY20</b>			
<b>Borough</b>	<b>Telephonic Interpretation</b>	<b>ASL (in-person) Interpretation</b>	<b>Total</b>
Bronx	\$ 7,142	\$ 2,493	\$ 9,635
Brooklyn	\$ 11,123	\$ 2,104	\$ 13,226
Manhattan	\$ 3,756	\$ 2,892	\$ 6,647
Queens	\$ 14,768	\$ 134	\$ 14,902
Staten Island	\$ 2,720	\$ -	\$ 2,720
<b>Total</b>	<b>\$ 39,508</b>	<b>\$ 7,622</b>	<b>\$ 47,130</b>

Table 6: This table reflects telephonic and ASL interpretation cost per borough and the total amount.

**VI. Provision of Language Access Services**

**Language Access in General Agency Services**

ENDGBV staff interaction with the public includes in-person service delivery, outreach activities, trainings, and written and telephonic correspondence. Telephonic interpretation is available via a City-contracted provider in over 240 languages. Agency staff are trained to use telephonic interpretation and to identify potential challenges with interpreters. If low quality or inappropriate interpretation is provided, staff will follow the procedures outlined in the *Language Access Complaints* section of this plan and report the issue to the appropriate ENDGBV administrative staff member. ENDGBV does not currently use selective certification to recruit language speakers; however, candidates with multilingual abilities are strongly encouraged to apply for positions. ENDGBV aims to identify means to prioritize language abilities in future contracts for gender-based violence programs and services and other internal staffing procedures.

## Translations

The vendor used for translated documents is Language Line. The Language Access Coordinator, currently Sara Gonzales, oversees the translation process of all office materials, which includes quality assurance. Quality Assurance follows three tracks: 1<sup>st</sup> utilizing internal staff with language capacity as content experts, 2<sup>nd</sup> utilizing partner agency staff with language capacity, and 3<sup>rd</sup> utilizing the City's VLB for languages the office does not have access to.

ENDGBV prioritizes primary documents for translations over secondary documents. Previously, primary documents were prioritized in the order they were received, but because of the emergency translations needed during COVID-19, the office is now improving the prioritization process. The Language Access Coordinator has created an IRM to track translation requests and a memo for all staff that provides a detailed description of the translation process, from plain language to quality assurance. In addition to documents, ENDGBV is also working on translation of digital content.

ENDGBV will prioritize language access by: (1) considering where materials can be designed to be multilingual and use English plus the ten designated languages; (2) ensuring that any new documents follow plain language guidelines; and (3) continuing to translate all completed documents into the City's designated languages. Translated materials will be posted on ENDGBV's website, where they can be accessed by both provider staff and members of the public.

## Interpretation Services

### *In-Person Interpretation*

ENDGBV has multilingual and diverse staff throughout the office, as well as through provider staff at the FJCs. For FJC clients and community members who require in-person interpretation in a language that is not provided by staff, FJC staff can arrange for in-person interpretation for languages spoken throughout the City through contracted City vendors, including for American Sign Language. In-person interpretation must be requested in advance of the appointment, in order for accommodations to be arranged; as such, they may not be immediately available to clients who walk in without an appointment at the FJC. In-person interpretation services can be provided at the FJCs on subsequent visits when the ENDGBV administrative team at the FJC is advised of the need. All FJC staff are trained to make in-person interpretation requests.

In CY19, ENDGBV surveyed ENDGBV staff and FJC on-site staff to get an updated assessment for staff language capacity. The Office is now exploring how to connect bilingual or multilingual staff who may want to become certified as interpreters and translators, with existing opportunities

throughout the City, to help ensure the consistency and quality of in-person interpretation available throughout the Office’s programs.

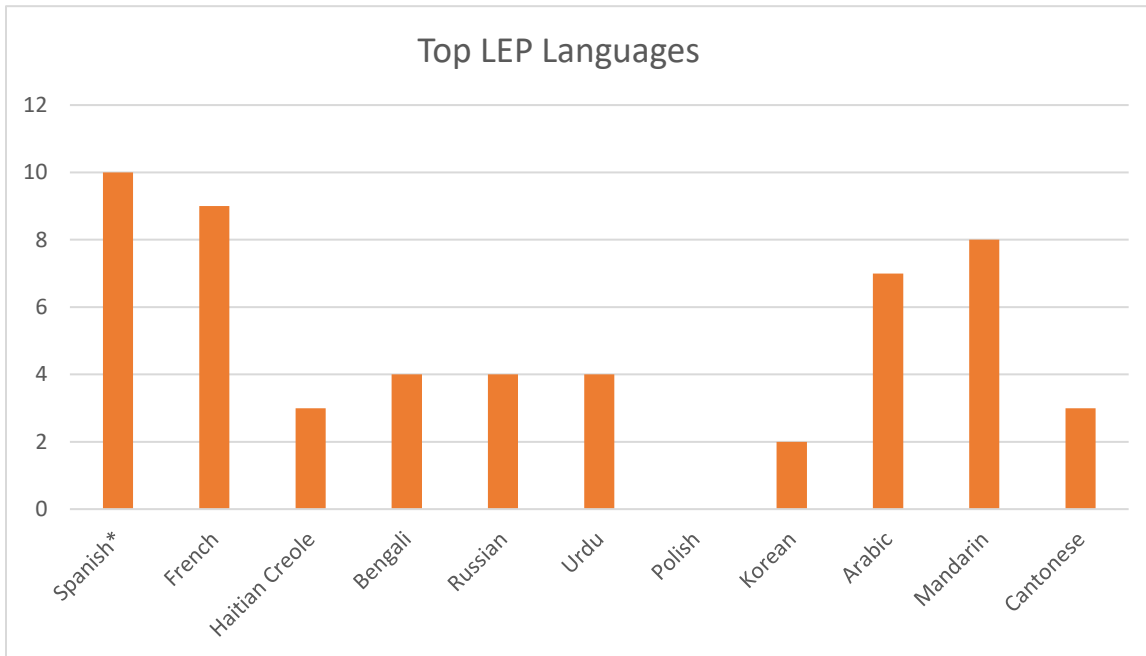


Chart 1: ENDGBV staff and FJC on-site staff language capacity in correlation with top LEP languages in NYC

\*ENDGBV has 84 Spanish speakers.

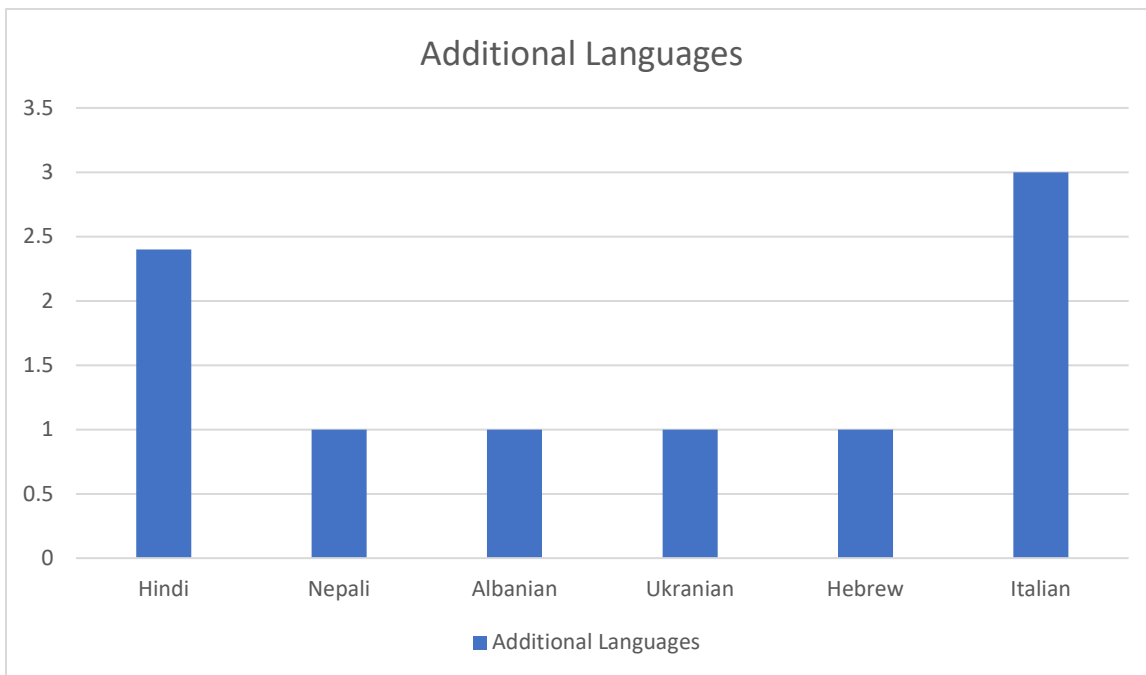


Chart 2: Additional languages spoken by ENDGBV staff and FJC on-site staff

### *Telephonic Interpretation*

FJC staff have access to telephonic interpretation via a City-contracted provider, Voiance, that provides interpretation into any language necessary.

The FJCs provide telephonic interpretation to all LEP or non-English primary language speakers who request the service, regardless of the person's ability to otherwise generally communicate in English. FJC staff have access to speaker telephones for telephonic interpretation in private or enclosed office spaces. The reception areas at each FJC are also equipped with dual-handset telephones that enable telephonic interpretation in public spaces.

All FJC staff are trained to use telephonic interpretation and to identify potential challenges with interpreters. If low quality or inappropriate interpretation is provided, staff will follow the procedures outlined in the Language Access Complaints section of this plan and report the issue to the appropriate ENDGBV staff member.

Currently, complaints are emailed to the Language Access Coordinator. From 2018-2020, the office had a low number of complaints and received no complaints via 311. In late 2020 and early 2021, FJC staff began documenting longer wait times which caused clients to hang up, and a difficult time with high quality Russian translators.

The Language Access Coordinator met with FJC staff in April 2021 to develop procedures for better documentation and tracking of complaints, how to better promote and encourage feedback from clients, and the internal structure of how to centralize the tracking of complaints.

## **Outreach**

### *In-Person Interactions*

ENDGBV Outreach Community Liaisons conduct outreach in English, Spanish, French, Bengali, Arabic, and Haitian Creole, as well as working with partners who are often proficient speakers of languages other than English. ENDGBV identifies LEP communities for outreach based on rates of LEP FJC client service engagement and through collaboration with community-based organizations and stakeholders.

When Community Liaisons encounter a member of the public speaking a non-English language, all efforts are made to connect the person with an outreach worker speaking their language. If an outreach worker who is fluent or sufficiently proficient in that language is not available, all outreach workers can access telephonic interpretation in over 240 languages through a City-contracted provider. Additionally, outreach workers have informational materials available in

multiple languages: including English, Spanish, Russian, Chinese, Arabic, and Bengali, Haitian Creole, Korean, Urdu, French, and Polish.

#### *Over-the-Phone Interactions*

Since teleworking due to COVID-19, the Outreach Team has conducted workshops in Bengali and Arabic, and continues to offer services in Spanish, Haitian-Creole, French, and English. If an outreach staff member connects via telephone with a speaker of a non-English language that they do not speak, the outreach staff member conferences in a telephonic interpreter service.

#### **Language Access in Agency Communications**

Language Access is considered in all office communications, including electronic media and ethnic and community media, for general content, as well as communications in the case of an emergency. For all public-facing events, trainings, and conferences, ENDGBV includes information about accessibility on event materials, along with instructions for requesting interpretation. When ENDGBV receives a request for ASL or other interpretation for partner and community-based organization staff trainings, ENDGBV administrative staff reaches out to a contracted provider to schedule interpretation in advance of the training. For online communications, the Office's website and the NYC HOPE Resource Directory both use the Google Translate plug-in to provide access for LEP individuals, per standards set forth by the Department of Information Technology and Telecommunications (DoITT). Materials that the Office has already translated into the City's designated languages are available on our website as PDFs.

In 2020, ENDGBV worked with DoITT to configure human translations of critical information on its website and the NYC HOPE Resource Directory to maintain consistency with above mentioned. ENDGBV will continue to explore additional paths and funding to enhance the human translation of online content throughout 2021. While the Office does not typically post content in multiple languages on social media, in 2020, the outreach team created PSAs in Spanish, Arabic, Bengali, Haitian-Creole, and French. ENDGBV will explore how to create more multiple language communications.

#### **Plain Language**

ENDGBV sent multiple staff to DCAS's 1.5 training on plain language in 2017, with the goal of empowering these staff to train other units in the office on the principles of plain language. However, due to staff transition among group members throughout 2018, only one member of the original group was available by the fall; subsequently, plain language trainings were not conducted. The single remaining staff member who completed DCAS' plain language training continues to review newly developed communications, including documents, flyers, brochures, and online content for plain language; however, it would be sustainable to have a group do this

work. ENDGBV was unable to fulfill its plan to send additional staff to plain language training because DCAS was no longer offering the training in CY19.

ENDGBV created an accessibility guide for document creation that included plain language tips and formatting. Staff members were not cleared by DCAS for the Plain Language Training in June 2020, though our Language Access Coordinator is working with the providers to offer an all-staff training in 2021.

## Policies and Procedures

In CY19, ENDGBV created an accessibility guide for document creation that included plain language tips and formatting. In CY20, an IRM to receive and track translation requests was created, along with a memo documenting the translation process for requests, the time frame for translations, and our quality assurance procedure.

## Notification of Free Interpretation Signage

All FJCs have prominently displayed signage for visitors in multiple languages (including the ten City-designated languages) that indicate the availability of interpretation, and how complaints can be made. Additionally, each FJC reception desk is staffed with staff trained to offer and use telephonic interpretation, to ensure effective and meaningful communication with FJC visitors. Each FJC makes available “I speak” cards for clients to use as they engage with other systems or organizations, to indicate that they require assistance in a non-English language.

## Language Beyond the Top 10

ENDGBV’s City-contracted provider, Voiance, provides telephonic interpretation for over 240 languages. The newly created translation IRM includes options for 25 languages.

## Emergency Preparedness

ENDGBV and its programs continue operations during an emergency as determined by City officials and utilize standard processes to provide language access through telephonic interpretation, as well as by staff that are fluent or proficient in the non-English primary language of the client seeking assistance during an emergency, as appropriate. ENDGBV will forward relevant emergency notifications from the Office of Emergency Management (OEM), available with links in over 12 languages, on its social media accounts. Additionally, in the case of weather or other emergencies, the FJCs may post printed standard notifications in 12 languages, as provided by OEM, in conspicuous locations at relevant sites.

As of CY19, the FJCs have multiple languages currently recorded for emergency responses:

- **Manhattan Family Justice Center:** English, Mandarin, French, Spanish

- **Staten Island Family Justice Center:** English, Spanish
- **Queens Family Justice Center:** Spanish, Mandarin, Korean, Bengali, Hindi
- **Bronx Family Justice Center:** Spanish, French, Italian, Albanian, English
- **Brooklyn Family Justice Center:** English, Spanish

At the start of the COVID-19 pandemic and as New York State issued stay-at-home orders, ENDGBV created multilingual signs to be displayed prominently at each FJC to inform any clients attempting to make a walk-in visit that the location was closed but available for phone calls. Before stay-at-home orders, MIS had equipped staff with the technology to telework. For the FJCs, this included making sure that phone calls could be directed to screeners with access to Voiance to determine the language needed to communicate with a client.

ENDGBV is continuing to develop and implement revised emergency preparedness plans to support our staff in meeting the needs of LEP clients during an emergency.

### Licenses, Permits, and Registrations

N/A

## VII. Training

FJC staff are given information on language access and instructions for using telephonic interpretation during their mandatory staff orientation conducted prior to their working at an FJC. In addition, all ENDGBV and FJC partner agency staff receive language access training annually each spring, during mandatory attendance staff meetings. Training on Language Access primarily focuses on the delivery of services using telephonic interpretation when staff members do not speak the primary language spoken by the LEP individual, so that they can support survivors' gender-based violence.

### Training Topics Include:

- Overview of Federal and State Laws
- Overview of Language Access history in NYC, including Executive Order 41 (2003) and Executive Order 120 (2008)
- Overview of Local Law 30 (2016)
- Document translation process
- Translation request process
- Telephonic interpretation, including how to offer and use the services
- How to troubleshoot issues of securing effective interpretation for less commonly encountered dialects or languages



- How to provide positive and negative feedback on interpretation services, interpreter conduct, and issues securing telephonic interpretation
- In-person interpretation and how to make requests
- Language access guidelines for agency communications and materials
- Site or discipline-specific information, such as information on accessing telephonic interpretation in the field
- Event planning for language capacity and accessibility

In 2019, ENDGBV continued our annual language access trainings across the five NYC FJCs, as well as the administrative office. In addition to these trainings, ENDGBV is developing a written policy on language access with site-specific information that will be available to all staff and included in our newly updated FJC operations manual that will be distributed in Summer 2021.

ENDGBV was not able to offer annual language access trainings in 2020 due to staff capacity and an officewide focus on needs specific to COVID-19. The training will now be offered again in 2021, with newly added details about the process of document translation, due to the sharp increase for document translation requests in 2020.

## VIII. Record Keeping and Evaluation

ENDGBV reports and tracks our compliance with language access requirements, as well as additional steps taken to provide meaningful access to services and information to all LEP New Yorkers. The Language Access Coordinator (LAC) is responsible for retrieving data from each unit in order to review and report on that data in annual Language Access reports. The LAC is also responsible for receiving and resolving language access complaints and conducting quarterly reviews of language access data to identify trends or potential areas for improvement. In 2019, the LAC received feedback that Voiance did not have interpretation available in two indigenous languages, one from Africa and one from South America, which were needed at the Brooklyn and Queens FJC, respectively. In each instance the LAC directed FJC staff to call the respective country's embassy. Recently, staff have reported extreme delays in service and an inability of the Voiance automated system to hear the language being requested.

Provision of language services is primarily tracked by the FJC screening application and telephonic interpretation usage across all programs. At the FJC, each client meets with a screener who records information in the FJC screening application, including client's primary language and interpretation needs during their first visit. The FJC screening application uses a list of 161 languages and provides an option of "other." If a client indicates a language not listed, the screener selects the "other" option and records the language spoken by the client in an open

field. The limited information recorded in the FJC screening application is available to other providers, dependent upon clients' individual confidentiality and privacy requests.

In 2020, ENDGBV launched a microgrant program specific to providing emergency funds for clients impacted by COVID-19. Surveys administered for the program were translated into the top ten languages, and any follow up evaluations will also be translated.

## IX. Resources Analysis and Planning

ENDGBV staff and FJC on-site partner agency staff members provide meaningful language access through telephonic interpretation and the provision of services in an LEP client's non-English language. ENDGBV does not currently use selective certification to recruit bilingual and multilingual language speakers; however, candidates with multilingual abilities are strongly encouraged to apply for positions.

Meetings with each unit within ENDGBV to develop specific plans for each department convened in April 2021. The Language Access Coordinator will begin a Language Access Convening with members from each team to have regular check-ins and monitor progress toward language access goals. ENDGBV continues to work on identifying means to require or prioritize language abilities in future contracts for gender-based violence programs and services and other internal staffing procedures.

## X. Outreach and Public Awareness of Language Access Services

ENDGBV provides notification of language access services via outreach materials, including flyers for events, FJC materials such as palm cards and flyers, and online materials. In addition, staff can conduct outreach in multiple languages for specific communities, and each FJC has on-site signage with notifications of client rights to interpretation. When the office plans a public service announcement campaign, language access is considered in the provision of materials in languages other than English and language needs are assessed in registrations.

The Outreach team plans to continue to develop multilingual social media posts and direct outreach to community. ENDGBV is working to provide support in enhancing the language capacities of ENDGBV's current staff.

## XI. Language Access Complaints

Members of the public can submit language access complaints, questions and requests through the office using the language access email address ([LanguageAccess@endgbv.nyc.gov](mailto:LanguageAccess@endgbv.nyc.gov)), through 311, or by speaking with a member of the ENDGBV Administrative team at an FJC.

Signage informing LEP clients of the right to an interpreter, as well as the right to file a complaint, is posted in conspicuous locations throughout FJC facilities. This signage, provided by MOIA, provides information in New York City's ten designated languages – Spanish, Chinese, Russian, Haitian Creole, Bengali, Korean, Arabic, Urdu, French, and Polish. ENDGBV's website also includes information on making accessibility-related inquiries and submitting language access complaints.

ENDGBV will explore the best way to provide the information in the additional 15 languages added to the IRM, as well as providing the information at online and at in-person events that utilize interpretation.

## XII. Implementation Plan Logistics

<b>Language Access Goal</b>	<b>Milestones</b>	<b>Responsible Staff</b>	<b>Deadline</b>
Convene ENDGBV Language Access meetings	*Identify participants *Identify group structure	Language Access Coordinator	April- May 2021
All staff plain language training	*Review and update plain language training	Language Access Coordinator	June 2021
Develop complaint tracking procedure	*Review existing complaint tracking procedure to identify strengths and gaps *Meet with LAC to understand best practices for complaint procedures	Language Access Coordinator + FJC Admin	September 2021
Create glossary to translate into top ten languages	*Identify content for the glossary *Obtain input from units throughout the Office	Language Access Coordinator and Language Access Team	December 2021
Update automated responses for FJCs in English and top ten languages	*Identify staff or partner agency staff who can speak top ten languages	FJC Admin + Language Access Coordinator	December 2021
Have Emergency Voicemails in top ten languages	*Identify staff or partner agency staff who can speak top ten languages	FJC Admin + Language Access Coordinator	January 2022

Language Access Goal	Milestones	Responsible Staff	Deadline
Translate Glossary		Language Access Coordinator	January 2022
Quality Assure Glossary		Language Access Coordinator	February 2022
Conduct Oral and Written History Research in top ten languages	*Identify research participants	Director of Research and Evaluation	July 2022
Have human translated material on NYC HOPE	*Consolidate materials in need of translation *Discuss budget implications *Develop translation plan that includes prioritized content	Communications Manager	September 2022
Translate necessary Oral and Written History responses		Language Access Coordinator	December 2022

## **FDNY LANGUAGE ACCESS IMPLEMENTATION PLAN June 2021**

### **I. Agency Name and Language Access Coordinator**

Fire Department of the City of New York  
Steve Ertrachter, Executive Director of Licensing.

### **II. AGENCY MISSION AND BACKGROUND**

The Fire Department (FDNY) provides services including:

- Responding to fires
- Providing Public safety strategies
- Responding to medical emergencies
- Responding to disasters
- Responding to terrorist acts
- Performing inspections and testing
- Licenses and Certifications

The FDNY protects the lives and property of NYC residents and visitors. The FDNY advances fire safety through its prevention, investigation and education programs, and contributes to the City's homeland security efforts. It responds to more than 278,000 fires and non-fire related emergencies and more than 1.3 million medical emergencies each year. The FDNY maintains approximately 250 firehouses and ambulance stations.

FDNY's Bureau of Fire Prevention certifies individuals and inspects various locations that are regulated by the NYC Fire Code. In addition to providing study materials to prepare for each exam, the FDNY provides helpful information to numerous industries that have potential hazards.

### **THE SERVICES THAT ARE PROVIDED BY THE FDNY TO THE GENERAL PUBLIC INCLUDE:**

- Fire Suppression
- Emergency Medical Service
- Fire Prevention Inspections
- Certificate of Fitness Licensing
- Fire Safety Education
- Fire Investigation

### **FDNY INTERACTS WITH THE PUBLIC:**

- during emergency situations;
- via inspections;
- via field and/or by home visit;
- over the phone and via electronic mail/fax;
- through different Certificate of Fitness seminars, classes and/or examinations;

- via public hearings, as well as other public events (such as forums, town halls, and during fire prevention week).

The FDNY's Bureau of Fire Prevention (BFP) has approximately 400 Fire Protection Inspectors, who inspect equipment and component parts of buildings for permitting and licensing. They also observe system tests. BFP inspectors conducts more than 225,000 inspections each year.

BFP has distinct units responsible for different kinds of inspections. These include, among others:

- **Bulk Fuel Safety Unit** whose inspectors inspect motor fuel storage systems at gas stations;
- **District Offices** inspectors typically issue FDNY violations and track renewals / inspections for FDNY permit accounts;
- **Explosives Unit** inspects and issues permits for explosives, fireworks and special effects;
- **Fire Alarm Inspection Unit** witnesses tests of new or altered fire alarm systems in the commercial buildings;
- **Fire Suppression Unit** witnesses tests of the sprinkler and standpipe systems;
- **Public Safety Unit** that inspects high-rises and places of public assembly such as daycare centers, pre-K programs, etc.

The fire operations field activities are performed by the uniformed personnel and are called "risk-based" and "mandatory" inspections (formerly AFID). There are about 43,000 risk-based inspections and 61,000 mandatory inspections conducted each year.

### **III. AGENCY LANGUAGE ACCESS POLICY AND GOALS**

The FDNY's goal is to continue providing interpretation and translation services to all customers who do not speak fluent English through the Language Line. Important forms and pamphlets are translated into the languages required by Local Law 30. When FDNY employees speak the native language of the Limited English Proficiency (LEP) customers, the employees will assist with interpreting basic information to provide the best possible customer service.

Through interpretation and translation, the FDNY continues to make sure important safety messages reach all New Yorkers in a way that they can understand.

In order to comply with Local Law 30, the FDNY has translated many documents that are useful to the public in order to carry out its mission and protect the lives and property of New York City residents and visitors.

### **IV. AGENCY LANGUAGE ACCESS ACCOMPLISHMENTS AND PROGRESS ON GOALS FROM PREVIOUS LAIP**

FDNY produced multilingual versions of more than 20] informational pieces for distribution to the public, including through social media on numerous topics that benefit the business community and residents.

During the pandemic, these multilingual fire prevention materials included brochures regarding safe sidewalk restaurant heating and safely keeping alcohol-based hand sanitizers.

FDNY supported accessible home vaccine distribution with the use of telephonic interpretation.

To ensure ongoing Fire Education when in-person classes were cancelled, FDNY expanded its educational videos with subtitles and posted those to social media platforms. Many of the voices were from bilingual FDNY staff.

## **V. LIMITED ENGLISH PROFICIENCY (LEP) POPULATION ASSESSMENT**

To assist service providers in determining what steps are necessary to provide meaningful access to the LEP population they serve, the Department of Justice developed a four-factor analysis.

### **FACTOR 1: THE NUMBER OR PROPORTION OF LIMITED ENGLISH PROFICIENCY (LEP) PERSONS IN THE ELIGIBLE SERVICE POPULATION**

FDNY's service area includes all of New York City. The FDNY can only estimate in the broadest terms the number of LEP persons to whom the FDNY provides emergency services. FDNY estimates that 23% of the New York City's population are LEPs as identified.

### **FACTOR 2: THE FREQUENCY WITH WHICH LIMITED ENGLISH PROFICIENCY (LEP) INDIVIDUALS COME INTO CONTACT WITH THE AGENCY**

FDNY Fire Safety Education staff and field personnel conducts events in:

- Community centers;
- Senior center facilities;
- Pre-school, elementary and high schools;
- Firehouses;
- Other places of assembly.

When available, events will continue throughout the community.

Fire safety presentations are done in schools throughout the city and specifically target neighborhoods that have experienced fatal fires.

Before we visit a school, to determine the ethnic and language mix, our fire safety educators:

- (a) consult a census map; and
- (b) discuss the student population with school personnel.



Based on that information, the FDNY brings language-appropriate materials. Many of our fire safety events require some translated materials. Fire safety educators bring English and other popular language materials to all events, especially at the larger public events. The FDNY inquiries about the language needs prior to events.

At fire safety events following fatal or serious fires, we assess the community needs with the community organization coordinators of these events. In schools, we primarily use English. The most frequent languages for which we see a need are Spanish, Russian and Chinese.

For 2020, 5,875 calls were placed to Language Line for the Emergency Medical Department. Some of these calls may have not directly been connected to Language Line due to disconnect and or errors. Some of the 911 calls that are transferred from NYPD already have an established connection with Language Line so that is also not accounted for in this number.

In addition, general statistics show that some of our services are more frequently provided in the City's minority and economically distressed communities that may have larger LEP populations. EMS has reported that they use the Language Line most frequently for Spanish, Chinese and Russian.

### **FACTOR 3: THE IMPORTANCE OF THE BENEFIT, SERVICE, INFORMATION, OR ENCOUNTER TO THE LIMITED ENGLISH PROFICIENT (LEP) PERSON**

The agency offers LEP assistance, on as needed basis, to the people while providing the above services.

When an applicant/client calls, visits or encounters FDNY's office(s), or when FDNY employee enters applicants' premises (whether its work or home) language must not be a barrier to the receipt of appropriate services.

This Language Access Implementation Plan reflects FDNY's commitment to providing language access services and meeting the following over-arching goals to:

- Ensure that language is not a barrier to FDNY services;
- Ensure that all applicants and clients have equal access to the services for which they are eligible, regardless of the level of their English proficiency;
- Inform all FDNY applicants and clients that free interpretation services are always available; and
- Train front-line staff on the importance of ensuring access to free interpretation services for all LEP clients.

### **FACTOR 4: THE RESOURCES AVAILABLE TO THE AGENCY AND THE COST OF PROVIDING VARIOUS TYPES OF LANGUAGE SERVICES**

The FDNY uses bilingual staff and the Language Line to speak with our clients in their preferred language.

06/28/2021

FDNY employees assist members of the public on the ground floor of the FDNY headquarters. Individuals come to the public section of the building to submit plans and/or paperwork, take exams for Certificates of Fitness, and/or request fire reports.

Further, the Public Certification Unit provides 2 telephone lines to reach the Language Line. FDNY staff has been trained to use the Language Line. Additionally, the location has stationary signs in the following seven languages:

- Spanish
- Italian
- Creole
- Chinese
- Russian
- Arabic
- Korean

FDNY's Public Certification waiting area has an electronic LCD monitor that plays a slideshow (loop); it's installed to display relevant information in different languages for the applicants coming in and waiting to take an exam.

One of the slides informs the applicants that if they have an English language difficulty; the exam may be read to them by one of the COF employees. Another slide shows that interpretation services are available free of charge, upon request.

Signs that describe the services the FDNY provides are posted on the 1<sup>st</sup> floor. The agency will obtain more signs in accordance with Local Law 30.

Outside vendors provide professional interpretation and translation services. FDNY has contracted services with several different vendors (ex. Geneva Worldwide) to professionally translate written materials (popular material from FDNY website as well as other useful brochures) into Local Law 30 required languages. We expect to have materials translated on an ongoing basis and will continue to translate FDNY resources into 2019. Translated materials are proofread for accuracy before becoming a final document. FDNY coordinator will be in constant contact with parties implementing the Language Access Implementation Plan. Local Law 30 requires agencies to submit annual reports to track compliance.

The Public Certification Unit hired greeters that are highly trained to provide customer service to all applicants, including LEP.

FDNY Bureau of Fire Prevention field inspectors were all given smartphones before end of 2016. Field inspectors use these smart phones for the Language Line, as needed.

## **VI. PROVISION OF LANGUAGE ACCESS SERVICES**

The FDNY provides language access services via multiple channels:

IN WRITING/ON FDNY WEBSITE:

- The FDNY commonly distributed documents that are translated into the Local Law 30 designated languages. The FDNY also provides helpful emergency preparedness information which is translated to ten (10) languages. Further, important forms are also translated into different languages to assist LEP customers. The FDNY is in the process of reviewing and revising forms and documents previously generated by the FDNY to ensure that they meet plain language standard.
- FDNY translated documents that are currently available on the agency's website. Priority in translating is given to the documents that are viewed and downloaded most frequently.
- Public Certification Unit employees have been trained to write study materials and exams that are administered to the public in plain English language. The material is written in simple sentences that are easy to read and understand.
- The NYC Fire Code requires that certificate of fitness applicants have a reasonable understanding of the English language and be able to answer satisfactorily such questions as may be asked of such applicant upon his or her examination. While all the exams are given in English, we provide dictionaries and allow applicants to bring their own dictionaries for the Certificate of Fitness exams; and make every reasonable accommodation to LEP customers.
- The FDNY utilizes Language Line to write and proofread the translated pamphlets for small businesses owners. Field inspectors provide the materials with useful information in different languages to small business owners as well as to the public; as needed.

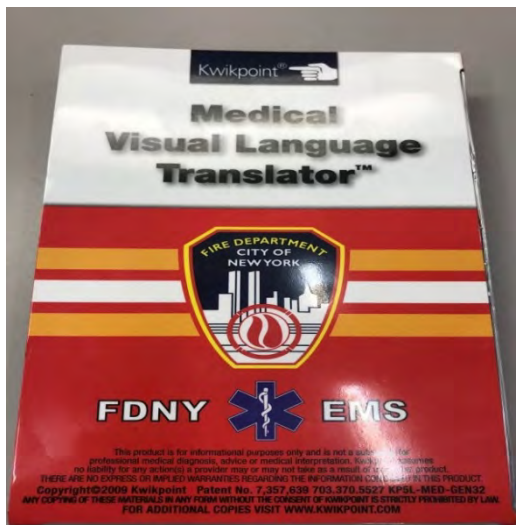
SERVICES DURING EMERGENCY DISASTER:

- In case of broad-scale emergency response, the FDNY will work with NYC Emergency Management on instructions for NYC residents and visitors.
- For extended operations, events that affect multiple areas in the city, federally declared disasters, and notice events, FDNY will participate as needed within the City's emergency response structure, including working with the interagency Language Access Task Force.
- As needed, FDNY will activate its Continuity of Operations (COOP) plan to ensure continued services for all New Yorkers.
- FDNY continued to provide a range of services for the NYC community throughout the COVID-19 pandemic to advance its mission to protect life and property.

IN PERSON:

- FDNY Inspectors and employees who greet the public at the Public Certification Unit have access to the Language Line interpretation services.
- FDNY employees can obtain an interpreter by the phone to assist LEP customers in their native language. The Language Line currently offers interpreters for over 100 languages.

- In addition, multilingual FDNY staff may communicate with LEP customers who require basic assistance.
- FDNY displays an electronic presentation of Language Access policies in 10 different languages.
- Voter registrations hard copies are available in 5 languages and are presented in the Public Certification Unit in the waiting room, upon request. Voter registrations electronic copies are available online in 11 additional languages.
- The FDNY provides free interpretation for rule hearings, upon request. The interpretations will be provided by the Language Line. Although the hearing notice is provided in English, it is noted that free interpretation is available. Most of the individuals who represent businesses and building owners who receive the hearing notices speak and read English. The representatives typically understand the notice without interpretation.
- During fire or medical emergencies, FDNY staff has image cards to help customers identify common problems by pointing to a specific picture. See screenshots of the booklet below.



## **VII. TRAINING**

All front-line staff who provide services to customers are trained. FDNY employees speak numerous languages and can communicate with LEPs as needed.

Supervisors train their front-line staff on how to properly assist LEP customers. In addition, employees are trained on how to use the Language Line services, through the special dual handset or via mobile phones in the field.

## **VIII. RECORD KEEPING AND EVALUATION**

### **A. RECORD KEEPING**

The FDNY tracks the use of all of our language access contracts, including the use of telephonic interpretation, on-site interpretation and written translation by program and location. The FDNY also gathers data on bilingual staff, whether they self-report as bilingual or are certified as bilingual through the selective certification process.

Language Line provides reports upon request summarizing the call duration, the language interpreted, as well as other metrics.

The data provided from the Language Line also shows that top 3 requested Language Line languages for the year were Spanish #1, Russian#2, and Mandarin #3, the rest of the languages fluctuated (as shown in the figure on the right).

### **B. EVALUATION**

The FDNY produces various monthly and annual reports on telephonic interpretation, on-site interpretation, bilingual staff assistance and written translation services. These reports are reviewed by the FDNY and program leaders and compared to general service provision levels. The FDNY monitors the quality of our services through a variety of channels.

- On-site spot checking by program staff;
- Monitoring by the Mayor's Office;
- Feedback received via 311;
- Via community organizations;
- A customer service surveys conducted by the Office of Quality Assurance;
- Federal, state and local audits.

### **LANGUAGE ACCESS COMMITTEE**

During implementation, the Language Access Plan will be reviewed on as needed basis by the Language Access Committee.

#### **The Language Access Committee:**

- Steven Ertrachter
- Jason Shelly.
- Fabricio Caro
- Nicole Simmons
- Aja Cox

The Language Access Committee will meet to ensure each unit of the agency continues to abide by the Language Access guidelines, and that new policies and procedures are adequately addressed.

**THE LANGUAGE ACCESS COMMITTEE WILL LOOK FOR:**

- ✓ Effectiveness of existing language assistance to LEP persons;
- ✓ Identifying additional written materials that require translation on the FDNY internet website;
- ✓ Identifying additional written materials that require translation at the headquarters;
- ✓ Fluctuations in a program's LEP population;
- ✓ Correspondence from NYC residents regarding Language Access Line (such as: Have there been compliments/complaints?)

**IX. RESOURCE ANALYSIS AND PLANNING**

The agency will address the changing needs on language access on as needed basis. The Language Access Committee members will evaluate current issues and develop plans which will solve the problems at hand. The group discussion between committee members will occur during meetings which are projected to occur on as needed basis.

- The FDNY will continue the services with existing vendors.
- The FDNY will continue translating most of the most commonly distributed documents into the Local Law 30 ten required languages.
- Since 2015, the FDNY Phoenix Society has organized Mandarin classes. These classes, funded by the FDNY Foundation, are open to all active and retired FDNY members. These voluntary weekly classes focusing on conversation are meant to facilitate communications between FDNY members and the public. Firefighters, EMTs and paramedics learn Mandarin through this initiative. We will consider what other programs can be offered going forward to expand knowledge and educate our staff. Currently this program is on hold due to Covid-19. Additional funds will be required for more FDNY employees to attend the DCAS certified "writing in plain English" course. We will consider alternatives to that course.
- We will also require additional funds for translating English material into Local Law 30 required languages. Funding amount is not clear as the number of documents that need to be translated are rapidly increasing.

**X. OUTREACH AND PUBLIC AWARENESS OF LANGUAGE ACCESS SERVICES**

The FDNY will post translated materials on its website. More importantly it has video files for public to view as well. Facebook, Instagram and Twitter are also used to make sure information can be widely viewed by many audiences.

Under the Education section on FDNY website, there is a Public Service Announcement header, which presents an initiative agency is currently running “Close the Door PSA”, which is interpreted and said in different languages in the video. With the basic message that when it comes to fire safety, the message is the same in many languages – “CLOSE THE DOOR” <http://www1.nyc.gov/site/fdny/education/fire-and-life-safety/public-service-announcements.page>

FDNY employees distribute materials in different languages during public events. FDNY inspectors continue to deliver important fire prevention and regulation requirements translated in different languages to businesses during site visits and inspections.

**XI. LANGUAGE ACCESS COMPLAINTS**

All 311 complaints are routed through the Commissioner’s office and are directed to specific unit to address each issue.

Further, if any FDNY Language Access issues are reported to 311, an e-mail is sent to Angel Scott, FDNY employee who would forward it to Language Access Committee. There has not been any complaints or requests via 311 for 2020.

Any issues received will be evaluated on case by case basis with the Language Access Committee before they are brought up to department heads.

**XII. IMPLEMENTATION PLAN LOGISTICS**

<u>Language access goal</u>	<u>Milestones</u>	<u>Responsible staff</u>	<u>Deadline</u>
Agency wide awareness	Issue FDNY directive to all staff	Language Coordinator	In process
Provide agency-wide customer service training	Training new and non-new inspectors and non-inspectors-annually. Approximately 600 people.	Jesus Martinez (Bureau of Fire Prevention, Training)	Currently conducted
Identifying all commonly distributed documents	Working with all the units to identify commonly used materials	Language Access Committee	Ongoing
Translating commonly distributed documents into 10 LL required languages	Working with Public Certification Unit to identify most commonly used public information	Language Coordinator	Ongoing
Tracking how language services are being provided	Working with coordinator for the 311 Language Access complaints and requests	Language Access Committee	Ongoing

# Language Access Implementation Plan (2021)

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## I. Agency name and agency language access coordinator

- New York City Department of Housing Preservation and Development
- Robert Turbiak, Director of Operations Human Resources
  - [TurbiakR@hhpd.nyc.gov](mailto:TurbiakR@hhpd.nyc.gov)
  - 212-863-8351
  - <https://www1.nyc.gov/site/hpd/about/language-access.page>

## II. Agency mission and background

The New York City Department of Housing Preservation and Development (“HPD” or “the Agency”) is the largest municipal housing preservation and development agency in the nation. The Agency's mission is to make strategic investments that will improve and strengthen neighborhoods while preserving the stability and affordability of our existing housing stock.

HPD is responsible for:

- Financing the new construction and preservation of affordable housing;
- Ensuring that the entire city's housing stock meets the health and safety requirements of the city's Housing Maintenance Code;
- Monitoring the fiscal health and ongoing affordability of close to 5,000 properties containing nearly 150,000 units in HPD’s Asset Management and Mitchell Lama portfolios; and
- Providing more than 37,000 households with rental subsidies (vouchers) that allow those families to afford a stable place to live.

Encompassing over 2,500 employees and over 40 divisions, HPD works with a variety of private, public, and community partners to strengthen neighborhoods, enable more New Yorkers to become homeowners, or to rent well-maintained, affordable housing. Currently, the Agency provides telephonic, document translation and in-person interpretation.

## III. Agency language access policy and goals

The goal of all of HPD’s language access efforts is to ensure that all Limited English Proficient (“LEP”) persons have equitable access to the Agency’s services. To ensure that language is not a barrier to Agency services, HPD has in recent years prioritized training front-line staff, translating our website, public-facing online consumer systems, and essential documents into the most commonly spoken languages of our service population, and making translators and translation services available throughout the Agency. HPD recognizes this is an ongoing process and is committed to continuously improving its provision of language access services. The Agency will continue on an on-going basis to identify documents that are most commonly distributed to the



public that contact or elicit important and necessary information regarding the provision of basic city services. In addition, the Agency will continue to provide language services in the ten designated Citywide languages. Additionally, by pulling quarterly data from our Language Access services HPD can make the determination to expand beyond the ten designated Citywide languages as needed.

#### **IV. Agency language access accomplishments and progress on goals from previous LAIP**

The Agency's Human Resources' Division will be primarily responsible for guiding implementation of the 2021 Language Access Plan ("Plan"). Human Resources will work in conjunction with language access liaisons from the Agency's divisions to implement this Plan which are developed and facilitated by Human Resources. Human Resources will report to the First Deputy Commissioner on progress toward these goals on an ongoing basis and will update the Plan once every three years to reflect the Agency's progress and next steps.

- Addition of The Big Word for In-person Interpretation
- Addition of Voiance for two-way phone interpretation to our clients
- Developed Section 8 based training module for staff/client interaction

#### **V. LEP population assessment**

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

HPD's service area covers all five boroughs and the eligible service population includes all New York City residents.

According to the Mayor's Office of Immigrant Affairs, the top ten (10) languages spoken by LEP persons in New York City are Spanish, Chinese (including Cantonese, Mandarin, Formosan), Russian, Korean, Bengali, Haitian Creole, Arabic, Urdu, French and Polish. Nearly 25% of New Yorkers are considered Limited English Proficient (LEP), which means they have a limited ability to read, speak, write or understand English.

##### ***Factor 2: Frequency with which LEP individuals come into contact with HPD programs***

The Agency regularly interacts with New Yorkers seeking or receiving rental subsidies, renters and building owners, contractors working on HPD projects, construction workers working on HPD projects, and developers doing business with the City. Although there might be small differences by program area, the demographics of HPD's service population closely mirror that of the city as a whole.

The Agency has a wide range of programs that require interaction with LEP clients on a daily basis. The frequency varies greatly among divisions, it could be in-person, telephonic or public events in communities. The Agency's primary frontline divisions, the Division of Tenant Resources, Section 8 Appeals, and the Office of Enforcement & Neighborhood Services, interact with LEP persons from across the top ten languages multiple times per day. Some divisions interact rarely, if ever, with LEP persons.

The Agency is able to track interactions in most divisions by analyzing language service provider data and/or division intake forms. However, in some divisions such as the Division of Tenant Resources, we are unable to track exact interactions since some language services are provided through internal employees that speak other languages.

**Factor 3: Importance of the benefit, service information or encounter of LEP individuals**

As discussed above, HPD provides a wide range of programs and services. The nature and importance of these programs and services varies by office and division. The chart below describes the programs and services the Agency provides, the frequency with which LEP persons interact with such programs and services, and the significance of each program and service to the LEP population, by office and division.

Office/Division	Core Public-Facing Service	Frequency of Interaction With Public/LEP Persons	Level of Importance to LEP Population
Division of Human Resources	Provides signage for HPD facilities.	Rare	Moderate
Office of HPD Tech	N/A	Rare	Low
Office of Enforcement & Neighborhood Services	Responds to complaints filed with NYC 311 regarding lack of essential services; orders and monitors the performance of emergency repairs in privately-owned buildings in response to immediately hazardous violations; provides training and outreach to property owners and communities; bring cases in Housing Court to enforce compliance with the housing quality standards contained in the New York State Multiple Dwelling Law and the New York City Housing Maintenance Code.	Multiple times per day	High
Office of Asset and Property Management	Manages and maintains city-owned residential and commercial properties; ensures the longevity and affordability of units the Agency has created and preserved; oversees the portfolio of city-sponsored Mitchell-Lama developments; implements the Senior Citizen Rent Increase Exemption (SCRIE) program for Mitchell-Lama and other subsidized developments; administers the Emergency Housing Services (EHS) program for households displaced by fire or	Multiple times per day	High

	city vacate order; assists homeless households in securing permanent affordable housing; provides intake, case management and rehousing assistance for disaster-area evacuees; oversees the marketing and lottery process for affordable units.		
Office of Financial Management	N/A	Rare	Low
Division of Tenant Resources (within the Office of Financial Management)	Administers rental assistance programs including Section 8, Shelter Plus Care, and Moderate Rehabilitation.	Multiple times per day	High
Office of Policy and Strategy	N/A	Rare	Low
Division of Communications	Assists in writing, vetting, and editing website and other communications channels; manages Agency social media accounts.	Several times per week	Moderate
Division of Regulatory Compliance (within the Office of Policy and Strategy)	Responds to fair housing complaints; assists contractors, vendors in navigating statutes, rules & regulations; conducts outreach to M/WBE vendors and contractors; monitors compliance of contractors and investigates potential wage violations on behalf of construction workers.	Daily	High
<b>Office/Division</b>	<b>Core Public-Facing Service</b>	<b>Frequency of Interaction With Public/LEP Persons</b>	<b>Level of Importance to LEP Population</b>
Office of Neighborhood Strategies	Leads HPD's engagement with tenants and landlords, community leaders and owners to identify concerns and strategies for neighborhood development and collaborates with developers to plan inclusionary housing.	Several times per week	Moderate
Office of Development	Works with developers of affordable housing; monitors progress and construction quality on construction sites.	Rare	Low
Office of Legal Affairs	N/A	Rare	Low
Division of Landlord Tenant Litigation	Communicates with residential and commercial tenants of City-owned properties and with persons serving legal papers on HPD.	Daily	High

(within the Office of Legal Affairs)			
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**Factor 4: Resources designated by agency for language assistance services**

HPD allocates a combination of financial and personnel resources to the provision of language access services, some of which are restricted for use by specific programs, and others which are available for use throughout the Agency. HPD has three multi-year contracts for document translation, on-site interpretation, and telephonic interpretation. HPD has also secured private grants to support the provision of language access services, such as for the translation of the Housing Connect website. Expenses associated with the provision of language access services, such as printing and signage costs, are typically folded into the general budget for each program area. In addition, the Agency dedicates personnel resources to training, data collection, monitoring, interpretation, and translation conducted outside of the Agency’s contracts (either by program-area employees or volunteers through the city-wide Volunteer Language Bank).

Based on the Agency’s analysis of the frequently requested languages, we are providing telephonic interpretation beyond the top ten (10) languages issued by the Mayor’s Office of Immigrant Affairs. The Agency’s assessment does not allow for document translation beyond the designated ten (10), based on the four factor analysis and available resources. However, all documents are mailed out with a “Language Assistance” coversheet to assist LEPs to request documents in their preferred language.

As set out in the Agency’s current Language Access Plan, one of the ongoing priorities is to standardize data collection and the tracking of language services across programs to help improve language access services in 2021.

**VI. Provision of language access services**

HPD’s public-facing divisions interact with different members of the public in a variety of settings. These interactions may happen:

- In person at HPD offices;
- In person during field interviews, inspections, public meetings and community events;
- By phone;
- By mail or email; and
- Through HPD’s website, public-facing online systems, and social media.

As a result, HPD and its employees must tailor the provision of language access services to a wide range of settings. The Agency will continue to rely on a combination of interpretation and translation services to meet the needs of LEP persons and ensure they have equal access to HPD’s services. Some of these services will be provided by HPD employees and others by vendor contract.

Employees will determine the appropriate type of language access services depending on the nature of the interaction, in consultation with resources available to each division.

### ***Translation Services - Written Communication and Materials***

In accordance with DOJ guidance, HPD prioritizes vital and/or commonly distributed documents for translation. A document will be considered vital and/or commonly distributed if it contains information that is critical for accessing the Agency's programs or activities, or is required by law. Vital documents may include:

- Documents that must be provided by law;
- Complaint, consent, release or waiver forms;
- Claim or application forms;
- Conditions of settlement or resolution agreements;
- Letters or notices pertaining to the reduction, denial, or termination of services or programs or that require a response from the LEP person;
- Time-sensitive notices, including notice of hearing, upcoming grand jury or deposition appearance, or other investigation or litigation-related deadlines;
- Form or written material related to individual rights;
- Notice of rights, requirements, or responsibilities; and
- Notices regarding the availability of free language assistance services for LEP individuals.

The managers for each division or office will facilitate a review of its programmatic notices to determine which may be considered vital. Notices which are regularly sent and/or will be sent to a large number of recipients will be reviewed individually. All other notices, including those sent on an individual basis, will be grouped and categorized as vital or non-vital based on their purpose.

To ensure maximum accessibility of these documents, HPD will conduct the following processes.

#### Translate Written Documents

For each new notice or group of vital notices, or any such notices that undergo a substantial revision, managers from that division will make an initial determination as to whether the written document can and should be made available in other languages.

All vital documents will be translated. Vital documents will be translated into:

- The top ten languages spoken by LEP persons within the Agency's client service area;
- The most-frequently encountered languages of LEP groups eligible to be served or likely to be affected by the benefit, program or service, based on program-specific data; or
- The primary language spoken by the recipient, if known.

Non-vital documents may be translated, at the Agency's discretion, based on an evaluation of:

- The nature of the written document;
- The size of the potential target audience;

- Whether the primary language of the potential target audience is known;
- The time and resources available for translation; and/or
- Upon request.

Whenever possible, boilerplate language regarding translations services will be incorporated into written communications:

“If you would like assistance in a different language, please check this box. For assistance in completing this package, please call 212-863-XXXX.”

The Agency plans to distribute translated documents to targeted audiences by use of our vendor Language Line, at the Agency’s discretion, based on an evaluation of:

- The nature of the written document;
- Whether the primary language of the potential target is known;
- The time and resources available for translation; and/or
- Upon request.

For divisions that interact with LEPs on a more frequent basis, which may include daily to several times per week will have commonly distributed documents available for their target audience. However, due to limited resources and storage restraints, the Agency is not able to have all commonly distributed available to all top ten (10) languages, but will have them available upon request.

#### Consistently Conduct Quality Assurance Reviews

To ensure the quality of the Agency’s communications, whenever possible, all translated documents will be reviewed by at least one employee who is fluent in the language used in the notice, and who was not involved in drafting the notice. Members of the volunteer language bank will be asked to assist in the review as needed. The quality assurance review process will be managed by the Division’s manager to ensure consistency and quality.

#### Encourage Use of Plain Language

To help ensure that vital notices are understandable throughout HPD’s service population, the Agency will establish a training curriculum that teaches relevant employees how to incorporate the tenets of plain language into written materials and presentations. The Agency has also initiated a plain language review of all critical notices related to our Section 8 rental subsidy program, which assists over 37,000 households.

As part of the ongoing training curriculum, the Agency plans to provide guidelines on plain language. With this training, managers are expected to understand the importance of providing commonly distributed documents by using the following simple rules:

- Use short words and sentences;
- Front-load important information;
- Break up content with lists and headers;
- Use the active voice;

- Cut unnecessary words;
- And avoid jargon.

### *Online Communication*

HPD also interacts with the public via our recently redesigned website. The website is now accessible in 91 different languages, through Google Translate.

Additionally, HPD maintains NYC Housing Connect, an online application system for affordable housing lotteries. Translated instructional materials are now available on Housing Connect. Paper applications are currently available by request to the developer.

The Agency makes efforts in providing important forms and resources in English and Spanish, and will continue to translate vital and commonly distributed forms in the top ten (10) languages.

### ***Interpretation Services - In-person Interpretation***

HPD employees frequently interact with members of the public in person at all HPD offices and through scheduled and emergency field and site visits. When possible, the Agency's public-facing divisions will make bilingual employees or volunteers from the NYC Volunteer Language Bank available to interpret for LEP persons visiting HPD's offices. When a bilingual employee or volunteer is not available for interpretation, HPD employees will rely on the Big Word for interpretation. HPD can track the languages requested by a monthly report from the Big Word in order to better assist the public. Public-facing staff members who frequently interact with members of the public have access to Big Word portal in their service areas and can easily use the Big Word to accommodate LEP persons during in-person interactions. When the LEP person expresses a preference, HPD employees may rely on a friend or relative of the person seeking services to interpret.

In-person interpretation is also necessary on a regular basis for field or site visits. These visits frequently involve housing maintenance code inspections, interviews of HPD's housing subsidy recipients, public events and construction site investigations. Employees conducting such visits will attempt to determine language interpretation service needs in advance based on the recipients records to see if there is a preferred language listed. When possible, and depending on the nature of the visit, the Agency will make an effort to send a bilingual employee who will be able to conduct or interpret interviews or inspections in the language primarily spoken by the LEP person. When a bilingual employee is not available, field employees will use language translation cards to indicate the purpose of their visit and offer interpretation services. If necessary, employees will use the Big Word to communicate with the LEP person during the interview or inspection. When the LEP person expresses a preference, HPD employees will rely on a friend or relative of the person seeking agency services to interpret.

HPD employees will use a variety of formal and informal methods to identify an LEP customer's primary language. Posters and digital signage throughout our client services area and field offices advertise the availability of free language services in various languages, encouraging LEP persons to request assistance. HPD employees will also offer language access services, where appropriate, and will use posters and "I speak" cards to help determine which language services might be appropriate.

### ***Telephonic Interpretation***

HPD employees are often contacted by phone by parties interested in the Agency's services. Many of the employees in the Agency's public-facing divisions who answer phone calls from members of the public are bilingual. When a bilingual employee, fluent in the language of the LEP person seeking assistance, is not available for interpretation, HPD employees will rely on the Voiance for interpretation. Employees who frequently interact with members of the public have access to Voiance phone lines in their service areas and can easily use the Voiance line to accommodate LEP persons by phone.

The Agency is currently contracted with Voiance vendor, who is providing over 173 languages in addition to any other languages the Agency may request.

#### Emergency Response

In the event of an emergency, HPD would use our existing contracted language access services. Additionally, bi-lingual Residential Building Assessment Inspectors and other staff would be mobilized. If it is a large incident, the Language Access Interagency Task Force will be activated at NYC Emergency Management (NYCEM), and requests can be funneled through NYCEM.

### **VII. Training**

HPD will develop a general training curriculum for all new and existing applicable employees to cover the tenets of good customer service and best practices for serving the Agency's varied constituencies. The trainings will specifically familiarize staff with the requirements and availability of resources pertaining to language access and limited English proficiency and help HPD standardize the provision and tracking of language access services. Trainings will be prioritized for staff in program areas that most significantly interact with the public and/or produce materials for public communication. Training will be provided to new staff and to existing front-line staff on a quarterly basis.

Tailored, program-specific trainings will also be developed and implemented depending on the needs of the division. Also, in response to Language Access Secret Shopper's report scores, HPD may provide additional refresher sessions for the locations visited by the shoppers.

All general language access training will be conducted by the Human Resources Training and Development team, who then tracks staff and division participation.

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

HPD will use vendor portals to capture and analyze the language services provided across the Agency. Tracking will include:

- Standardized quarterly reports from public-facing operations on general usage of and need for language access services;
- Quarterly assessment of Language Volunteer Bank usage;
- Quarterly assessment of third party contract usage;
- Review feedback on quality of interpretation services and provide feedback to vendor.

In order to ensure high quality language access services are provided, HPD requires the following "best practices" of all programmatic areas:



- All third party vendors used for interpretation and translation are Agency-approved; and
- All translated materials are reviewed internally whenever possible before implementation.

Additionally, HPD provides the opportunity for customers to complete a satisfaction survey in our Section 8 Customer Services center. Moving forward, HPD will seek feedback on the quality of language access services provided, if applicable. HPD also carefully reviews “Secret Shopper” scores to assess and address any issues with the services provided, and will closely review and address any language access complaints received by 311.

All reports, complaints and feedback will be regularly monitored by the Agency’s Language Access Coordinator and Human Resources, who will make policy and operational recommendations accordingly to ensure ongoing compliance.

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

HPD will continue to allocate Agency resources, as described above, and seek out additional opportunities to leverage private and community funds to ensure language access. In addition, the Agency will seek to provide additional training resources, hire additional bilingual staff for front-line positions, recruit and refer volunteers for the NYC Volunteer Language Bank and distribute information to ensure that program areas are aware of all of the resources available within the Agency and throughout the city.

By way of contracts, the Agency will continue to centralize all services through our vendors to ensure consistent quality language access services. The Agency will closely monitor the usage of language access to identify and close gaps in access service.

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

HPD currently employs a multi-pronged approach to ensuring the public is aware of language access services. Outreach efforts including signage (posters and digital boards), website features, and incorporation into relevant programmatic materials and communications. Over the next years, HPD will focus on expanding the Agency's public outreach strategies as follows:

- Signage - HPD will improve existing signage to better engage the public and make it easier to navigate our public spaces. This initiative will include consistent, branded lobby signage for 100 Gold Street and our five field offices, and language access signage for all customer service areas.
- Website/Social Media - In addition to offering content in multiple languages, HPD will clearly and consistently articulate the availability of language access services through these mediums.
- Marketing Materials
  - HPD will create a general handout summarizing the availability of language access services. The handout will be available for multi-purpose use, including distribution at customer service centers and program/community events.
  - HPD will increase emphasis on incorporating language access information into programmatic materials and notices where applicable.

## **XI. Language Access complaints**

Language access complaints from NYC 311 will be routed through the First Deputy Commissioner's office to the appropriate program area for response. The Language Access Coordinator will track, monitor and respond to language access complaints whether through 311 or internally, for the Agency. The Language Access Coordinator will also be responsible for including that information on complaints as part of the annual agency reporting.

## **XII. Implementation plan logistics**

HPD initially convened an intra-agency working group in the summer of 2006 to address language assistance needs and implementation of services. Since that date, the task force has successfully increased the visibility and availability of interpretation and translation services and coordinated the provision of LEP services among our most public-facing operations, including the Section 8 program which assists over 37,000 households annually with rent subsidies, and the Office of Enforcement and Neighborhood Services, which ensures the entire city's housing stock meets the health and safety requirements of the city's Housing Maintenance Code.

In 2015, HPD reorganized its language access working group. The core working group includes representatives from the office of the First Deputy Commissioner, Regulatory Compliance, and Legal Affairs. Additionally, every office or division within HPD has designated a language access liaison to collaborate with the working group.

The roles and responsibilities of the working group include:

- Maintain and update the Plan every two years
- Oversee implementation and execution of the Plan
- Collaborate with city stakeholders on LEP initiatives
- Coordinate with all Agency divisions to
  - Standardize LEP policies, procedures and staff training;
  - Facilitate LEP data tracking, collection and analysis;
  - Ensure awareness of language access resources, requirements and best-practice standards;
  - Develop policy and resource recommendations as needed to better enable language access across all public-facing operations; and
  - Recruit additional volunteers for the NYC Volunteer Language Bank.

In 2017, HPD moved the language access initiative into the Division of Human Resources, in the Office of the First Deputy Commissioner. All aspects of language access roles and responsibilities are managed in Human Resources.

HPD is committed to continuously improving its provision of language access services. The Agency has prioritized the following goals for our 2021 Language Access Plan:

Language Access Goal	Milestones	Responsible Staff	Deadline
Provide telephonic interpretation services in at least 100 languages	Review all languages provided by telephonic vendor	Language Access Coordinator	End of December 2021
Standardize training across divisions	Review current training	Language Access Coordinator; Director of Training and Development	4th Quarter 2021
Create LEP-specific emergency plan	Review current employee emergency plan	Language Access Coordinator; Emergency Preparedness Team	4th Quarter 2021
Increase use of plain language in essential public documents	Create plain language training for divisions that send out public documents	Language Access Coordinator; public facing Division heads	4th Quarter 2021
Create marketing materials to promote	Create sample documents for review.	Language Access Coordinator, Assistant	4th Quarter 2021

and encourage translation.		Commissioner of Human resources	
Create intranet content to assist front line employees and managers with additional language access resources	Work with HPD Tech (IT department) to create an internal site for employees to access.	Language Access Coordinator; Assistant Commissioner of Human Resources; and IT department	4 <sup>th</sup> Quarter 2021
Identify an internal tracking system to capture all language access requests	Look at creating an internal tracking method/mechanism	Language Access Coordinator; Division Managers	On going
Identify and translate most-commonly used documents distributed to the public	Review all most-commonly used documents	Language Access Coordinator; public facing Division heads	On-going

Robert Turbiak, Director of Operations, Human Resources will serve as the Language Access Coordinator for HPD. He will report to the Assistant Commissioner of Human Resources and the First Deputy Commissioner on progress toward these goals on a quarterly basis.

# The New York City Law Department

## LANGUAGE ACCESS AND IMPLEMENTATION PLAN

I. Name and Title of Language Access Coordinator: **Sosimo Fabian, J.D., Ph.D.**  
**Chief Diversity & EEO Officer**  
**Tel. No.: 212-356-7110**  
**Email: [sfabian@law.nyc.gov](mailto:sfabian@law.nyc.gov)**  
**May 18, 2021**

### II. Agency Mission and Background:

The New York City Law Department's lawyers and support professionals work to pursue justice while providing the City with the highest quality legal representation. The Law Department represents the City, the Mayor, other elected officials, and the City's many agencies in all affirmative and defensive civil litigation as well as in juvenile delinquency proceedings brought in Family Court, and Administrative Code enforcement proceedings brought in Criminal Court.

The Corporation Counsel for the City of New York has a special responsibility for the pursuit of justice, while serving the long-term institutional interests of the City. Justice is demonstrated not only in the manner in which we advocate and counsel clients, but is also demonstrated in how the Law Department's operations are managed. Our external legal work and our internal work environment both must continue to reflect our core values: a commitment to public service, excellence, integrity, diversity and justice. To that end, the Law Department is committed to ensuring that it provides equal access to services and seeks to continuously improve language access for its limited English proficient (LEP) clients.

### III. Agency Language Access Policy and Goals:

The overall goal of the Law Department Language Access Plan (LAP) is to provide language access services so that persons with limited English proficiency (LEP) have meaningful access to the information provided by the Law Department's direct public services.

Part of this goal is to provide a welcoming environment to LEP persons, including an environment that makes it easy for employees to communicate with members of the LEP community. The Law department will work towards providing seamless communication with LEP persons. The Law Department has the capability of providing interpretive services in many languages. See Exhibit A.

### IV. Limited English Proficient Population Assessment:

The Family Court Division of the New York City Law Department is the most likely to provide direct public services. The Family Court Division promotes the well-being and best-interest of the City's children that, for a mirage of reasons, find themselves within the Juvenile Justice System while balancing the need to protect the public. The Division also establishes orders of child support and paternity on behalf of out-of-state custodial parents from City residents, and assists custodial parents who live in the City to file for child support from parents who live

outside the state and the country.

Historically, the five most common languages requested by the Family Court Division were Spanish, Chinese-Mandarin, Bengali, Russian and Arabic. See Exhibit B. Notably, while these are the most popular languages others can be provided.

**V. Provision of Language Access Services:**

**REQUESTING “LIVE” INTERPRETER SERVICES**

When a “live” interpreter is required, the attorney handling the matter must send an email to “[StenosNYC@law.nyc.gov](mailto:StenosNYC@law.nyc.gov)”.

The email must include the case name, case number (Docket #, if no docket #, then the FCD#), date, time, location, type of service (live interpreter) and language, as well as the name and telephone number of the Assistant Corporation Counsel (ACC) making the request.

1. The email request must be sent to “[StenosNYC@law.nyc.gov](mailto:StenosNYC@law.nyc.gov)” no later than 3:00 p.m. one day prior to the requested date for the interpreter.
2. If there is a request for special services, such as an out-of-office location, Sign Language Interpreter, and/or special type of Interpreting language (an unusual language), this should be submitted ASAP because advance notification for special services is needed.
3. The ACC must confirm with the Interpreting Coordinator via e-mail (“[StenosNYC@law.nyc.gov](mailto:StenosNYC@law.nyc.gov)”) or by phone ([212-356-3555](tel:212-356-3555)) at the end of the day to make sure each request has been received. Any cancellation should be emailed to “[StenosNYC@law.nyc.gov](mailto:StenosNYC@law.nyc.gov)” at least 2 hours before the activity time to avoid payment of a cancellation fee by the Law Dept.

**REQUESTING “TELEPHONIC” INTERPRETING SERVICES**

When telephonic interpreting is required, the attorney must seek approval to access the services from a supervisor. Once a supervisor has approved, the company the Law Dept. contracts with for these language line services (currently VOIANCE) must be called with the request. The number to call to access these services is currently (866) 998-0338. The attorney should follow the automated instructions once the phone is answered. Callers will be directed to enter the Law Dept.’s account number and then the Law Dept.’s PIN number to access the telephonic interpreting services. The caller will then be told to hold for the next available Client Services Representative. The caller should provide the Client Services Representative with his/her name.

VOIANCE has provided the following instructions for using the “InterpreTalk” system:

- Dial:
- Enter the Law Dept.’s Account number:
- Enter the Law Dept.’s PIN number:

- Give the Client Services Representative your Full Name and make sure that they record it.
- Tell the Client Services Representative what language you need the interpreter to speak.
- Wait on hold momentarily while an interpreter is contacted.
- Listen for the Client Services Representative to return to the line with the interpreter.
- Have the interpreter give you his/her ID number and record this number.
- Give the interpreter a brief introduction of the call.
- Ask the interpreter to dial your LES (Limited English Speaker) at the number you provide.
- Before dialing, you may ask the interpreter to leave a specific voice mail message if the LES does not answer the phone.
- Before the call is connected, remind your interpreter that taking notes during the call is not permitted. If there is an issue, please have the interpreter contact a supervisor at VOIANCE immediately.
- Speak directly to your LES (Limited English Speaker) in the first person - the interpreter will repeat everything that is being said.

#### **REQUESTING THE TRANSLATION OF A DOCUMENT**

To have a document translated, an approval from the Division Chief is required. All approvals can be obtained via email. Once approved, the request is forwarded via email to "[StenosNYC@law.nyc.gov](mailto:StenosNYC@law.nyc.gov)".

When emailing "[StenosNYC@law.nyc.gov](mailto:StenosNYC@law.nyc.gov)" with your approved request, the following information must be provided:

- The document to be translated.
- A word count of the document.
- The date the translation is needed.

#### **INTERACTIVE PROCESS**

In determining which service and or language is needed. Law Department staff will engage in an interactive dialogue with the member of the public to assess the language needed to best serve the member of the public. Additionally, the Agency will post in public places multi-language signage reflecting the availability of interpretation services.

## **VII. Training**

The Family Court Division periodically disseminates instructions on how to obtain translation services. All Family Court Managers know the Law Department and City of New York language access policy.

The New York City Law Department has the capability to provide interpretive services through the NYC DCAS Language Service Contract. Annexed as Exhibit A are the languages for which interpretive services are available.

The Law Department will train staff on its language services access policies and procedures by incorporating as part of the annual EEO training provided. The Training will be conducted by the Diversity & EEO Officer, Sosimo Fabian.

Topics to be covered during the training session will be the rationale for language access, the City's demographics, and the agency's language access policies, resources, standard procedures, identifying customer/clients primary language, reporting requests for language services, use of dual handsets, and the use of telephonic interpreters.

As part of the agency on boarding and yearly EEO training cycle, staff members will be made aware of the requirements mandated by Local Law 30. Additionally, instructions will be provided on how to access the telephonic interpreting services. The population trained will be documented by having the attendees sign in and out of the training session.

## **VIII. Record Keeping**

The agency will track language services quarterly and will maintain records of the language services provided.

The agency will conduct a random sampling of staff that has used language services in the quarter to assess the delivery and quality of its language services.

The Language Access coordinator will track any language request made via 311 or any complaints received as well as the training that is done in furtherance of local law 30.

## **IX. Resource Analysis and Planning:**

The agency currently has a contract for interpretive services which fully permits it to comply with Local Law 30.

## **X. Outreach and Public awareness of Language Access services**

The agency will place on its website the availability of its language assistance services. Furthermore, the agency will post signs in conspicuous places informing the public of the interpretive services that are available. Also, the training that will be provided to Law



Department staff will include encouraging that this services be mentioned as part of the interaction with members of the public.

**XI. Language Access Complaints**

The Language Access Coordinator will monitor all complaints made and will quarterly review all interpretive services requested. The Language Access Coordinator email will be made available and identified as the individual who is responsible for receiving, tracking, and resolving complaints. As part of the quarterly reporting to DCAS any complaints will be reported as well as how they were addressed.

**XII. Implementation Plan Logistics**

The Language Access Coordinator is Sosimo Fabian, Tel. No. 212-356-7110, email: [sfabian@law.nyc](mailto:sfabian@law.nyc).

This Language Access Plan will be implemented by 8/1/2021. It is worth noting that the Law Department has been historically in compliance with these requirements.

The Language Access Coordinator has ensure that all necessary signage are posted in areas where members of the public are able to see it. The Language Access Coordinator will also make sure that the intranet as well as the internet pages for the Law Department that are available to the public contain the pertinent information on how to obtain language access services.

# Language Access Implementation Plan

**Language Access Coordinator:**  
Zodet Negrón  
Director of Communications

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## I. Agency Name and Agency Language Access Coordinator

The Landmarks Preservation Commission (LPC) is the New York City agency responsible for protecting New York City's architecturally, historically, and culturally significant buildings and sites by granting them landmark or historic district status and regulating them after designation.

LPC's Language Access Coordinator is the Director of Communications, Zodet Negrón. This information can be found on the agency's Language Access page <https://www1.nyc.gov/site/lpc/about/language-access.page>.

## II. Agency Mission and Background

### Mission and Background

The Landmarks Preservation Commission (LPC) is the New York City agency responsible for protecting New York City's architecturally, historically, and culturally significant buildings and sites by granting them landmark or historic district status and regulating them after designation. Potential landmarks and historic districts are identified by LPC through surveys and other Commission-initiated research. This may include properties suggested by members of the public.

LPC was established in 1965 when Mayor Robert Wagner signed the local law creating the Commission in order to protect the city's architectural, historical and cultural heritage. The agency consists of eleven commissioners who are appointed by the Mayor and a full-time staff of approximately 80 preservationists, researchers, architects, historians, attorneys, archaeologists, and administrative employees.

There are more than 37,000 designated buildings and sites in New York City, most of which are located in 151 historic districts and historic district extensions in all five boroughs. The total number of protected sites also includes 1,439 individual landmarks, 120 interior landmarks, and 11 scenic landmarks. LPC evaluates and considers dozens of potential landmarks and historic districts each year. Commissioners and Preservation staff approve approximately 14,000 applications for work on designated properties each year.

### Direct Services

As the agency responsible for protecting the City's architecturally, historically and culturally significant buildings and sites, LPC evaluates and considers dozens of potential landmarks and historic districts each year. The landmark designation process includes outreach to property owners, public meetings and public hearings. During public hearings, anyone can testify about a proposed designation before the Commission. The Commission also works with elected officials and community groups to ensure these historically significant sites are preserved for future generations.

In order to preserve its designated buildings and sites, LPC regulates changes made to their significant features. This includes reviewing permit applications and issuing permits for certain kinds of work. For more information on the types of work that require permits go to the permit applications [page](#).

LPC's offices are located in the Municipal Building at One Centre Street, Manhattan. Prior to the pandemic, this was where public hearings and meetings were held, and where applicants dropped off or

picked up applications and permits. Preservation staff would also meet with applicants at LPC's offices. LPC offices have been closed since the pandemic started in March 2020, and all agency staff have been working remotely. Public hearings and meetings are being held virtually via Zoom and all applications are accepted by email and permits issued electronically. The agency is currently working on its return-to-office plans.

Currently, there are four main staff members who serve as the front line with the public: the Receptionist, the Public Information Officer, the Director of Intergovernmental and Community Affairs, and the Intergovernmental and Community Affairs Coordinator.

- The Receptionist is the first point of contact for visitors.
- The Public Information Officer handles cold calls from the public in addition to questions from architects, expeditors, and property owners regarding permits and applications.
- The Director of Intergovernmental and Community Affairs and the Intergovernmental and Community Affairs Coordinator receive correspondence and calls from the public, elected officials, and advocacy groups regarding proposed projects.

The following LPC departments offer direct services to the public:

#### Preservation Department

The Preservation Department reviews permit applications for work on designated properties and communicates with a variety of applicants, including property owners, business owners, architects, contractors, and attorneys.

#### Enforcement

The Enforcement Department investigates complaints about work that may have been performed without LPC permits or in noncompliance with LPC permits and communicates with civic and neighborhood groups, property owners and general members of the public.

### **III. Agency Language Access Policy and Goals**

The Landmarks Preservation Commission (LPC) is committed to providing equitable service to the population it serves, including persons with Limited English Proficiency (LEP). LPC has taken and continues to take reasonable steps to ensure LEP persons have access to the agency's programs and services. LPC's Language Access Provision Plan, which has been in place since 2009 in compliance with Executive Order 120 of 2008, outlines how the agency provides translation and interpretation services on an as-needed basis.

In order to adhere to Local Law 30 of 2017, which expands on Executive Order 120, LPC has developed a Language Access Implementation Plan (LAIP) to reflect the new provisions required under LL30, which include new designated citywide languages. This plan will ensure New York City's diverse population continues to have meaningful access to all of the agency's programs and services.

LPC will update its Language Access Implementation Plan at least every three years and post it on the agency website.

The Director of Communications, who is the agency’s Language Access Coordinator (LAC) will be responsible for overseeing the implementation of the plan and revising it accordingly.

#### **IV. Agency language access accomplishments and progress on goals from previous LAIP**

Since Local Law 30’s inception, LPC has secured contracts with interpretation and translation service vendors, has added a tagline to include in all of its public hearing/meeting agendas and property owner outreach letters translated into the 10 designated citywide languages, has posted new signage (language identification posters) regarding availability of language services in all prominent areas of the office, including reception and the public hearing room, has updated its permit application forms so that they are in plain language, and has trained staff on language access and how to connect with our contracted vendors and distributed language identification cards.

The agency has also translated instructions for participating in virtual public hearings and for filing applications electronically. For community outreach meetings, the agency provides interpretation services and translates presentations and materials when needed.

<b>Language access goal</b>	<b>Update</b>
Secured contracts with interpretation and translation service vendors	Completed
Created tagline and translated it into the 10 designated citywide languages to include in public hearing/meeting agendas and letters to property owners	Completed
Posted new notices (language identification posters) to public regarding availability of language services	Completed
Created an email for the public to submit language access complaints and post on the website	Completed
Trained staff on language access and how to connect with our contracted vendors and distributed language identification cards	Completed

## V. LEP Population Assessment

LPC used the “four-factor analysis” to determine the language access needs of the population it serves.

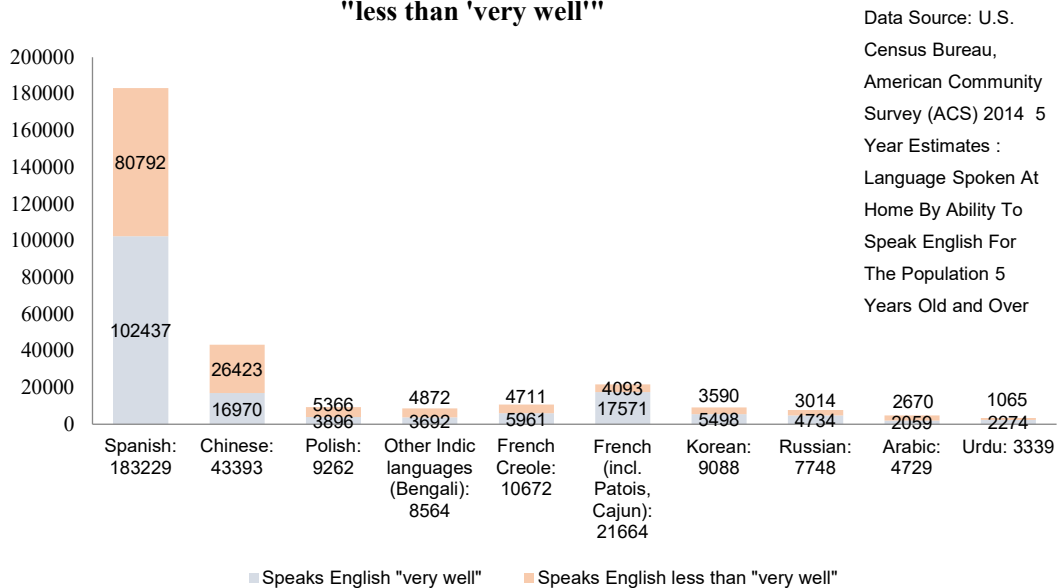
### Factor 1: Number or Proportion of LEP Individuals

LPC used existing agency data and information provided by the Mayor’s Office of Operations to evaluate the language access needs for LEP persons served by the agency.

According to data provided by the Mayor’s Office of Operations and the Mayor’s Office of Immigrant Affairs (MOIA) from the U.S. Census American Community Survey and the Department of Education, the top 10 languages spoken by LEPs in New York are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish. Since LPC works in all five boroughs, we will use these most common languages for any large-scale translations or interpretation needs unless an alternate language is identified for a specific area.

LPC also conducted its own language analysis to determine the primary languages spoken other than English in its designated historic districts. This language analysis utilized 2014 U.S. Census Bureau American Community Survey language data at the census tract level. The Census tracts analyzed were either wholly or partially within the boundaries of designated historic districts with total tracts numbering 257. The ACS dataset – Language Spoken At Home By Ability To Speak English For The Population 5 Years Old and Over – enabled LPC to determine the most commonly spoken languages, as well as the percentages within those language groups that spoke English either very well or less than very well. The population numbers for each language group were totaled and the top 10 languages as identified by the City were isolated and analyzed as a group. See chart below.

**Top 10 Language Groups with Largest Population that Speaks English "less than 'very well'"**



The primary languages spoken by LEP individuals within LPC's historic districts are Spanish and Chinese, followed by Polish, other Indic languages (Bengali), French Creole, French, Korean, Russian, Arabic and Urdu.

## **Factor 2: Frequency of Contact with Agency**

There are more than 37,000 designated buildings and sites in New York City, most of which are located in 151 historic districts and historic district extensions in all five boroughs. The Landmarks Preservation Commission helps preserve these landmark properties by regulating changes made to these buildings and sites. This includes reviewing permit applications and issuing permits for certain kinds of work on designated properties. For more information on the types of work that require permits go to the permit applications [page](#). As such, LPC staff communicates with a variety of permit applicants, including property owners, business owners, architects, contractors and attorneys. LPC also receives and responds to correspondence and calls from the public, elected officials, and advocacy groups regarding proposed projects.

On most Tuesdays each month, LPC holds public hearings and meetings, which are open to all members of the public. Public hearings provide an opportunity for the public to testify in person before the Commission on proposed permit applications for work on landmark properties, or on proposed landmark designations. Public meetings provide an opportunity for the public to observe subsequent discussion amongst the Commissioners on proposed permit applications for work on landmarked properties or proposed landmark designations after the hearing is closed.

Each year, the Commissioners and Preservation staff approve approximately 14,000 applications for work on designated properties. LPC also evaluates and considers dozens of potential landmarks and historic districts each year.

## **Factor 3: Nature and Importance of the Program:**

Landmark designation affects communities, including property owners and business owners. It is very important for LPC to be able to communicate effectively with all stakeholders involved when discussing the potential designation of a property or consult with them regarding applications to make changes to a landmarked building. Lack of language services may result in inability to get permits for work or in work that is in non-compliance with the Landmarks Law, resulting in the issuance of more Notices of Violation and unnecessary fines. Language should not be a barrier to protecting the city's cultural and architectural heritage.

## **Factor 4: Resources Available**

LPC will use agency contracted services to provide language services on an as-needed basis. The agency has secured contracts with vendors to translate its documents on an as needed basis, and for in-person and telephonic interpretation needs.

# **VI. Provision of Language Access Services**

## **Translation Services**

- LPC uses agency-contracted services (Accurate Communications, Inc) to translate documents on an as needed-basis. The agency also uses bilingual staff who are native speakers of the language and knowledgeable in the subject matter. For example, LPC will use preservation staff (when



available) to translate and review content related to regulation and permitting, which are their areas of expertise.

- LPC determined that its most commonly distributed documents are its permit application forms and Historic Preservation Grant Program forms. There are four types of permit application forms: the Standard Application Form, the Expedited Certificate of No Effect Application Form, the FasTrack Application, and the Post-Approval Application Form. These forms are available electronically through our website and LPC now accepts these forms electronically by email. LPC has translated instructions for filing these forms electronically into Chinese and Spanish, which are the top two languages spoken within its designated historic districts. The agency plans to translate the instructions into the remaining languages this year and is also going to add information on the website translated into the top 10 languages instructing applicants to contact LPC if they need assistance filling out the form in another language. The agency is also translating the permit application forms into Chinese and Spanish this year. There are two Historic Preservation Grant Program forms: the Homeowner Application Form and the Not-for-Profit Application Form. LPC plans to translate these forms into Chinese and Spanish this year and is going to add information on the website translated into the top 10 languages instructing applicants to contact LPC if they need assistance filling out the form in another language. The agency is committed to translating all six forms into the remaining top 10 languages, pending additional resources.
- Until a point in time when LPC determines the need to translate any additional written materials or forms, translation services will be provided on an as needed basis.
- The Commission's Director of Communications, who serves as the Language Access Coordinator, manages translation needs and requests. The LAC is responsible for coordinating any contracts for translation and interpretation, with the LPC Executive Director, the Director of Finance and Operations and the Director of Administration.
- The LAC is also responsible for training staff so that they are aware of the agency's translation services and on how to request translation services.

## **Interpretation Services**

- **In-Person Interpretation:** LPC uses agency contracted services to provide in-person interpretation on an as-needed basis. The agency has a contract with Accurate Communications, Inc.
- **Telephonic Interpretation:** LPC is equipped to provide telephonic interpretation in at least 100 languages, including the designated citywide languages. The agency has a contract with Language Line Services, Inc. for all telephone-based interpretation services.
- The Commission's Director of Communications, who serves as the Language Access Coordinator (LAC), manages translation needs and requests. Staff can also access interpretation services directly through the vendor. The LAC is responsible for training all staff so that they are aware of the agency's interpretation services and on how to request translation services and distribute language identification cards to staff so that they can identify the primary language of LEP individuals.

- The agency will provide interpretation services for walk-in applicants (in-person or over the phone, whichever is fastest), for applicants who call into the agency (telephonic interpretation), during in-person public hearings/meetings and outreach events(in-person interpretation) and virtual hearings/meetings (telephonic interpretation).
- When telephonic and in-person interpretation services are provided, the agency will request feedback from staff and LEPs on the quality of the service.

## **Language Access in Agency Communications**

- Public Hearings: LPC public hearing and meeting notices include language indicating that any person who requires an interpreter to attend or participate, can contact the agency for assistance. This tagline is translated into the 10 designated citywide languages.
- Outreach: Property owner outreach letters include language indicating that any person who requires translation can contact the agency for assistance. This tagline is translated into the 10 designated citywide languages. During outreach meetings, LPC will provide interpretation services and translate presentation materials for LEPs on an as-needed basis. The agency will also translate flyers for community outreach events considering the population in those communities. The translated flyers are used in social media promotion as well.
- Website: LPC has Google Translate built into the website, which can translate the web content into the 10 designated citywide languages. LPC has information on how to use the Google Translate feature. LPC is aware that these automated translations are only an approximation and is committed to including more multilingual content on its website, including instructions on filing applications and other content related to the services it provides. The agency will also provide on-request translation of documents linked to our website, pending additional resources.

## **Plain Language Access**

LPC will use plain language to the extent that its use does not interfere with any technical language essential to LPC business. The agency reviewed its most commonly distributed documents and determined they were the permit application forms. The agency worked with a vendor to simplify these forms and make them more plain language. The Director of Communications will continue to review all materials incorporate the use of plain language where necessary and in any future documents.

## **Policies and Procedures**

LPC is committed to providing equitable service to the population it serves, including LEP persons. The agency takes reasonable steps to ensure LEP persons have access to the agency's programs and services. This includes providing language access services to those who need it at no cost to them.

The agency has Language Identification Cards to help LEP individuals and staff identify their language by pointing to it. Staff are also trained/receive information on how to provide these services.

### Applicants

If an applicant requires a translation of a document or assistance in their language, staff would notify the LAC or the Public Information Associate to arrange for a translation of the document or an interpreter

over the phone to assist. Staff are also trained and receive information in order to arrange for a telephone interpreter themselves by conferencing them in.

### Public Hearings

Any member of the public requiring language assistance services in order to participate in the hearing or the meeting can contact LPC so that the agency can arrange for an interpreter to be present. This information is included in the agenda in English and the 10 designated citywide languages. The LAC and/or Public Information Officer would reach out to the contracted vendor to make all the necessary arrangements.

### Visits and In-person Meetings

There are language identification posters in prominent locations near the reception desk and the door as well as near the public hearing room that let people know in multiple languages that free interpretation service is available at no cost if they require it. All they need to do is point to their language, so that staff can call an interpreter for them. We also have a language identification guide for telephonic interpretation that includes around 100 languages. If their preferred language is not listed in the language identification posters, staff can contact our telephone interpretation vendor, and they can help identify the language. Staff are trained and receive information on how to connect with our contracted vendors and distributed language identification cards. Staff will take note of what language they point to and call the telephonic interpretation service directly.

### Telephone Calls

As part of their training, staff receive information to help them identify an LEP over the phone. For example, if they find that a caller does not speak English or is having trouble speaking English, they should conference in an interpreter. Staff are provided information for the vendor. If they cannot identify the language, Language Line has the capacity to assist by phone and identify an interpreter who can assist.

### Translation of Documents

The Commission's Director of Communications, who serves as the Language Access Coordinator, manages translation needs and requests. The LAC is responsible for coordinating any contracts for translation and interpretation, with the LPC Executive Director, the Director of Finance and Operations and the Director of Administration.

## **Notification of Free Interpretation Signage**

LPC has multilingual signage posted near the reception desk and in the public hearing room area notifying customers of the availability of translation and interpretation services. LPC also has Language Identification Cards at the front desk to help LEP individuals identify their language by pointing to it. All staff will have Language Identification Cards, as well.

LPC also has notifications for LEP-identified individuals that interpretation and translation services are available to them at no cost on its public hearing agendas, on the website and this information is included in letters to property owners during designation outreach.

## **Languages beyond the Top 10**

The primary languages spoken by LEP individuals within LPC's historic districts are the 10 designated citywide languages. If the need arises to provide interpretation or translation into languages beyond the top 10, the agency will use its contracted vendors to communicate with LEPs who speak additional languages. LPC's contracted vendors offer translation and interpretation services into languages beyond the top 10.

### **Emergency Preparedness and Response**

LPC does not provide emergency services so notifications would be limited to announcing agency hours and postponements. The Director of Communications, who is also the LAC, is part of the Continuity of Operations Plan (COOP) implementation team and will ensure that all communications that need to be made public are translated.

### **Licenses, Permits and Registrations (LPRs)**

- LPC issues permits for work on landmark properties. In order to obtain these permits, applicants need to submit a permit application form. There are four application forms (the form used depends on the type of work): the Standard Application Form, the Expedited Certificate of No Effect Application Form, the FasTrack Application, and the Post-Approval Application Form. These forms are available electronically through our website and LPC currently accepts these forms electronically by email. LPC has translated instructions for filing these forms electronically into Chinese (Simplified and Traditional) and Spanish, which are the top two languages spoken within its 151 designated historic districts. The agency plans to translate the instructions into the remaining languages this year and is also going to add information on the website translated into the top 10 languages instructing applicants to contact LPC if they need assistance filling out the form in another language. The agency also plans to translate the forms into Chinese and Spanish this year and is committed to translating them into the remaining top 10 languages, pending additional resources.

## **VII. Training**

All staff will be informed of LEP policies and procedures.

- All staff will be informed of the availability of LEP services for the public (translation and interpretation) and how they can obtain these services and reminded in writing at least once a year.
- All staff will be trained on how to respond to LEP callers. The depth of training will depend on the staff person's contact with the public.
- All staff members with frequent in-person or telephone contact with the public will be trained on how to assist LEP individuals and how to respond to LEP callers. They will also be trained on how to use in-person and telephone interpretation services.
- All public-facing staff members will receive Language Identification Cards and instructions on how to use them, as well as contact information for all available interpretation services.
- All newly hired staff will receive information on LEP policies and procedures as part of their new hire orientation.

- Training includes how to identify LEPs, how to access translation and interpretation services and tips for communicating with LEPs.
- All staff will receive training at least once a year through in person or virtual training sessions. Attendance will be taken to keep track of who has received the training.

## **VIII. Record Keeping and Evaluation**

LPC will track all requests for interpretation (telephonic and in-person) and will monitor the frequency of staff contact with LEPs through a Language Access log. Staff will be asked to log each encounter with an LEP and note the language and type of service(s) requested and/or provided and inform the LAC. A logbook is kept with the Director of Communications (who is also the LAC) and the Public Information Officer. The LAC can also access vendor requests for interpretation services used by staff to track language and use.

LPC will update its Language Access Implementation Plan at least every three years and post it on the agency website. The LAC will be responsible for overseeing the implementation of the LAIP and revising it accordingly.

## **IX. Resource Analysis and Planning**

LPC will use agency contracted services to provide language services on an as-needed basis. The agency has contracts in place for telephonic and in-person interpretation needs and for translation of documents deemed necessary.

Additionally, LPC will utilize bilingual staff and seek assistance from MOIA and its citywide Volunteer Language Bank to supplement these contracted services. They will be used to review translated documents.

LPC's Other Than Personnel Service (OTPS) budget is \$600,000 and the current baselined amount for language services is \$6,000. This covers the contracts and the agency's commitment to translate its forms into the top two languages and instructions/notifications into the top 10 languages and providing telephonic interpretation. Language access will continue to be integrated into the agency's annual budget to cover the costs of its service contracts.

The agency will continue to explore ways to make its information and processes more accessible to all New Yorkers, pending additional resources.

## **X. Outreach and Public Awareness of Language Access Services**

Reaching out to property owners is an integral part of the landmarks process. When LPC sends correspondence to a property owner notifying them of the agency's interest in their property, the letters include an insert with a translated tagline stating interpretation and translation services are free of charge. Likewise, LPC will work with homeowners requesting language services on an as-needed basis.

LPC holds frequent public hearings/meetings. Notices for public hearings/meetings which include the agenda are published on the City Record and posted on the agency website. They are also sent to community boards, applicants and property owners by email. The notices include a tagline regarding the availability of interpretation services translated into all 10 languages.

LPC also has information on the website and signage at the front desk notifying customers of language access.

## XI. Language Access Complaints

LPC has a dedicated email for filing a complaint regarding the agency’s language access ([access@lpc.nyc.gov](mailto:access@lpc.nyc.gov)). There is information on the website, within the agency’s language access page, on how to file a complaint with the agency. The inbox for the language access complaints email is monitored by the Director of Communications (who is also the LAC) and the Public Information Associate, who reports to the Director of Communications. Language access complaints can also be made through 311. These complaints are sent to the Public Information Associate. The LAC is responsible for responding to these complaints.

The agency will log these complaints and respond in a timely fashion, making any necessary changes to the plan. The External Affairs Officer and Director of Communications will be responsible for receiving, tracking and resolving Language Access complaints. The annual LAIP report will include a summary of complaints received during the year.

## XII. Implementation Plan Logistics

Within the range of services provided, LPC understands that resources and demand will dictate the provision of services in any given area.

The Commission’s Director of Communications, who serves as the Language Access Coordinator, is responsible for coordinating any contracts for translation, interpretation, and signage with the LPC Executive Director, the Director of Finance and Operations and Director of Administration. The Public Information Associate will work with the Director of Communications to fully maintain and update the tracking of the plan needs and complaints.

Language access goal	Milestones	Responsible staff	Deadline
Translate application forms into Spanish and Chinese and make them available to the public	Work with vendor to translate and format forms	Director of Communications	July 31, 2021
Translate instructions for e-filing applications into the remaining top 10 languages	Work with vendor to translate the instructions and post on the website.	Director of Communications	TBD pending launch of e-filing portal
Identify ways to improve the accessibility of LPC's website - beyond using	Work with vendor to translate the content and post on the website.	Director of Communications	December 31, 2022

Google Translate (i.e. adding more multilingual content.			
Translate application forms into the remaining designated citywide languages	Identify additional resources/funding to translate the forms.  Work with vendor to translate the forms and post on the website	Director of Communications  Executive Director  Director of Finance and Operations	TBD pending additional resources

# Mayor's Office

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## Language Access Implementation Plan

February 2020

**Mayor Bill de Blasio**



**Mayor's Office  
Language Access Implementation Plan**

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**Mayor's Office**  
**Language Access Implementation Plan**

**Language Access Coordinator:** Kenneth Lo, Deputy Director of Language Access, MOIA

Under the de Blasio Administration, the City of New York strives to be the safest and fairest big city. Communication plays a central role in the effective delivery of government services and community engagement. Local Law 30 and language access are critical to ensuring that all New Yorkers, regardless of the language(s) they speak, have access to the information and services provided by their City.

The Office of the Mayor of New York City, or Mayor's Office, is comprised of a number of distinct offices that address a wide array of public needs. The Mayor's Office Language Access Implementation Plan addresses how Mayoral offices that are covered under Local Law 30 (based on their engagement with the public), address language access.

The Plan was developed by the Mayor's Office of Immigrant Affairs (MOIA), in coordination with all other covered Mayoral offices. MOIA advances language access throughout City government through capacity-building, technical assistance, and guidance to City agencies on language access and the provision of services that support the wellbeing of immigrants. MOIA provides a central coordination role for the City's language access laws, specifically oversight of LL30, in consultation with the Mayor's Office of Operations (Operations).

Each covered office has appointed a Language Access Liaison who will be responsible for overseeing the implementation of the plan for their respective Office, and MOIA will provide oversight and technical assistance to help offices meet the requirements of Local Law 30.

## **I. Agency mission and background**

The Office of the Mayor of New York City, or Mayor's Office, is comprised of a number of offices that address a wide array of public needs. The Mayor's Office Language Access Implementation Plan addresses how Mayoral offices that are covered under Local Law 30 (based on their engagement with the public), address language access. A description of each covered office is below.

### *Mayor's Office for People with Disabilities (MOPD)*

The Mayor's Office for People with Disabilities (MOPD) is the liaison between New York City government and the disability community. In partnership with all City offices and agencies, MOPD ensures that the rights and concerns of the disability community are included in all City initiatives and that City programs and policies address the needs of people with disabilities.

### *NYC Service*

NYC Service builds partnerships to deepen and expand civic engagement through volunteer and service programs, creating sustainable change for our city's greatest needs.

### *Citywide Event Coordination and Management (CECM)*

CECM provides oversight on all event permitting activities; advises and assists the Mayor in the coordination of policies, procedures and operations in relation to permitting; reviews the coordination of street activities and pedestrian plaza events; and works directly with other permitting agencies to ensure active communication with residents, community boards and business improvement districts.

### *Office of Climate Policy and Programs (CPP)*

The Mayor's Office of Climate Policy and Programs leads New York City's fight against climate change and manages OneNYC 2050, New York City's Green New Deal and a long-term strategy to secure our city's future against the challenges of today and tomorrow, with bold actions to confront our climate crisis, achieve equity, and strengthen our democracy.

### *Environmental Coordination (MOEC)*

The Office assists City agencies in carrying out their environmental review responsibilities. In addition to being the repository for all City Environmental Quality Review (CEQR) documents, the Mayor's Office of Environmental Coordination serves as the City's liaison to state and federal agencies on environmental matters and advises the Mayor on matters of environmental policy.

### *Mayor's Office of Resiliency (MOR)*

The Mayor's Office of Resiliency strives to adapt New York City to the unprecedented challenge of climate change, creating a more resilient, equitable and vibrant city for the New Yorkers of today and generations to come. MOR leads the City's efforts to ensure that New York City is ready to withstand and emerge stronger from the multiple impacts of climate change in the near- and long-term.

### *Office of Sustainability*

The Mayor's Office of Sustainability is dedicated to making New York City greener and fairer,

and reaching zero waste and carbon, through policies, programs, and direct outreach and engagement.

*Community Affairs Unit (CAU)*

The Mayor's Community Affairs Unit is the fundamental connection between City Hall and New York City residents throughout the five boroughs. The primary mission of CAU is to establish deep partnerships with communities in order to actively engage and mobilize New Yorkers in City government.

*Mayor's Office of Correspondence*

The Mayor's Office of Correspondence is responsible for reading, routing, and responding to all letters, emails, and 311 calls addressed to the Mayor. Correspondence staff also draft mayoral messages, certificates and proclamations for events, in addition to assisting other mayoral offices and agencies with a variety of writing and editing projects.

*Mayor's Office of Criminal Justice (MOCJ)*

The Mayor's Office of Criminal Justice shapes and funds justice strategies at every stage by facilitating cooperation and partnerships among the agencies and actors involved in crime prevention and criminal justice in New York City. As such, MOCJ serves to ensure the fair and efficient functioning of the Criminal Justice System in the City.

*Mayor's Office to Protect Tenants (MOPT)*

The Mayor's Office to Protect Tenants (MOPT) coordinates the City's range of tenant protection efforts and plays a key role in the City's strategy to confront the affordable housing crisis. This newly established office will work across City agencies to make existing anti-harassment and anti-displacement programs better, and create new strategies to root out abuse.

*Office of Environmental Remediation (OER)*

The New York City Mayor's Office of Environmental Remediation is a team of scientists and engineers that design and operate municipal programs to promote cleanup and redevelopment of vacant contaminated land in New York City.

*Office of Immigrant Affairs (MOIA)*

The mission of the New York City Mayor's Office of Immigrant Affairs is to facilitate the full inclusion of immigrant New Yorkers into the City's civic, economic, and cultural life. Realizing this mission in a city as diverse as New York City requires multiple approaches to advance immigrant inclusion. MOIA seeks to increase access to services for immigrant New Yorkers, as well as inform and engage and advocate on behalf of immigrant New Yorkers.

*Office of Special Enforcement (OSE)*

The Mayor's Office of Special Enforcement (OSE) is an innovative, solutions-oriented task force that ensures NYC communities are safe from harmful illegal and unregulated industries that one agency and one set of enforcement tools alone can't address.

*Office of Special Projects and Community Events (MOSPCE)*

In support of the Mayor and First Lady's commitment to honor the diverse communities of our City, the Mayor's Office of Special Projects and Community Events organizes Mayoral events in partnership with city agencies and with the support of the private sector.

### Office of Workforce Development

The Mayor's Office of Workforce Development drives an equity agenda for the future of work in New York City by ensuring the City invests in all New Yorkers, by driving high road jobs and employers, and by connecting elements of the system to achieve better outcomes for New Yorkers and employers.

### Public Design Commission (PDC)

As New York City's design review agency, the Public Design Commission (PDC) has jurisdiction over permanent structures, landscape architecture, and art proposed on or over City-owned property. The mission of the PDC is to advocate for innovative, sustainable, and equitable design of public spaces and civic structures, with a goal of improving the public realm for all New Yorkers throughout the five boroughs.

### Thrive NYC

ThriveNYC works to ensure that every New Yorker has access to mental health support, whenever and wherever they need it. ThriveNYC works in partnership with many City agencies to: Innovate by piloting new evidence-driven strategies to address mental health needs; enhance mental healthcare equity by increasing access to mental health support outside of traditional clinical settings, in locations such as shelters, senior centers, schools and community-based organizations; and promote inclusion by reducing stigma and cultural barriers to care and partner with communities to ensure that vulnerable populations know about and have access to mental health support.

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

It is the policy of the Mayor's Office to provide timely, meaningful access for persons with Limited English Proficiency (LEP) to services and information, in accordance with Local Law 30 of 2017.

- All personnel shall provide free language assistance services to individuals with LEP whom they encounter or whenever a person with LEP requests language assistance services.
- All personnel will inform members of the public that language assistance services are available free of charge to persons with LEP and that the agency will provide these services to them.
- Language assistance available to the public under the provisions of Local Law 30 includes: telephonic interpretation, in-person interpretation where appropriate, and translations into ten designated Citywide languages of documents deemed to be most commonly distributed by the covered offices.

## **III. LEP population assessment**

As guided by Local Law 30, the Mayor's Office applies the "four factor analysis" promulgated by the US Department of Justice to assess obligations for language access as the basis for its Language Access Implementation Plan.

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

As noted in Section I, the units of the Mayor's Office have multiple and varied types of engagement with the public across New York City. The eligible service population, accordingly, is the general population of New York City.

The Mayor's Office, led by MOIA, looked at citywide data to assess the number or proportion of LEP persons and their languages in the eligible service population for the services and information provided by covered offices. According to analysis of Census data provided by the Department of City Planning, 49% of New Yorkers above the age of five, or approximately 3.9 million New Yorkers, speak a language other than English at home. Twenty three percent of New Yorkers, or 2 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 Mayor's Office applies the analysis undertaken by MOIA under Local Law 30 to determine the top ten citywide languages based on data from the Census and the NYC Department of Education. Based on this analysis, the ten citywide languages for FY18 - FY21 are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish.

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

According to the breadth and variety of activities realized by the Mayor's Office, the frequency with which units of the Office come into contact with individuals with LEP varies.

Some units, such as MOPD, MOIA, and CAU, engage directly with individuals with LEP on a regular basis, while other units have much lower frequency of contact. Many offices have

significant contact with populations with LEP, but only a few times a year, in relationship to specific initiatives, campaigns, or events. Others have activities that are open to the general public, and therefore must also be accessible for individuals with LEP.

### **Factor 3 – the importance of benefit, service, information or encounter to the LEP person**

The Mayor's Office serves as a critical link between the City's government and its constituency.

Units across the Mayor's Office provide invaluable information and services to the public in a variety of ways, including, but not limited to:

- constituent services and outreach (MOPD, MOIA, MOSPCE, WKDEV)
- provision of permits (CECM)
- events, town halls, and public meetings (MOIA, CAU, MOCJ, OEC, OER)
- community engagement around sustainable futures for our City (Sustainability, MOR, CPP)

In recognition of the importance of these services to the civic participation of all the communities of our City, the Mayor's Office, through this Language Access Implementation Plan, lays out how it will ensure New Yorkers with Limited English Proficiency have meaningful access to its information and services.

### **Factor 4 – resources available**

MOIA's Language Service Team (LST) provides language services for covered Mayoral offices and contracts with translation, in-person and telephonic interpretation vendors through the DCAS language service contracts and contracts with a third party translation vendor that provides a quality assurance review on translated documents.

MOIA has procured interpretation equipment as well as computer-assisted translation tools, to streamline translation requests, improve consistency, quality, and turnaround times of translated materials.

MOIA has expanded its Language Service Team and budget in anticipation of support for the covered units of the Mayor's Office. The LST will continue to calibrate its budget requests as it continues to provide language services under LL30.

Mayoral offices also employ bilingual staff, who can engage directly with LEP individuals.

### **Evaluation of language access needs of agency's service population**

Based on our assessment of the above factors, a significant number of the Mayor's Office's target service population has LEP.

While speakers of the ten Designated Citywide Languages under Local Law 30 account for more than 85% of foreign-born New York City residents with LEP, MOIA makes additional efforts to engage speakers of languages beyond the ten designated under the law.

In order to ensure that MOIA's Outreach Team can effectively engage with these hard-to-reach communities that it has identified, MOIA provides interpretation in and translates materials

into languages beyond the local law languages. Additionally, MOIA's LST collaborates with other Mayoral Offices to support specific requests. For example, in calendar year 2018, the LST:

- provided over 330 interpreters that spoke 18 languages at 110 Mayor's Office events.
- translated materials into 38 languages in response to directed outreach to specific communities. These languages include Nepali, Tibetan, Greek, Burmese, Tajik, Uzbek, Punjabi, Wolof, Quechua, Kiche, Greek, and Japanese.

As part of the implementation plan, MOIA will continue to work with Mayoral Office units to assess their respective engagement with New Yorkers with Limited English Proficiency.

#### **IV. Provision of language assistance services**

The Mayor's Office provides language services to serve, communicate, and engage with its constituents through multiple means. Across the array of resources, the Mayor's Office seeks to improve the coverage, appropriateness, effectiveness, and efficiency of its language services.

##### **Bilingual Staff**

The Mayor's Office recognizes that understanding cultural nuances of immigrant communities and being able to communicate with New Yorkers who are limited English proficient without the use of an interpreter are critical. Roughly half of New Yorkers speak a language other than English at home. The language ability of bilingual staff is an important asset, if used appropriately, for communicating with fellow New Yorkers.

As such, several units of the Mayor's Office employ bilingual staff. MOIA in particular seeks to hire bilingual staff for any position that will directly engage with LEP individuals. Its Outreach Team, for example, collectively speaks roughly six to eight languages and MOIA's Constituent Services Team has bilingual staff and fellows. Additionally, agencies such as CECM, CPP, OEP, OEC, CAU, and Special Enforcement Offices currently employ bilingual staff members who, where appropriate, communicate directly with individuals with LEP.



## **Professional Language Services**

While multilingual staff are an asset to reaching New Yorkers with LEP, the Mayor's Office does not rely on them to translate materials or interpret. To ensure effective communication, the Mayor's Office uses the services of contracted translation and interpretation vendors. Bilingual staff may be used to communicate directly with New Yorkers with LEP in their primary language, as opposed to acting as an interpreter for another staff member who is rendering services to a client.

In December 2016, MOIA established the Language Services Team (LST) to centralize the coordination of language services within MOIA and select Mayoral Offices. MOIA's LST provides services for Mayoral Offices that need these services by:

- Overseeing the delivery of translation and interpretation services
- Providing a point of contact for staff, external vendors and other partners
- Managing procurement and accounting of contracted language services
- Distributing and maintaining an inventory of interpretation equipment
- Providing training to Mayor's Office staff
- Identifying new needs and language services solutions

This centralization streamlines the processing of requests and turnaround times, and leverages the language access technical expertise of staff, which improves the quality of the multilingual content that the Mayor's Office delivers. The LST stays up to date with developments and trends in the language services industry. In spring 2018, the LST launched an online portal for translation and interpretation requests from MOIA and Mayoral Offices to structure communications and project management.

Below, we describe our approach to providing translated documents and interpretation services.

### ***Translation***

The Mayor's Office aims to ensure that critical written material is available and disseminated in the languages needed by its target audiences. The LST works with a translation vendor through the DCAS Citywide Language Services contracts to translate these materials.

### **"Most-commonly-distributed" documents**

During FY20, units of the Mayor's Office will identify their most commonly distributed documents. Liaisons will submit them to the LST for translation into the top 10 LL30 languages.

### Plain language

The LST language access training addresses how to develop content and design materials for a multilingual audience. During FY20, units of the Mayor's Office will review their most commonly distributed documents and which will be translated into the ten languages designated under LL30. Units will integrate plain language review into the workflow for all new document creation, to ensure that ease of translation and accessibility in English. MOIA and Operations will provide technical assistance around plain language practices.

### Quality Assurance/Quality Improvement

The LST incorporates standard practices and tools from the language service industry to expand delivery of translated materials that are high quality and produced in a timely fashion.

To ensure quality, the LST's practices incorporate:

- Standardized project and file management for translation projects, including version control.
- Consistent and proactive communications with vendors and clients (colleagues at MOIA and other Mayoral Offices).
- Advising clients, including sister agencies, on content issues that may affect the translation process.
- Conducting training for staff of covered Mayoral Offices.
- Liaising with vendors and DCAS to ensure we receive high quality services.
- Standardizing the tools used to produce materials (e.g., Adobe Creative Cloud).
- Expanding the use of a glossary (or termbase) and style sheets.

In 2018, the LST introduced computer-assisted translation (CAT) tools from the language services industry to manage an increasing body of multilingual content. These tools help improve the quality and consistency of translated materials as well as turnaround times.

While the contracted vendor has a quality assurance process, MOIA provides supplemental quality assurance through a contract with a secondary translation vendor that reviews certain translated materials. MOIA's bilingual staff or the Citywide Volunteer Language Bank may also provide quality assurance reviews of materials.

The LST developed a language service protocol and distributes a one-page guide for staff on how to request translation and interpretation services and how to use telephonic interpretation. The LST reviews its provision of language services to identify opportunities for improvement through refined practice (coordination and collaboration) and more appropriate inputs (vendors, tools/technology).

### Written communications beyond the "most commonly distributed" documents

The Mayor's Office will assess what additional communications covered units have with LEP individuals and how to make those accessible, so as to continue to expand coverage over time.

### ***Interpretation***

When it is not appropriate to use bilingual staff, the Mayor's Office will use professional interpretation services (either in-person or over the phone) in its outreach, to respond to constituent inquiries, and at points of service, as needed. MOIA procured these interpretation vendors through the DCAS Citywide Language Service contracts. The LST assesses feedback about the quality of services and relays any concerns back to the vendors, and/or engages with DCAS, as necessary.

#### **In-Person Interpretation**

MOIA provides interpretation at events and gatherings, including Mayoral Town Halls and other public-facing events held by Mayoral Offices. For these events, MOIA uses its contracted vendors to provide consecutive or simultaneous interpretation in languages of the target audience. MOIA has purchased and maintains interpretation equipment, including both stationary and portable transmitters, receivers, headphones, and booths, to allow for simultaneous interpretation. The LST provides this equipment and coordinates interpreters for events organized by MOIA staff and covered Mayoral Offices.

#### **Telephonic Interpretation**

Telephonic interpretation provides a valuable and flexible service to support exchanges in languages not spoken by bilingual staff – for phone calls and to support in-person encounters in the office or in the field. Telephonic interpretation provides ready access in more than 200 languages. All Mayoral Office staff can access telephonic interpretation service through the DCAS contract with Language Line, coordinated by MOIA.

### ***Notification of Free Interpretation Services***

The Mayor's Office informs members of the public about the availability of free interpretation services in multiple ways, including through multilingual signage and outreach presentations. MOIA developed wall posters, tabletop signs, and wallet-sized "I Speak" cards to support awareness about the availability of free interpretation. City agencies and Mayor's Offices can access these tools through the Immigrant Resources Portal on Cityshare, the citywide intranet. MOIA has promoted these tools to covered units in the Mayor's Office.

MOIA also provides signage and makes announcements at events where there is interpretation to ensure individuals with LEP are aware of the service. MOIA's multilingual "Know Your Rights" presentations also promote awareness about Local Law 30 and New Yorkers' rights to language services across City government (see Section VIII).

### ***Emergency Planning***

In partnership with NYC Emergency Management (NYCEM) and the Department of Social Services (DSS), MOIA coordinates language access in certain emergencies. When the emergency is of a certain scale, NYCEM triggers the "Language Access Lead Team," comprised of NYCEM, DSS, MOIA and other key agencies to assess language access needs, determine provision of

language services, and identify whether additional resources need are needed. Covered units are responsible for ensuring materials they use in emergencies are translated.

## **V. Training**

To ensure that Mayor's Office staff are aware about language access obligations and services available to support their efforts, the LST provides annual training for MOIA staff and MO Language Access Liaisons. The training addresses the following:

- The importance of language access in ensuring equity and its importance to the mission of the Mayor's Office;
- The City's legal obligations around language access, including Local Law 30;
- The language services resources available to MO staff to ensure they can communicate with LEP New Yorkers and how to access those services; and
- Steps staff can take to ensure the quality of multilingual communications, including standards for ensuring that documents are written in plain language.

The LST also provides additional refresher trainings on language services and the use of interpretation equipment for Language Access Liaisons and/or staff developing materials or conducting outreach.

The LST distributes its one-page guide on how to request translation and interpretation services and how to use telephonic interpretation to staff. The LST reviews and updates training and instructional materials at least annually to further integrate multilingual communications across operations.

Language Access Liaisons are responsible to for distributing the guide to language services to all new staff and providing periodic reminders to staff about what is available to them and their respective Office's responsibility to provide services.

## **VI. Record keeping and evaluation**

The LST processes and tracks the translation of materials, as well as requests and fulfillment of interpretation services at covered Mayoral Offices. The LST regularly assesses the volume of service requests and how they were provided.

In alignment with the procurement and fiscal cycles, the LST reviews its delivery of language services with members of MOIA's Senior Team to identify new needs and opportunities for improvement. This review includes an assessment of demand for language services, the LST's ability to meet demand and manage projects effectively, and any issues encountered with respect to contracted services.

## **VII. Resource analysis and planning**

In addition to periodic review by the LST to improve its delivery of language services and identify gaps in provision (see Section IV), MOIA seeks to better understand shifts in language needs across immigrant communities and to ensure that communications and communications resources are being used effectively.

MOIA relies on outreach by MOIA staff to immigrant communities (see Section VIII below), conducts demographic research, and monitors data releases from the Population Division of the Department of City Planning and other sources of demographic information. MOIA's broader research and evaluation will be used to guide its provision of services and technical assistance to Mayoral Offices.

MOIA maintains relationships with immigrant-serving community organizations that share the priority needs and challenges faced by their respective communities, including language barriers to accessing services. This information guides MOIA's practices around staffing, developing multilingual information and resources for these communities, and working with contracted vendors. MOIA also supports immigrant communities by sharing relevant information with and from City agencies and Mayoral Offices. MOIA looks to expand and deepen its collaboration with organizations serving newer or underserved communities and organizes multilingual community forums to engage residents.

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

There are various ways Mayoral Offices can promote awareness of languages services. As noted in Section IV, MOIA has provided tools, such as signage, "I speak" cards, and "Point to Your Language" one pagers that inform New Yorkers about interpretation services. Offices will also provide notification on their websites regarding the availability of free interpretation and translated materials, add notification on relevant flyers and include this information in outreach presentations, as appropriate. Sections IV and VII describe additional ways MOIA raises awareness to communities about language services, including through its Know Your Rights presentations and engagement with immigrant-serving community organizations.

## **IX. Language Access complaints**

All covered Offices will appoint a liaison who will receive, troubleshoot, and track language access complaints received via 311. Liaisons will provide a response to the complainant within 14 days as per the Citywide Customer Service Standard. Liaisons will contact appropriate staff member to investigate the complaint, respond to the constituent, and if necessary, re-issue any relevant guidance regarding language access. MOIA is copied on complaints, which it tracks to ensure offices have followed up.

## X. Implementation plan logistics

Implementation Goals & Timeline		
Providing Language Services	- MOIA provides training to liaisons of covered mayoral offices regarding LL30, language services available to them and how to request services	CY19 Q3
	- MOIA distributes telephonic interpretation codes to offices	CY19 Q3
	- Offices identify commonly distributed docs	CY20 Q1
	- Offices will integrate plain language principles into material creation	CY20 Q1
	- Begin translation	CY20 Q1-CY20 Q2
Training	- MOIA trains mayoral office liaisons	CY19 Q3
	- Liaisons disseminate info to staff	CY 19 Q3- CY 20 Q1
Awareness of free language services	- MOIA provides tools (signs, "I speak" cards, etc.)	CY19 Q3
	- Offices post signage (if applicable)	CY20 Q1
	- Offices disseminate other tools to staff	CY20 Q1
	- Offices add text to outreach/hearing flyers and presentations re availability of free interpretation	CY20 Q1-CY20 Q3
	- Offices provide multilingual note on respective websites about free language services	CY20 Q1
311 Complaint Procedures	- Offices designate a person to receive 311 complaints	CY20 Q1
	- Offices determine process for responding to 311 language access complaints	CY20 Q1



# Language Access Implementation Plan

City of New York  
Mayor's Office of Media and Entertainment

Updated May 2021

## I. Agency Name and Agency Language Access Coordinator

- A. **Agency Name:** City of New York Mayor's Office of Media and Entertainment ("MOME")
- B. **Name and Title of MOME Language Access Coordinator:**  
Lori Barrett-Peterson, General Counsel, Mayor's Office of Media and Entertainment
- C. **Link:** <https://www1.nyc.gov/site/mome/about/language-access.page>



## II. Agency Mission and Background

- A. Mission of the Agency:** The Mayor's Office of Media and Entertainment (MOME) works to support New York City's thriving creative economy and make it accessible to all.
- B. Services and Interaction with the Public:** Media and entertainment industries in MOME's portfolio include: film, television, theater, music, publishing, advertising, and digital content. MOME's portfolio also includes the nightlife industry. MOME comprises four divisions:
- **The Office of Film, Theatre and Broadcasting**, which coordinates film and television production throughout the five boroughs.
    - o This division interacts with the public by issuing film permits for the use of public property for film and television production.
  - **NYC Media**, the largest municipal television and radio broadcasting entity in the country with a reach of 18 million viewers within a 50-mile radius.
    - o This division interacts with the public through its television and radio network.
  - **Programs and Initiatives** in film, television, theater, music, publishing, advertising and digital content to support the development of NYC's creative industries, which account for over 305,000 jobs, and an economic output of \$104 billion.
    - o This division interacts with the public through sponsorship of media and entertainment programs (e.g., film festivals, media conferences, performances) and workforce development programs in theater and film/TV.

- **The Office of Nightlife**, supporting the sustainable development of New York City's nightlife industry which accounts for close to 300,000 jobs and an economic output of \$35.1 billion.
  - o This division primarily interacts with the public through the provision of guidance to nightlife establishments.

## III. Agency Language Access Policy and Goals

### A. Policy and Goals

Through this Language Access Implementation Plan, MOME outlines its commitment to language access and its approach to ensuring that MOME is effectively engaging with the City's limited English speakers.

MOME's approach to language access is that limited English speakers should be able to access MOME's information and services and communicate with MOME staff. It is the responsibility of MOME to proactively inform and provide language assistance services to ensure access. MOME continues to identify and address language barriers for individuals with LEP. MOME ensures accessibility to services and information to individuals with LEP by:

- Utilizing bilingual staff for some roles that involve direct engagement with the public.
- Providing phone interpretation services, through a Citywide contractor, that supports exchanges in languages not spoken by bilingual staff. Telephonic interpretation through a City contractor provides ready access in more than 170 languages. All MOME staff can access MOME's telephonic interpretation service.

- Providing translations of materials most commonly distributed to the public that contain or elicit important and necessary information regarding the provision of basic City services.
- Training for staff to ensure their commitment to providing language access by explaining the legal obligations and the resources available to them to communicate with limited English speakers and how to access those resources.
- Providing a means for filing complaints about language access at MOME and responding to those complaints.
- Airing foreign language programs on its radio station (WNYE 91.5 FM) and a cable television station (NYC world).

## IV. Agency Language Access Accomplishments and Progress on Goals from Previous LAIP

### A. Accomplishments since 2017:

- MOME procured a contract with Language Line to provide telephonic interpretation and document translations.
- The Office of Nightlife has translated several COVID-19 related documents into the 10 official citywide languages and MOME has translated the most commonly distributed documents that are not legal in nature.

- MOME provided training to staff in the Film Office, the Office of Nightlife, and public facing reception staff on how to request telephonic interpretation services.
- MOME has provided “I Speak Cards” to reception staff.
- MOME has created a directory of staff who are fluent in multiple languages.
- MOME tracks requests for telephonic interpretation.
- MOME creates documents in plain language and communications staff are aware of the plain-language requirement.

**B. Goals from last LAIP and Updates:**

Goal	Update
Established a dedicated email address ( <a href="mailto:Languageaccess@media.nyc.gov">Languageaccess@media.nyc.gov</a> )	Complete
Staff in the Film Office, Office of Nightlife, and public facing reception staff know how to use Language Line for interpretation needs	Complete
MOME submitted its first Language Access Implementation Plan (LAIP) to MOIA	Complete
MOME’s public-facing reception staff has “I Speak” cards in 10 languages	Complete
MOME trained staff who create communications documents about plain language requirements	Complete
MOME posted LAIP publicly	Complete
MOME identified its most commonly distributed documents and translated them where possible (some of our most common documents are legal contracts and we did not translate those)	Complete

MOME procured a contract with Language Line for \$5,000 for FY2021	Complete
MOME included a link on its film permit webpage directing LEP film permit applications to call the office for telephonic interpretation and assistance completing the application	Complete

## V. LEP Population Assessment

MOME applies the “four factor analysis” promulgated by the U.S. Department of Justice to assess obligations for language access as the basis for its Language Access Implementation Plan.

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

MOME looked at citywide data to assess the number or proportion of LEP persons and their languages in the eligible service population for our programs, services, and information.

According to an analysis of Census data provided by the Department of City Planning, 49% of New Yorkers above the age of five, or approximately 3.88 million New Yorkers, speak a language other than English at home. Twenty three percent of New Yorkers, or 2 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 Office of the Language Services Coordinator has determined that the ten citywide languages are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish.

### **Factor 2 – The frequency with which LEP individuals come into contact with MOME:**

The frequency with which LEP individuals come into contact with MOME varies according to the division, as follows:

- **The Office of Film, Theatre and Broadcasting** has minimal contact with LEP individuals, as follows:
  - The Office receives over ten thousand film permit applications per year, and fewer than 10 applicants for film permits self-identified as LEP individuals. This is probably because most permit applicants are television networks, movie studios, and professional film and television production companies rather than individuals.
  - The Office also responds to daily communications from residents and businesses concerning film production on public spaces in their neighborhoods. Although the Office receives few such communications from LEP individuals, potentially, any New York City resident could call the Office about film production in their neighborhoods. Film Office staff is regularly reminded about the availability of telephonic interpretation services via Language Line.
  
- **NYC Media** operates three broadcast television stations, one broadcast FM radio station, and five cable channels.
  - One of the broadcast television channels and one of the cable channels simulcasts government meetings and press events.
  - One of the broadcast television channels and one of the cable channels provides lifestyle programming.
  - One of the broadcast channels and three of the cable channels exclusively provide third-party content from CUNY, Sinovision (Chinese language programs), and Caribbean Information Network.
  - One channel is live traffic feeds, which is silent.

The potential audience for NYC Media programs is anyone who has access to a television or radio in New York City, so the proportion of LEP individuals to the overall number of people served probably reflects overall Census data for New York City. NYC Media does not track all of its television viewership or radio listenership, so we do not know the frequency that LEP individuals watch or listen to our programs.

- **Workforce and Educational Initiatives** has a low-to-moderate level of contact with LEP individuals. Many of MOME's workforce initiatives prepare students and jobseekers for careers in the

media and entertainment industries in New York, where English is the predominant language spoken. Some of MOME's educational programs, such as film festivals that are sponsored by MOME, provide foreign language programming.

- **The Office of Nightlife** has a low-to-moderate level of contact with LEP individuals who may be nightlife business owners, members of the public who visit nightlife establishments, and residents where nightlife businesses are operated. The Office of Nightlife also provides information that is important for business owners, such as how to operate in compliance with law.

**Factor 3 – The importance of benefit, service, information or encounter to the LEP person:** Being able to receive information and report problems with filming activity and nightlife establishments is important to an LEP person. Access to NYC Media and educational programs in foreign language is not as important; however, NYC Media's NYC gov station airs government proceedings (such as City Council hearings) and access to this information is important to an LEP person.

**Factor 4 – Resources available:** MOME has contracts with Language Line for foreign-language interpretation and translation, and Lydia Callis for American sign language. Some of MOME's staff are bi-lingual or multi-lingual and can assist with interpretation and translation. And MOME's televised programs are closed-captioned for the hearing impaired to the extent required by law.

The cost to translate MOME's radio and television programs to foreign languages would be very high, and translation would exceed MOME's financial resources. Nonetheless, MOME airs some foreign-language programming that would appeal to LEP individuals.

# VI. Provision of Language Access Services

## A. Translation

- Resources available to provide translation
  - Vendor: Language Line
  - Bilingual Staff: The agency uses bilingual staff to translate very short phrases (e.g., we used a native French speaking staff member to translate signs for “entrance” and “exit”). We do not use bilingual staff to translate documents that are longer than 100 words.
- Lori Barrett-Peterson, the Language Access Coordinator, project manages translation requests. Staff contact her for translations and she submits them to Language Line through the web portal.
- MOME is taking the following steps to translate the most commonly distributed documents to the public:
  - MOME’s most commonly distributed documents are the film permit application and the red carpet premiere application. MOME has no plans to translate its permit applications because the people who request these applications tend to be corporations or other media and entertainment organizations that have English-speaking staff. There is no demand for translation. Over the past several years, fewer than 10 film permit applicants identified themselves as LEP individuals.
    - MOME’s primary contact with the general public is through the audiovisual programs it airs on its television and radio stations.
  - For the advertisement of public programs available to a particular geographic community, MOME will consider advertising the program in the predominant languages spoken in that community and in community and ethnic newspapers.



- MOME follows plain-language principles for documents most commonly distributed to the public that contain or elicit important and necessary information regarding the provision of MOME's services and for other public communications and MOME uses layout and design strategies to make such documents and communications easier to read, understand, and act upon.
- MOME has Google Translate built into its website, which can translate MOME's web-content into numerous language. There are currently no plans for full-scale website translation.
- MOME distributes translated material digitally and through ethnic and community media
- MOME relies on Language Line for quality control of translated materials.
- MOME's language access coordinator is on MOME's executive staff and regularly reminds leadership to remind staff who create public-facing materials about the duty to consider language access, plain language requirements, the appropriateness of translations, and how to request a translation.

## **B. Interpretation**

- Resources available to provide interpretation
  - Vendor: Language Line (able to interpret in over 100 languages) and Lydia Callis (for American Sign Language)
  - Bilingual Staff: The agency rarely uses bilingual staff to interpret due to the availability of Language Line.
- Lori Barrett-Peterson project manages interpretation requests. This involves providing staff with the contact number for Language Line and liaising with the vendor about billing.
- MOME provides interpretation over-the-phone primarily (we have no walk-in sites; we do not engage in home visits; the subjects of inspections are media and entertainment film and red-carpet premier permittees with

English-speaking staff; and we have not had public hearings in the past two years)

- MOME almost always uses Language Line for telephonic interpretation.
- Reception staff have available I-Speak cards to identify LEP individuals
- MOME depends on its vendor Language Line to quality control interpretation services. (In 2020, we had no requests for telephonic interpretation. In 2019, we had a few.)
- The Language Access Coordinator trained Film Office Staff, Office of Nightlife Staff, and public facing reception staff in how to use Language Line and reinforced that training through the provision of written materials twice per year.

**C. Language Access in Agency Communications**

- MOME provides foreign language programming on its radio and television network
- MOME is committed to providing some foreign-language programming on its radio and television network. It is impossible to translate broadcasts into the 10 citywide languages.
- MOME ensures inclusive community engagement by providing foreign language programming on its radio and television network (e.g., Sinovision provides Chinese-language programming on one of the City's cable channels)

**D. Plain Language**

- MOME's Associate Commissioner for Strategic Communications reviews public-facing materials to make sure that they are written in plain language.
- MOME has a review protocol that requires the Associate Commissioner's review of public-facing materials.

**E. Policies and Procedures**

- MOME distributed written materials to Film Office staff, Office of Nightlife Staff and reception staff that explains how to use Language Line. MOME also provided I Speak

cards to reception staff and the Language Access coordinator explained how and when to use the cards.

#### **F. Notification of Free Interpretation Signage**

- MOME has no walk-in offices, so we do not post physical signs.
- MOME has a notice on its website for help seeking interpretation for a film permit application:  
<https://www1.nyc.gov/assets/mome/pdf/mome-permit-instructions-2020-02-19.pdf>
- On its COVID-19 resources webpage, MOME has links to NYC DOHMH posters that are translated into the 10 citywide languages

#### **G. Languages Beyond the Top 10**

- MOME ensures that individuals who speak languages beyond the top 10 are able to access services and communicate with the agency through the procurement of Language Line for interpretation services. Language Line provides interpretation in over 100 languages.

#### **H. Emergency Preparedness and Response**

- MOME's emergency announcements are generally provided via Mayor de Blasio's press conferences and announcements on our broadcast network. It is impossible to broadcast in all 10 languages.
- MOME will post notifications to the website that can be translated via the translate feature on the site in the event of an emergency.
- MOME's Language Access Coordinator is a member of the Agency's Senior Executive Staff and is MOME's designated representative on NYCEM Continuity of Operations COVID-19 calls.
- MOME plays a lead role in broadcasting emergency announcements as part of the federal government's WARN Act. WARN Act announcements (e.g., severe weather emergency, missing child announcements) originate at the

Federal Emergency Management Agency and other federal, state, and local sources and we must broadcast the announcements as provided. There is no time to independently translate those announcements.

- MOME has a contract with Language Line for interpretation and translation. We are generally able to obtain translations in three business days.
- Multilingual Outreach: Our broadcast network is MOME's primary means of engaging in outreach during an emergency. We have made it possible to include American Sign Language translation during the Mayor's press conferences.
- Bilingual Staff: MOME does not use bilingual staff for emergency translation or interpretation.
- COVID-19 Recovery: MOME provides links to materials that translated: For instance, we link to the translated posters provided by the NYC Department of Health and Mental Hygiene.

## **I. Licenses and Permits**

- MOME issues over 10,000 permits for filming and red-carpet premieres that involve the use of City public property.
- In consultation with MOIA, MOME has determined not to make film permit materials available in the 10 Citywide languages because the users are almost always media and entertainment companies that have English speaking staff.
- On our website, we have [a link that explains](#) how to request interpretation services for filling out the film permit application:  
<https://www1.nyc.gov/assets/mome/pdf/mome-permit-instructions-2020-02-19.pdf>.

MOME is taking the following steps to provide interpretation services:

- For LEP individuals who call MOME with comments about filming activity or nightlife establishments in their

neighborhood, MOME employees will either utilize an available bilingual employee or use Language Line.

- For large public events, such as a “Town Hall,” where access to information and an opportunity to voice concerns is important, MOME will assess the community where the event occurs and provide American Sign Language and/or foreign language interpreters and translate notices about these events.
- MOME will comply with closed captioning requirements in its televised programs in accordance with Title 47, Part 79 of the Code of Federal Regulations.
- MOME does not have walk-in locations for the public, so we will not be providing multi-lingual signs about the availability of free interpretation services. MOME provides “I speak” cards in the 10 most common languages to members of the public who may be limited English proficient.

**J. MOME uses the following criteria to determine which documents are the “Most Commonly Distributed” and will be translated:**

- Is the intended audience for distribution of documents at least 150 or more individuals? If yes, move to the next question.
- Is the communication intended for the public at large about a program or public service provided by MOME? If yes analyze the potential audience, and if potential LEP individuals are included, consider translating. (E.g., Broadway in the Boros advertisement, posters for nightlife establishments.)
- If the communication is intended for a small segment of the population, are some members of that segment reasonably likely to benefit from translated materials? If yes, translate.

## VII. Training

- A. The Language Access Coordinator conducts training.

- B. The staff trained include: Film Office staff, Office of Nightlife staff, and the two public-facing reception employees. MOME tracks employees trained by unit.
- C. When a contractor's staff has a highly visible, public-facing role, we provide them training on language access too.
- D. Training focuses on how to use Language Line to request telephonic interpretation and when to consider and how to request translated materials.

## VIII. Record Keeping and Evaluation

- A. MOME's vendor provides monthly reports of usage of telephonic interpretation services and the language requested.
- B. MOME regularly audits its foreign language broadcast programming to ensure compliance with the Federal Communications Act and the NYC Media Production Handbook.

## IX. MOME Resource Analysis and Planning

- A. In addition to MOME's Language Access Coordinator, the Associate Commissioner for Strategic Communications ensures that public communications are in plain language.
- B. MOME now allocates \$5,000 to its contract with Language Line and \$5,000 to its contract with Lydia Callis (American Sign Language) per fiscal year. We have not exceeded those amounts, but we can budget more if necessary.
- C. In 2020, MOME established a program that provides advertising for film festivals and other kinds of media and entertainment events in community and ethnic newspapers. Since the inception of the program, we've provided 17 organizations with advertising in community and ethnic media newspapers for fiscal year 2021. Before the end of calendar year 2021, we've committed to providing ads for another 11 organizations.
- D. MOME considers local communities when it plans its radio and television programming and it contracts with some non-profit organizations that provide foreign language programming.

MOME's also considers language and nationality when it sponsors film festivals, ensuring that the City funds a wide variety of festivals presenting content in different languages.

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

- On MOME's website, we have [a link that explains](https://www1.nyc.gov/assets/mome/pdf/mome-permit-instructions-2020-02-19.pdf) how to request interpretation services for filling out the film permit application:  
<https://www1.nyc.gov/assets/mome/pdf/mome-permit-instructions-2020-02-19.pdf>.

## XI. Language Access Complaints

MOME 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 MOME.
- 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 the Language Access Coordinator at [languageaccess@media.nyc.gov](mailto:languageaccess@media.nyc.gov), by calling 311 (complaints to be forwarded to [languageaccess@media.nyc.gov](mailto:languageaccess@media.nyc.gov)), or by calling us at 212-602-7400. MOME established a dedicated email address for complaints at: [languageaccess@media.nyc.gov](mailto:languageaccess@media.nyc.gov). This email address is monitored by Lori Barrett-Peterson, Language Access Coordinator.
- Complaint data will be tracked quarterly and MOME will include information about complaints as part of our annual reporting.
- MOME has received no complaints to date.

How members of public can submit language access complaints, questions, and requests	Agency 311 Data (CY 2018)	Description of how complaints/requests were addressed
Currently, through 311. However, the public will also be able to submit language access requests through MOMÉ's website, via email.	# of language access complaints received via 311: 0	N/A
	# of requests for language access services via 311: 0	N/A

## XII. Implementation Plan Logistics

Language Access Goal	Milestones	Responsible Staff	Deadline
MOMÉ will post its updated LAIP publicly	In progress	Language Access Coordinator	May 26, 2021
MOMÉ trains its City Cleanup Corps greeters about language access		Language Access Coordinator	June 30, 2021
MOMÉ will renew its translation contracts with Language Line and Lydia Callis		Language Access Coordinator	June 30, 2021
MOMÉ will re-train all staff who create communications documents about plain language requirements		Language Access Coordinator	September 1, 2021



MOME will review the LAIP at least once every three years		Language Access Coordinator	TBD
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# 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



**NYPD**

New York City Police Department

**DERMOT SHEA**  
Police Commissioner

Haitian Creole  
 Italian  
 Bengali  
 Mandarin  
 Portuguese  
 Russian  
 Punjabi  
 Spanish  
 Fuzhou  
 Korean  
 Greek  
 Uzbek  
 Arabic  
 Polish  
 Japanese  
 Urdu  
 Cantonese  
 Hindi  
 Albanian  
 French

**NYPD LANGUAGE ACCESS PLAN**  
June 2021

# **NYPD LANGUAGE ACCESS PLAN FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS**



# I. LANGUAGE ACCESS COORDINATOR

The Police Commissioner has designated the Commanding Officer, Office of Management Analysis and Planning, to serve as the Department's Language Access Coordinator (LAC). The LAC supervises the Department's language access plan and institutes various measures to monitor the success of the plan. The language access plan is reviewed and updated as necessary. The plan is publicly available on the Police Department's website at the following web address: <https://www1.nyc.gov/site/nypd/about/about-nypd/language-access-plan.page>. As of the revision date of this document, the designated Language Access Coordinator is Deputy Chief Michael P. Baker, Commanding Officer, Office of Management Analysis & Planning.

## II. MISSION

The mission of the New York City Police Department is to enhance the quality of life in New York City by working in partnership with the community to enforce the law, preserve peace, reduce fear, and maintain order. The Department is committed to accomplishing its mission to protect the lives and property of all people of New York City by treating every individual with courtesy, professionalism, and respect, and to enforce the laws impartially, fighting crime both through deterrence and the relentless pursuit of criminals.

# DIRECT SERVICES

The services of the New York City Police Department are primarily non-programmatic in nature. The Department impartially enforces the law, protects lives and property, maintains peace, reduces fear and maintains order for the people of New York City.

The Department provides a wide array of direct services to the public, including, but not limited to:

- Investigating reports of crime;
- Investigating motor vehicle collisions, other than property damage only;
- Responding to sick or injured persons;
- Responding to other emergencies reported to “911” as necessary;
- Responding to “311” calls for service as necessary;
- Investigating missing persons;
- Enforcing violations of the law, both criminal and traffic, through summonses and arrests;
- Investigating domestic incidents;
- Mediating disputes;
- Recovering found property;
- Documenting lost property;
- Initiating fingerprint-based employment background checks as requested by residents;
- Issuing firearm licenses;
- Issuing certificates of conduct;
- Providing safety and security services for public schools, public housing developments, and mass transit facilities;
- Providing counterterrorism protection for the city;
- Hosting meetings with members of the community (e.g., “Build the Block” meetings as part of the Neighborhood Policing philosophy)
- Conducting outreach on various public safety related topics (e.g., domestic violence, crime prevention, etc.).

The Department's direct services may be provided in the field or at a police facility (e.g., precinct, housing public service area, transit district). In either case, the language access protocol remains the same. Officers are trained at the Police Academy and during in-service training to obtain language services as necessary when working with limited English proficiency (LEP) persons. Typically, officers utilize the Language Line contract, which provides language services by phone, or certified members of the Department to provide language services in person.

The decision about whether to use the Language Line or a certified interpreter on the scene is based on the circumstances (e.g., the language required, the availability of live interpreters, the exigency of the situation, etc.). In many cases, with the exceptions of both ongoing investigations and document translations, language services can be efficiently obtained through the Language Line service. The Language Line option is readily accessible in field by means of Department-issued smartphones with which all officers are equipped.

# III. GOAL OF THE NYPD'S LANGUAGE ACCESS PLAN

**T**he New York City Police Department recognizes the importance of effective and accurate communication between its employees and the communities they serve. Consistent with Title VI of the Civil Rights Act of 1964, the Omnibus Crime Control and Safe Streets Act of 1968, and Local Law 30 of July 2017, it is the policy of the New York City Police Department to take reasonable steps to provide LEP<sup>1</sup> persons with timely and meaningful access to the services and benefits that the Department provides to the degree practicable. When performing law-enforcement functions, members provide free language assistance to LEP individuals whom they encounter whenever necessary and whenever a LEP person requests language assistance services. It is the policy of the Department to inform members of the public that language assistance services are available, free of charge, to all New Yorkers. The Department provides these services as part of its community policing and enforcement efforts.

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*1 Limited English Proficient (LEP) persons refers to those persons whose primary language is not English and who are unable to effectively read, write, speak or understand English.*

# IV. LANGUAGE ACCESS ACCOMPLISHMENTS AND PROGRESS ON GOALS

## ACCOMPLISHMENTS

**S**ince the passage of Local Law 30 in 2017, the Police Department has made progress in a number of categories in regard to the provision of language access services. Notable accomplishments include:

- Translating several police department forms into the 10 most commonly spoken languages in New York City (as described in section VI(g) of this document);
- Translating police department domestic violence prevention brochures into the 10 most commonly spoken languages;
- Publishing a bulletin apprising all NYPD personnel of the availability of both document and in-person interpretation and outlining the procedure for requesting such services;
- Adding video translation capabilities to all the NYPD-issued smartphones, utilizing the Language Line contract;
- Adding Language Line access to all CISCO landline telephones located in NYPD facilities;
- Revising the posting entitled, “Free Translation Service Available” to include 23 languages, including American Sign Language (ASL) (see section VI(f) below);
- Enlisting the services of professional interpreters to provide direct language services at a citywide multi-lingual police reform and reinvention meeting.

# PROGRESS ON GOALS

In the 2018 Language Access Plan, the Police Department outlined three milestones intended for completion prior to the triennial revision of the plan. Each milestone has been completed either on or ahead of schedule.

<b>Milestone</b>	<b>Completed</b>	<b>Target</b>
Test and certify all officers in the Immigrant Outreach Unit who identify proficiency in a foreign language.	2019	2019
Test and certify all 911 call-takers who identify proficiency in a foreign language.	2019	2020
Translate the NYPD “Crime Stoppers” website in the 10 designated LEP languages. <a href="https://crimestoppers.nypdonline.org">https://crimestoppers.nypdonline.org</a>	2020	2021

# V. LEP POPULATION ASSESSMENT

The New York City Police Department has historically utilized the U.S. Department of Justice’s “Four Factor Analysis” to determine which LEP populations will be served as follows:

Factor 1 - Demographic Analysis: Pursuant to local law 30 enacted in July 2017, the Mayor’s Office of Immigrant Affairs and the Mayor’s Office of Operations identified ten languages as the designated citywide LEP languages: Spanish, Chinese, Russian, Korean, Bengali, Haitian Creole, Polish, Arabic, Urdu and French. The Department provides services to the entire City of New York and will use the ten designated languages for its language access policy and plan. Most of the Department’s commonly distributed documents will be translated into these languages, as practicable. Language services will continue to be provided as necessary, through Language Line and the Language Initiative Program described in Section IV - Service Provision Plan.

Factor 2 - LEP data tailored specifically to the agency: Language Line usage and 911 call records are the most accurate data regarding the LEP populations that the Department currently serves. Of the 8,309,011 calls to the 911 call center received by the Department in CY 2020, 280,091, or approximately 3.4%,

required language services. Of the 911 calls that required language services, 142,050, or 51%, were processed “in-house” by the Department’s Spanish speaking 911 call takers. Also in CY 2020, the Language Line processed 169,197 total calls requiring services in 99 different languages, a 36% increase in Language Line calls compared to CY 2017. Analysis of both the 911 call data and Language Line billing records indicates that the three most commonly requested languages in CY 2020 were Spanish, Mandarin Chinese, and Russian.

The Department determines the frequency with which LEP individuals come in contact with the language access program by conducting periodic examinations of Police Department records. In addition, the Department reviews billing statements from language service vendors regularly.

Factor 3 - Nature and Importance of Services: The Police Department provides a wide array of emergency services that involve life-threatening situations. It is not possible to compose a list of all the situations the police might encounter. Many serious situations to which the police respond involve crime. Providing language services to crime victims is the Department’s most important language access service. In many exigent circumstances,

the Department may need to utilize bilingual community members to assist in providing immediate services to LEP individuals to determine if a crime has occurred, to render or obtain medical treatment, and to apprehend perpetrators of crimes. Once a situation has been stabilized, however, the language services should be secured either through a Department employee certified by the Language Initiative Program or through Language Line.

*Factor 4 – List of Resources Designated for Language Assistance Services:*

- All employees are guided by Patrol Guide procedure 212-90, “Guidelines for Interactions with Limited English Proficient (LEP) persons.” This policy outlines the tools, resources, etc. that are available to facilitate the provision of language services to all New Yorkers.
- Contracts are in place for telephonic and video interpretation through Language Line Solutions and for document translation through Accurate Communications.
- The smartphones assigned to all officers have been programmed with the Language Line number, providing access to telephonic and video interpretation services in the field.
- Special dual-handset/CISCO telephones in every precinct, housing police service area, and transit district provide access to the services of Language Line.
- The Language Initiative Program administered by the Chief of Personnel provides a corps of department employees who have been certified as language interpreters.
- Since September 2009, the Department has posted multi-language signs to advise LEP individuals of the availability of free translation services. These signs are prominently displayed in all publicly accessible Department facilities.
- Primary language identifier activity log inserts, which are also accessible to all uniformed officers on their Department-issued smartphones, enable officers to quickly identify an individual’s primary/preferred language.
- The Department posts various items on its website that are translated into foreign languages, including information regarding public/police encounters, crime prevention, and domestic violence. An online translation tool converts the homepage of the website into more than 100 languages.
- Initial and in-service training provided to Department employees explains the available language access tools and resources and how to request and utilize them.



# VI. PROVISION OF LANGUAGE ACCESS SERVICES

## A. LANGUAGE LINE SERVICES

The New York City Police Department provides language services by the phone, in the field, and at police facilities. The Department will continue to utilize its contract for Language Line Services. In doing so, the Police Department is able to provide its vital services (e.g., taking crime complaints, preparing arrest reports, retrieving vouchered property, etc.) in over 100 languages. The NYPD Communications Division administers Language Line operations for the Police Department. Language Line Solutions is a private vendor that provides interpretation services in over 180 languages. In CY2020, the Police Department expended approximately \$794,000 on Language Line services across all its contracts (e.g., 911, Domestic Violence, Internal Affairs, etc.) with an average call length of 10 minutes. The most common language requested was Spanish, followed by Mandarin Chinese and Russian. The Department currently utilizes Language Line only for telephonic and video

interpretation. Documents translation is provided by another Department vendor, Accurate Communications or, in exigent circumstances, by employees that have been certified through the Language Initiative Program. In CY2020, the Police Department expended approximately \$12,500 on document translation by Accurate Communications.

In addition to Language Line services, the Communications Division has the capacity to provide in-house direct language services by bilingual staff to 911 callers. An analysis of 911 call data shows the demand for Spanish language services is most common. Accordingly, the 911 staff comprises a large number of bilingual Spanish-speaking operators who have been certified as part of the Language Initiative Program pursuant to the milestone set forth in the NYPD's 2018 Language Access Plan.

## B. LANGUAGE INITIATIVE PROGRAM

The Chief of Personnel administers the Language Initiative Program. The New York City Police Department established the Language Initiative Program in 2002 to create a corps of interpreters who could be called upon in particularly complex cases and to increase the pool of personnel capable of providing language services in less commonly spoken foreign languages for counterterrorism, investigative, or other police purposes. Under this program, members of the Department, both uniformed and civilian, volunteer to use their language skills to improve the efficiency of police operations. Volunteers certified as members of the Language Initiative Program are tested in their ability by the Berlitz Corporation, a language training and certification company.

Volunteers are tested in three categories: reading, writing, and speaking. To be added to the roster for any category, the member must pass at the “Intermediate” level.<sup>1</sup>

Officers’ language skills are entered in their personnel records, which are available to Operations Bureau personnel and can be accessed at any time. The majority of requests for interpreters within the Department is made through the Operations Bureau; The Personnel Bureau and the Intelligence Bureau also have the capability to process requests for interpreters. As of May 2021, the Language Initiative Program had certified 4,127 interpreters, providing interpretation services in 93 different languages, including American Sign Language.

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<sup>1</sup> Intermediate is defined by Berlitz as, “Comfortable in ordinary social and professional situations involving several native speakers, and can handle an extended phone conversation. Can follow the general meaning of a meeting and ask for explanations as well as express opinions, ideas and demands. A person at this level can deal with more demanding situations such as consulting a lawyer, CPA, or other professional.”

## C. USE OF NON-CERTIFIED INTERPRETERS

The Department encourages employees who are not certified, but nonetheless possess language skills, to use their abilities to speak foreign languages in circumstances when use of Language Line or a certified employee is impractical, including rapidly evolving situations or other exigencies. This use of bilingual employees to provide police services in a foreign language allows the Department to serve the public with a timelier and more personalized response, while simultaneously reducing inconvenience to LEP persons.

Generally, non-certified employees may provide interpretation service if they reasonably believe that they have sufficient language proficiency to accurately interpret, given the surrounding circumstances of the LEP person's interaction with the police. If at any time during the interpretation the employee determines that his or her level of language proficiency is insufficient to complete the interpretation, the Language Line or Language Initiative Program should be used.

When determining if they should provide interpretation services, non-certified employees should consider such factors as whether or not the LEP person is in police custody, the gravity of possible outcomes of the interaction, and the exigency of the

situation. For instance, absent approval from a uniformed supervisor, a non-certified employee should not perform interpretation for an investigative assignment, such as a custodial interrogation. Similarly, absent exigent circumstances, officers responding to domestic violence calls for service are required to use certified personnel or Language Line interpreters to verify the details of the incident.

There are many exigent or emergency circumstances, including determining if a crime has occurred, rendering or obtaining medical treatment, and apprehending perpetrators of crimes, when the Department may need to utilize bilingual community members, including family members, to facilitate the provision of immediate services to LEP individuals. It may also be appropriate to use bilingual members of the public to interpret during a non-emergency encounters if the use of such an interpreter will expedite the delivery of police services without adversely impacting the quality of the services provided. When a bilingual member of the public is readily available and willing to provide language services, the NYPD employee will consider the following four factors to determine if the use of the non-employee interpreter is appropriate:

- a. The nature and importance of the police services being provided
- b. The apparent capacity of the interpreter
- c. The apparent impartiality of the interpreter
- d. The sensitivity/confidentiality of the topic

If any of these factors suggests that the use of the member of the public to interpret is not appropriate, employees should use Language Line services or a certified member of the service.

During domestic violence situations, members of the service should not use bystanders and family members to interpret, both to preserve privacy and to minimize the risk of a faulty translation, which may result from a fear that family member will be arrested or other personal biases. Bystanders may be used temporarily for translation in life-threatening situations when there is no feasible alternative. Once the situation is stabilized, responding officers must use a bilingual member of the Department or Language Line services to verify the details of the domestic incident before finalizing the call.

The alleged offender in any type of incident, including domestic violence, should not be used as an interpreter. Using an alleged offender to interpret may increase

the risk of purposeful mistranslation and give the alleged offender control of the situation. As with all interviews, to the extent possible, the victim and offender should be interviewed separately and in a private setting. Victims may be reluctant to reveal details of an incident if the victims believe the offender may overhear their statements.

As possible victims or witnesses to an incident, children should be interviewed; absent exigent circumstances, however, a child should not be used as an interpreter for any kind of police incident, including domestic violence. Some words and concepts are difficult for children to understand, let alone translate into another language. Interviewees are not likely to be forthcoming if a child is interpreting and will be especially hesitant to reveal details of a sexual assault to a police officer through a child.

The Police Department prioritizes the use of certified interpreters through the Language Initiative Program for all translations with respect to custodial interrogations and other investigative purposes. The information outlined in this section is codified in policy and may be found in the NYPD Patrol Guide, publicly available online: (<https://www1.nyc.gov/site/nypd/about/about-nypd/patrol-guide.page>).

## D. DOMESTIC VIOLENCE

In 2015, the Department launched a pilot program in three precincts to enhance language assistance services to LEP persons involved in domestic violence incidents. The initiative was expanded in 2016 to additional precincts and was expanded citywide to all precincts in November 2017. Officers handling family-related calls for service must now make a determination as to whether language assistance is needed or requested by one of the parties. If so, the officers will use either a certified member of service or a Language Line interpreter, absent exigent circumstances. In addition, officers must document whether such services were needed, and, if so, whether and how they were supplied.

## E. EVALUATION OF LANGUAGE ACCESS NEEDS OF THE SERVICE POPULATION

The Mayor's Office of Operations and Office of Immigrant Affairs with the Department of City Planning designated ten languages as the most commonly spoken LEP languages in New York City. These languages -- Spanish, Chinese, Russian, Korean, Bengali, Haitian Creole, Polish, Arabic, Urdu and French are the baseline languages in the Mayor's Language Access Policy and Implementation Plan. The New York City Police Department will implement its language access plan using the ten baseline LEP languages for New York City and, if needed, languages beyond the ten (see section "H" below). Based on the findings from "Factor 2 - LEP data tailored specifically to the agency" noted in section V above, the three most commonly spoken languages in New York City are Spanish, Mandarin Chinese, Russian.

## F. PRIMARY LANGUAGE IDENTIFIERS

The NYPD has produced a poster to inform the public about available cost-free translation services. The poster is entitled, "[Free Translation Service Available](#)" and is printed in 23 foreign languages. The poster is posted in publicly accessible areas of Police Department facilities in precincts, police service areas, transit districts, tow pounds, property clerk, etc. An LEP person can point on the poster to the language he or she speaks, so an NYPD employee can inform the Language Line interpreter which language is needed. Other than reception areas, most Police Department facilities are not publicly accessible, and therefore signage is not required in those areas. The poster may also be viewed on the Police Department's public-facing webpage.

All uniformed members of the service are issued a one-page activity log insert—which is also available on officers’ smartphone. Like the poster, the insert is designed in a format that allows the LEP person to point to the language he or she speaks, so officers can quickly identify an individual’s primary language.

## G. TRANSLATION OF WRITTEN MATERIAL

**M**ost Department forms are prepared exclusively by Department employees and therefore, do not require translation. Of the Department forms that contain sections for the members of public to complete, most must be referenced later by other parties, including clerical staff, investigators, court staff, etc. which makes completion of these forms in an LEP person’s primary language impractical. The public portions of these forms can be completed by NYPD employees using information obtained through an interpreter. Page 2 of Domestic Incident Reports, the personal statement of the complainant, can be completed by the complainant in his/her primary/preferred language. The Domestic Incident Report is a standardized form issued by New York State.

The Office of Management Analysis and Planning (OMAP) must grant approval of any materials that are expected to be distributed to the public by any unit within the Department. OMAP examines these new forms and documents (e.g., pamphlets, flyers, notices, posters, etc.) and evaluates the suitability of translating these documents into the ten most commonly spoken languages

and any other languages that may be required to reach a particular community. The Department utilizes the services of an outside vendor, Accurate Communications, as the preferred method for document translation. In exigent cases, written material can be translated by a certified employee through the Department’s officially sanctioned Language Initiative Program. The translation will then be verified by a second certified member of the Language Initiative Program. Each translation will be written in plain language that is easy for LEP persons to understand. Requests for translation of written material are forwarded to and managed by the Chief of Personnel.

As of the last Language Access Plan report, published in 2018, several forms and brochures that are used on a recurring basis have been translated into the ten most commonly spoken languages. They are:

- Consent to Search
- Consent to Submit DNA Sample
- Instructions for Obtaining a Certificate of Good Conduct
- Instructions for Obtaining a Non-Criminal Fingerprint Card
- Domestic Violence Outreach Brochures

## H. COMMUNITY OUTREACH

The NYPD's Community Affairs Bureau has a subunit--called the Immigrant Outreach Unit--that provides outreach to New York City's immigrant population. Through presentations on Police Department policies and programs, events, initiatives, incident response, etc., personnel assigned to the unit are tasked with conducting outreach to immigrant communities citywide. Because a number of the unit's members were at one time immigrants themselves, they often speak foreign languages and are able to form relationships through shared experiences. Through these efforts, the Immigrant Outreach Unit is able to provide critical information to immigrant communities and enhance collaboration between the immigrant population and the Police Department. If the personnel assigned to the unit do not speak the language needed, Language Line services or a certified employee from elsewhere in the

agency are utilized.

In addition, the unit organizes the NYPD Police Commissioner's Youth Soccer & Cricket Leagues for youths between the ages of 14 and 19, which gives thousands of immigrant youth the opportunity to participate in a positive program, bringing the police and community closer together. The Immigrant Outreach Unit works to build and maintain relationships with community leaders and organizations in emerging immigrant communities. Additionally, the Unit coordinates with other Police Department bureaus and city agencies to address the needs and concerns of the community. In 2019 the Police Department completed a milestone identified in 2018 Language Access Plan testing all of the Immigrant Outreach Unit's members who identified proficiency in a foreign language and certifying them as interpreters.

## I. WEBSITE

The Police Department posts various items on its website that are translated into foreign languages, including information regarding public/police encounters, crime prevention, and domestic violence. The Department's website can be accessed by an online translation tool in over 100 languages.

## J. POLICIES AND PROCEDURES

In providing language access services and ensuring its availability to all New Yorkers, members of the Police Department are guided by Patrol Guide procedure 212-90, “Guidelines for Interactions with Limited English Proficient (LEP) persons.” The procedure includes important definitions, primary language determination, how to request language services (e.g., Language Line, document translator, in-person interpreter, etc.). The procedure is publicly available on the NYPD webpage and may be viewed at the following link: (<https://www1.nyc.gov/site/nypd/about/about-nypd/patrol-guide.page>).

## K. LICENSES, PERMITS, AND REGISTRATIONS

The New York City Police Department currently issues a total of nine licenses, permits, and registrations (LPR). They are:

- Handgun License
- Rifle/Shotgun Permit
- Firearm Dealer’s License
- Rifle/Shotgun Dealer’s License
- Small Arms Range Designation License
- Special Theatrical Rifle/Shotgun Permit
- Press Pass Credential
- Parade/Protest Permit
- Sound Device Permit

Given the uncommon nature of these LPR’s, none of the forms associated with these functions have been selected for direct translation. However, every LPR issued by the NYPD is accessible to Limited English Proficient (LEP) individuals by translation signage, certified NYPD employees, or the Language Line contract (audio and/or video). The Parade/Protest Permit may be completed in multiple languages online by the NYC “e-Apply” system, prior to being forwarding to the NYPD.



## VII. TRAINING

The Chief of Training created a training curriculum for both police academy recruits and in-service members based on the Department's Language Access Plan to inform or reacquaint officers of the procedures to follow in obtaining translation services for LEP individuals while in the field or in a Department facility. Training occurs in the academy for police recruits and during roll-call for in-service members. In CY2020, 1,507 newly hired recruits and 106 newly hired Police Administrative Aides (PAA) received initial language access training. Roll calls for patrol officers assigned to precinct, police service areas and transit districts occur at the beginning of each shift or three times within a 24-hour period. Training sessions for other police personnel not assigned to precincts, police service areas or transit districts are based on the working schedules of each respective unit. In-service training sessions are specifically designed to train personnel in how to identify an individual's primary language, how to use the Department smartphone and dual hand-set/CISCO telephone, how to use telephonic/video interpreters, and how to properly use certified and non-certified interpreters. In-service training sessions concerning elements of the Language Access Plan and existing policy are conducted any time policies or procedures are amended.

Public facing civilian employees also receive training regarding the Department's Language Access Plan during their initial orientation training and semi-annually thereafter through the command level training program. All training is conducted by police academy instructors and/or a particular command's training officer/training supervisor.

## VIII. RECORD KEEPING AND EVALUATION

Some records of the language services provided by the Police Department are obtained through billing statements received by Language Line services. Others are maintained by the Chief of Personnel regarding the use of police personnel for translation or document translation services. Both these sources of data are monitored and reviewed periodically. In addition, complaints that are received from members of the public (e.g., 311, Internal Affairs Bureau, etc.) are reviewed to monitor the efficacy of the Police Department's language access program (see section XI below).

## IX. RESOURCE ANALYSIS AND PLANNING

The New York City Police Department will continue to utilize its citywide contract for Language Line Services. Language Line is a private vendor that provides translation services in over 180 languages. Department point-of-service facilities (e.g., precincts, housing police service areas and transit districts, etc.) can access the Language Line service using specially equipped dual handset/CISCO telephones available in every precinct, housing police service area, and transit district. These telephones allow police personnel to obtain immediate interpretation services for LEP individuals. Patrol officers are also equipped with Department cellular phones programmed with Language Line’s application and phone number. These smartphones provide all sworn personnel with the ability to acquire video and telephonic interpretation services in the field.

Any new policies or forms will be evaluated for language access needs by OMAP, while new programs or initiatives will be evaluated by the NYPD unit or entity undertaking them.

## X. OUTREACH AND PUBLIC AWARENESS OF LANGUAGE ACCESS SERVICES

As a supplement to the activity log inserts previously described, the Department has designed a palm card to remind the public of the importance of understanding police officers during police/civilian interactions and to advise them of the ready availability of free interpretation services. In conjunction with our partners, the Department began circulation of the cards in 2018. It is anticipated that some 60,000 cards were distributed in 2018.

In addition, a poster entitled “[Free Translation Service Available](#)” is visibly displayed in the reception area of all precinct/transit district/police service area commands, as well as other police facilities accessed by the public (e.g., tow pounds, property clerk offices, etc.), ensuring that crime victims and visitors are aware of language access services, including American Sign Language.

# XI. LANGUAGE ACCESS COMPLAINTS

**P**ublic complaints regarding language access are received through 911, 311, the Civilian Complaint Review Board (CCRB), or directly to the NYPD Internal Affairs Bureau. The allegations are classified internally as one of the following:

- Failure to provide adequate translation/interpretation services to persons with limited English proficiency;
- Failure to provide a sign language interpreter/auxiliary aids and services to a Deaf or hard of hearing person.

The Internal Affairs Bureau is responsible for tracking and resolving complaints pertaining to language access. If an allegation is substantiated, it will result in the subject officer receiving instruction, retraining, and/or discipline. In CY2020, a total of 15 language access complaints were received through all complaint channels and were disposed as follows: Exonerated: 5, Unfounded: 4, Unsubstantiated: 5, Pending: 1.

# XII. EMERGENCY PREPAREDNESS

**T**he NYPD will continue to utilize all resources described here (e.g., vendor contracts, bilingual staff, etc.) during emergency crises to ensure priority messaging is disseminated to LEP New Yorkers citywide. This crisis communication includes, but is not limited to, use of social media, announcements via public address systems, and use of the news media.

# XIII. IMPLEMENTATION PLAN LOGISTICS

**T**he Police Department has significant and meaningful mechanisms in place to provide the entire LEP population in New York City with emergency, and if necessary, ongoing police services. As noted, the Department currently administers a Language Initiative Program and maintains contracts with Language Line and Accurate Communications, and provides training on language access. Furthermore, the Police Department is fully accessible

to LEP individuals for all purposes, including licenses, permits or registrations. The Language Access Coordinator (LAC) will continue to coordinate with all internal units and external agencies as required to ensure the prompt and effective delivery of language access services to those who live, work, and visit the City of New York.

## XIV. MILESTONES

In order to advance language access services and improve upon current policy and practice, the Police Department has pledged to complete the following milestones in advance of the 2024 revision of its Language Access Implementation Plan.

Milestone	Entity Responsible	Deadline
Implement annual language access training video for all public-facing agency staff	Language Access Coordinator	2022
Translate the NYPD Language Access Plan into Spanish, Chinese, and Russian	Language Access Coordinator	2023
Make data on language access publicly available on the internet	Language Access Coordinator	2024

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## **LANGUAGE ACCESS IMPLEMENTATION PLAN**

*March 31, 2021*

## **OATH LANGUAGE ACCESS PLAN**

### **I. NYC Office of Administrative Trials and Hearings (OATH)**

Language Access Coordinator (LAC):

Marisa L. Senigo

Deputy Commissioner for Public Affairs & Communications

[msenigo@oath.nyc.gov](mailto:msenigo@oath.nyc.gov)

(212) 933-3080

Find information related to language access and the agency's LAC on the OATH website: <https://www1.nyc.gov/site/oath/about/language-access-plan.page>

### **II. Agency Mission and Background**

#### **Overview:**

The Office of Administrative Trials and Hearings (OATH) is the City's central independent administrative law court. OATH is currently comprised of two separate divisions which are responsible for hearing disputes on different types of cases. The divisions include:

1. The OATH Trials Division
2. The OATH Hearings Division

Additionally, OATH provides professional training and CLE courses for the City's Administrative Law Judges, Hearing Officers and OATH Practitioners through the [Administrative Judicial Institute \(AJI\)](#). OATH also provides conflict resolution support and resources, including offering free workplace mediation to City employees and City agencies, as well as some public-facing mediations and restorative practices through [The Center for Creative Conflict Resolution](#).

#### **Vision Statement: Future of OATH**

OATH was established as an independent Charter agency with the mission to provide fair and unbiased administrative trials and hearings to the City's residents, businesses and agencies. With a focus on providing convenience to the New Yorkers who are summoned to its courts, OATH has undertaken a transformation of administrative law adjudications. OATH has redesigned all of the rules, procedures, forms and documents across its hearings division, with the aim of making the hearing processes standard and understandable regardless of which of the various City enforcement agencies issued the summons. Having all hearings conducted by OATH, thus achieving the goal of having one summons, one hearing, and one process, will provide individuals and businesses with the opportunity to deal with summonses issued by any City agency before an independent and impartial administrative law court that has one uniform set of procedures that will become familiar to all.

## **1. The Mission of OATH**

The mission of OATH is to provide fair and timely hearings on the cases that are filed with it by New York City's various agencies, boards and commissions. At its Hearings Division, OATH strives to hear cases fairly and efficiently while providing the public with access to justice. OATH's Trials Division hears cases equitably, with fairness to all parties appearing before it.

Some additional details are set out below.

### **OATH Trials Division**

The Trials Division is allowed by law to hold administrative hearings on cases brought by any of the City's agencies, boards or commissions. Administrative Law Judges conduct OATH Trials. Most of the cases heard by the OATH Trials Division are complex cases that require full trials. The Trials Division is responsible for hearing disciplinary cases relating to the City's more than 325,000 civil servant workforce. OATH also holds trials on a diverse range of administrative matters including: human rights and discrimination cases, car seizure cases, license revocation cases, and complex contractual disputes, among other types of cases.

### **OATH Hearings Division**

The OATH Hearings Division conducts hearings on summonses issued by nearly every single enforcement agency. OATH, however, is not the administrative court that handles parking tickets. OATH Hearings are conducted by Hearing Officers. In the OATH Hearings Division, hearings are conducted on alleged quality-of-life and public safety violations that can be filed by 16 different City agencies, such as the Departments of Sanitation, Buildings, Fire, Environmental Protection, among others. In addition, OATH holds hearings on summonses issued by the Taxi and Limousine Commission (TLC), the City's Police Department and the Port Authority of New York and New Jersey for alleged violations of TLC and other City rules. OATH also holds hearings on summonses issued by the Department of Health and Mental Hygiene (DOHMH) regarding alleged violations of the City's Health Code and other laws affecting health. As of August 22, 2016, OATH is also responsible for conducting hearings on all summonses issued by the Department of Consumer Affairs (DCA). As of June 2017, OATH also became responsible for adjudicating decriminalized quality of life summonses that used to go to criminal court and are issued by the NYPD and Parks Department. These summonses are subject to the Criminal Justice Reform Act of 2016. The law also mandates that OATH provide community service option for these summonses. The option is satisfied by respondents either before or after the hearing by completing either a 1 hour or 2 hour online e-learning module that teaches respondents why these quality of life charges are against the law and the negative impact that the violating behavior has on our communal environment and quality of life. If respondents have cases that require four or more hours of community service, the program is administered through OATH's Center for Creative Conflict Resolution with the respondents participating in a restorative "circle" facilitated by Center staff. All community service offerings can be completed in at least 10 languages. The community service e-learning module is now available in the top ten languages and all restorative circles can be conducted with the assistance of over the phone translation services in up to 250 languages if any of the participants require the session be conducted with that language assistance.



## **2. The Direct Public Services Offered by OATH**

### **Overview of the Direct Public Services Provided by OATH**

The agency does not provide basic city services, such as government benefits but OATH does provide direct public service in that it provides New Yorkers with due process rights and the forum at which someone charged with committing a violation has the right to offer their defense to those charges. In this way, OATH provides direct public service at its trials and hearings and through the operations of its Clerk's Office. It also provides some direct public services through its Help Center, which provides substantive help sessions to self-represented respondents and small businesses who appear to fight summonses at the OATH Hearings Division.

### **Details Regarding the Direct Services Provided by OATH**

The direct public services offered by OATH include public services offered at trials, at hearings, at Help Centers and by its Clerks Office. These services are described below:

- ***Trials Division:*** OATH holds trials for City agencies, boards and commissions. Some details about the trial process are:
  - Before a trial takes place, an OATH Administrative Law Judge (ALJ) usually discusses the case with the parties. That discussion is called a settlement conference. Sometimes cases are settled this way. If so, there is no need for a trial.
  - If the case is not settled, a different ALJ hears the case by listening to witnesses and reviewing other evidence from each side. This is a trial. OATH offers limited-English proficient (LEP) persons free interpretation services at trials. Sign language interpretation is also provided for free upon request, but must be requested in advance. Some cases have in-person simultaneous professional interpretation, other cases have telephonic consecutive interpretation. In rare cases where the respondent is an LEP, and a witness is also a LEP, we may require our vendor to provide two simultaneous interpreters (in some instances, in two different languages) at the same time.
  - After the trial, the ALJ writes a decision. In some kinds of cases, the ALJ recommends (suggests) to the head of the agency that referred (sent) the case what action should be taken. In other kinds of cases, the ALJ makes a final decision that can only be appealed to the New York State Supreme Court.
- ***Hearings Division:*** The OATH Hearings Division adjudicates (issue decisions) on summonses that have been issued by the City's various enforcement agencies.
  - When a City agency writes a summons, the person or business named as "respondent" on the summons must contact OATH to take care of the summons.

- Some summonses can be admitted to and paid without attending a hearing; however, other summonses require the respondent to attend a hearing at the OATH Hearings Division. OATH offers Limited-English proficient (LEP) persons free interpretation services at all hearings.
- If the person or business named as the respondent is going to appear at the OATH hearing without representation, they are eligible to have a help session at the Help Center. All Help Center sessions can be conducted in up to 250 languages using the agency's telephonic interpretation services.
- If the person or business named as the respondent wants to contest (fight) the charges contained in the summons but doesn't want to come to a hearing at OATH in person or OATH offices are closed due to an emergency such as the COVID-19 pandemic, cases can be resolved by submitting a defense to the charges (and thus having a hearing) online, by mail or over the phone. OATH offers limited-English proficient (LEP) persons free interpretation services for these types of hearings.
  - OATH will accept defenses that are written in foreign languages and have those written defenses translated by a third party vendor, free of charge, before the defense is assigned to a Hearing Officer for adjudication.
  - OATH offers free, professional over the phone interpretation in up to 200 languages for Hearings by Phone and Hearings in Person.
- After a hearing is held, the person or business named on the summons gets a written decision that says if the person or business won or lost the case (in other words, if the case was "dismissed," or found "in violation").
- OATH Hearings Division also has an Appeals Units which decides appeals of hearing decisions. An appeal may be filed by the party who lost the case. This may be the person or business named as "respondent" on the ticket or the City agency that wrote the summons and filed it with OATH for a hearing. To appeal, the party (person, business, or City agency) that disagrees with the decision sends an appeal application to the OATH Hearings Division and to the agency that issued the summons. The party writing the appeal must say why, in its view, the hearing decision was wrong. The Rules for appealing cases can be found on the OATH website.
  - OATH now makes appeal application forms available in up to ten (10) languages. OATH also offers appeals online.
  - Under LL 30, since 2018 OATH has increased the number of languages that it makes its forms available in to ten (10) languages. However, respondents will still be able to submit written defenses, appeals and forms in any languages, regardless of whether a form is provided in that language. Respondents will be alerted to this fact with notices on the website and on form pages.
  - When OATH accepts forms written in a foreign language, it has the form translated into English by a professional, third party vendor, free of charge to the respondent before it is given to the appropriate unit for further action.
- When a hearing decision is appealed, both parties (the person or business

named on the ticket and the City agency) receive a written appeal decision in the mail that says who won or lost the appeal.

- OATH has explored the idea of having its hearing decisions and appeals decision translated into the languages used by the respondent at the hearing. However, due to the nuanced nature of administrative law decisions, fact that decisions are subject to appeal and Article 78 review by the State Supreme Court, OATH does not have a way to do this without possible adverse legal affects in lawsuits filed against OATH for its decision or appeal in a matter.

### ***OATH Help Centers at all Hearings Division Office Locations***

OATH, as an administrative law court, is meant to be accessible and a court where one can go and be self-represented. No representatives, attorneys or expeditors are necessary. However, many people, especially immigrants, may feel as though they do not understand the proper way to handle a summons when they receive one. To ensure that both the respondent and agency are on equal footing and can both come prepared to their hearings, in 2017 OATH established Help Centers at every Hearing Division location to provide unrepresented persons with legal information and other resources so that they can handle their case on their own. All Help Center locations are staffed with Procedural Justice Coordinators, the Help Centers are overseen by the OATH Ombudsperson. Procedural Justice Coordinators have access to and have been trained on and use over the phone interpretation which is available in over 200 languages when they encounter an LEP at the Help Center.

- The Help Centers help unrepresented persons to: understand the charges against them; learn their legal rights; learn the meaning of legal terminology; navigate the procedural process; fill out necessary forms; understand the nature, methods and format of hearings; request a reschedule date or an adjournment; file an appeal; vacate a default judgment; navigate the rules of the City agency that issued the summons so that they understand what is and what is not allowed; and more.

### ***OATH Clerks Office***

Clerks in the Clerk's Office are responsible for assisting those respondents who come to OATH for in-person hearings or call OATH with questions about the status of their case or seek information about the options available to them. Clerks also manage the hearing calendar for the OATH Hearings Divisions; they field requests to reschedule hearings as well as help cases flow throughout the day by making sure OATH's Hearing Officers have the case files and other necessary materials needed to conduct hearings in an efficient, fair and orderly manner. The Clerk's Office is also responsible for accepting payments, processing penalties, and mailing out the Hearing Officers' decisions and other notices. OATH Clerks can be reached by calling OATH's helpline at 1-844-OATH-NYC, by email at [ClerksOffice@oath.nyc.gov](mailto:ClerksOffice@oath.nyc.gov) or by visiting an OATH Hearing Center in person.

### ***Clerks at Trials Division***

Among other jobs, the OATH Calendar Unit clerks get interpreters for LEP persons. This happens most often in vehicle-seizure trials and in trials in which taxi drivers might lose their licenses.

### ***Clerks at Hearings Division***

Clerks work at desks in public waiting areas and also respond to questions from the public by phone. Clerks are trained on, and use, Language Line to communicate in

over 200 languages with LEP respondents who call over the phone and who appear in person. The public can get information and assistance from clerks on many topics including the following:

- Signing in for hearings (at that time, the clerk will arrange for an interpreter for the hearing, if needed).
- Getting a new hearing date.
- Getting information on the status of their cases.
- Getting information on penalties they need to pay.

In addition, OATH's Interactive Voice Response (IVR) telephone system (1-844-OATH-NYC) provides full information to the public in 4 different languages, with menu options in 8 different languages. Information contained in the IVR includes recorded information about the hearing and appeal processes. For most cases, the IVR also provides callers with case-specific information regarding the status of the case, the case outcome, outstanding payments and other information, if the caller has their summons number or their Trials Division docket number.

### **III. OATH's Language Access Policy and Goals**

#### **1. The Goals of OATH Language Access Plan**

The overall goal of OATH's Language Access Plan (LAP) is to provide language access services so that persons with limited English proficiency (LEP) have meaningful access to OATH's direct public services. This includes making sure that LEP persons can get information about OATH's direct public services. (See Point I.(b) above for description of OATH's direct public services.)

Part of this goal is to provide a welcoming environment to LEP persons, including an environment that makes it easy for OATH employees to communicate with members of the LEP community. OATH will work towards providing seamless communication with LEP persons. More specific goals are set out below.

#### **2. Language Access Policies**

OATH has a strong commitment to language access and has even codified its policy of everyone's right to language assistance services in its own agency rules. OATH understands that language access is a vital part of providing true due process and access to justice at OATH hearings and trials.

See Hearings Division procedural rules (§6-03 Language Assistance Services):

<https://www1.nyc.gov/site/oath/hearings/subchapter-a-general-matters.page#6-03>

See Trials Division procedural rules (§1-44 Interpreters):

<https://www1.nyc.gov/site/oath/trials/chapter-i-subchapter-d.page#144>

### **IV. Agency language access accomplishments and progress on goals from previous LAIP**

OATH has already made significant progress towards its goal of providing language access services, as follows:

- OATH already has free professional interpretation services for all languages at trials and hearings.
- The Trials Division had provided interpretation at trials since the 1990s. Interpretation is usually done over conference phones using a professional, third-party interpretation service, such as Language Line Inc. The service is available in over 200 languages. However, an Administrative Law Judge may decide it is necessary to use a professional in-person interpreter and one will be scheduled for a future trial date.
- The Hearings Division started providing professional language interpretation service in November of 2007. When OATH took over the operations of the Health Department's (DOHMH) administrative hearings and the administrative hearings conducted by the Taxi and Limousine (TLC) in 2011, OATH ensured that these hearings had the same language assistance services it was employing for the other hearings it was already conducting.
- Interpretation for LEP persons at the OATH Hearings Divisions is done over conference phones, using a professional, third-party interpretation service, such as Language Line Inc. (unless the LEP person requests to use his or her own interpreter and the Hearing Officer will determine whether that request is appropriate under the circumstances).
- OATH clerks at check-in assist in identifying and then assisting LEP persons using over the phone interpretation services.
- Once the language is identified by a clerk or with the aid of the third-party interpretation service, OATH clerks arrange for an interpreter at the hearing.
- Clerks who receive calls from LEP respondents can use over-the phone interpretation to speak to the caller in their preferred language.
- Clerks who deal with LEP respondents in person have instruction sheets written in ten LEP languages. These sheets tell LEP persons that staff is contacting an interpreter to proceed with the hearing. Sometimes, the third-party interpretation service is used to communicate this fact.
- OATH reception counters and windows and OATH hearing offices have desk top signs, written in sixteen different languages, saying that free interpretation service is available to respondents.
- The OATH website has a built-in translation feature. This feature allows someone looking at any OATH website page or online form to translate that page or form easily.
- OATH has also designed a PowerPoint presentation that includes messages about OATH in at least the top six LEP languages, to be shown continuously on video monitors in OATH waiting areas where waiting area conditions permit.
- OATH has created "palm cards" that are handed out to respondents when they appear for a hearing in person. The palm card explains their right to a hearing

with an impartial hearing officer, what they can expect at the hearing, and what they should bring to the hearing. The palm cards are given to every respondent by a clerk when they check-in for a hearing and are available in top ten languages.

### **1. Accomplishments Since Previous LAIP**

- OATH has translated all essential documents into the top ten (10) foreign languages.
- OATH has translated all documents of key importance into the top ten (10) foreign languages.
- OATH has translated all informational and educational documents into the top ten (10) foreign languages.
- OATH translates promotional documents into certain applicable foreign languages, as determined by event partners and/or target audience.
- For all promotional documents that are not translated there is a boiler plate added that says the following in the top ten languages: *Need help in your language? Visit [nyc.gov/oath](https://nyc.gov/oath) or call 311 for assistance.*
- For all temporary signs that are not translated there is a boiler plate added that says the following in the top ten languages: *Need help in your language? Visit [nyc.gov/oath](https://nyc.gov/oath) or call 311 for assistance.*
- All translated documents on the OATH website are linked by the name of the language of the form in that language. It used to list the language in English: (Spanish) (Arabic) (Bengali) (Chinese), etc. Now the links appear like: (Español) (اللغة العربية) (বাংলা) (中文), etc.
- In 2020, during the pandemic, OATH began naming its hyperlinks to its online notices as the name of the notice, written in that language. For example, rather than just naming a link as the language itself such as (Español) (اللغة العربية) (বাংলা) (中文), etc. The link on some of our newest notices appear in the as the title of the notice written in the foreign language the notice is in, such as:

**OATH OFFICES ARE CLOSED (LAS OFICINAS DE OATH ESTÁN CERRADAS)**  
(OATH 办事处关闭) (OATH 사무소 폐쇄 안내) (ОФИСЫ OATH ЗАКРЫВАЮТСЯ)  
(BIURA OATH SA ZAMKNIĘTE) (TOUT BIWO OATH YO FÈMEN) (OATH كى فمى شى بن د  
(FERMETURE DES BUREAUX DU OATH) ( مقرات لمكتب ال م ح ك م ات ال د ا ر ي ة ل س ات )  
(OATH) (OATH অফিসগুলি বন্ধ আছে)

In the next reporting period it is OATH's goal to implement the above change to all of its essential documents, documents of key importance and informational or educational documents that already are translated but the title of the link on the website is not currently the title of the form translated

in the language of that form.

- OATH now displays posted signs using universal symbols, or English and Spanish.
- Where the text of a posted sign is informational and of key importance, OATH makes that text available in the six top LEP languages by other means, such as by PowerPoint presentation in waiting areas and/or by translated handouts.

## **2. How OATH Decides If Implemented Language Access Plan Is Successful**

To decide if OATH has successfully implemented its Language Access Plan (in other words, done everything it should do under the Plan) OATH staff:

- Looks at data from its language interpretation contractor to be sure that its interpretation service is being used on a regular basis.
- Conducts surveys of OATH staff about their experiences with LEP persons to be sure their experiences indicate they are effectively communicating with LEP persons.
- Conducts surveys of the LEP persons who use OATH translation services.
- Provides training to clerks and Hearing Officers on how and when to use interpretation services with respondents.
- Reviews the OATH Language Access Plan periodically.
- Has a Language Access Coordinator to implement and monitor compliance with the Language Access Plan on an ongoing basis.
- Maintains records of compliance with the Language Access Plan, including the submission of an annual report to the Mayor's Office of Operations.

## **V. LEP Population Assessment**

### **1. How OATH has Traditionally Determined its Foreign Languages**

Per Local Law 30, language access services must be provided in at least the top 10 LEP languages as those languages are determined by the Department of City Planning and also "as those languages are relevant to services offered by each agency".

To determine the top ten (10) foreign languages of its service populations, OATH has reviewed data on how many trials and hearings have been interpreted at each of its divisions, and the languages used during those trials and hearings. This data is a good indicator of the languages spoken by each division's service population because OATH's service population is in large part made up of persons who are required to contact OATH's divisions to respond to charges that have been filed at each respective division. OATH has also reviewed City Planning data. A review of translation usage data indicates that the top ten (10) languages used by OATH are the same languages that are mandated by Local Law 30 and no additional supplemental languages will be needed.

### **2. How OATH will execute the U.S. DOJ "Four-Factor Analysis"**

City entities have flexibility to decide what language assistance is appropriate for their service populations. In deciding, the agency must do an analysis based on the four factors set out by the U.S. Department of Justice (DOJ).

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

OATH can estimate the proportion of LEP persons in the service population by comparing the number of hearings that are done with professional third-party interpreters with the number of hearings that are done without interpreters. This will let OATH estimate the proportion of LEP persons in its service population.

***Factor 2: The frequency with which LEP persons come in contact with the agency.***

OATH can estimate the frequency with which LEP persons come into contact with OATH by reviewing reports from its interpretation contractor to see how often LEP persons have hearings. Those reports indicate the number hearings at OATH's divisions in which interpretation services were provided in a given period of time. The reports also indicate the languages in which the hearings were conducted. This will let OATH estimate the frequency (how often) LEP persons come in contact with each of OATH's divisions and the languages LEP persons were using.

***Factor 3: The importance of the benefit, service, information, or encounter to the LEP person (including the consequences of lack of language services or inadequate interpretation/translation).***

OATH looks at the importance of providing language assistance services to its LEP population in the following ways:

***Trials and Hearings:*** Fair and impartial trials and hearings are essential to due process. Accordingly, OATH's first step was to provide interpretation services at pretrial conferences and trials at the OATH Trials Division and at hearings at its Hearings Division. This is because it is important that LEP respondents:

- Make themselves clearly understood at trials and hearings.
- Understand everything that occurs at trials and hearings.

***Clerks:*** Clerks provide important information about OATH services.

- OATH provides interpretation services for conversations with its clerks.

***Documents:*** It is important that key documents, including key informational and website materials, be translated.

- OATH has translated all informational brochures about the hearing processes at each of its divisions into the top ten (10) languages spoken by respondents at those tribunals.
  - OATH has made its website translatable so that online information as well as online application forms can be easily translated into different languages.
  - Forms can be submitted in any language, regardless of whether or not the form is available in that language. In other words, OATH will have the foreign language submission translated free of charge to the respondent, regardless of the language it is submitted in.

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

OATH has designated the following resources for language assistance services:



**Personnel:** OATH has designated a Language Access Coordinator, who will be assisted by OATH staff as needed.

**Translation & Interpretation:** OATH has set aside money in its budget for contractors on an ongoing basis for the following purposes:

- Interpretation contractor for interpretations at trials and hearings and for interpretations of clerk conversations and settlement conferences.
- Translator contractor for translations of documents, brochures, signs and any document submitted by a respondent in a foreign language.

**Equipment:** OATH has already set aside money in its budget, or does so on an ongoing basis, for the following costs:

- Signage.
- Telephone equipment needed for interpretation services.
- Other equipment, including computers and formatting programs used for the creation of PowerPoint or other informational materials.
- Supplies such as toner, special brochure paper and folding machines to create, update and continuously provide, translated informational materials for the public in OATH waiting rooms.

**Training:** OATH staff is trained using the following resources:

- In conjunction with the interpretation contractor, employees are trained on using equipment needed for over the phone interpretation services.
- In conjunction with its interpretation contractor, employees are trained (and retrained as needed) on working with interpreters and on accessing and using the services.
- OATH's Administrative Judicial Training Institute (AJI) provides training on cultural competency, diversity and cultural sensitivity.
- All OATH staff receive training on when interpreters should be used.

**Surveys:** OATH will set aside staff resources as necessary to conduct periodic surveys of both the LEP persons and OATH staff who use OATH's interpretation and translation services to assess the quality and sufficiency of those services.

OATH takes the four U.S. DOJ factors into account on an ongoing basis, as it implements, revises and revamps its Language Access Plan.

### **3. Evaluation of Service Population LAS Needs**

OATH is the City's independent administrative law court. It typically receives more than 800,000 cases each year and holds hearings or trials in more than 300,000 cases. Since everyone in NYC is subject to the City's rules and regulations, everyone in the City is subject to being summoned to OATH if/when they break a City rule or law. For this reason, OATH's service population is the same as the city, as a whole. There are, however, some exceptions where supplemental languages are considered.

- **Taxi and Vehicle for Hire Cases**  
OATH adjudicates cases brought by the Taxi and Limousine Commission (TLC) and Port Authority of New York and New Jersey against TLC licensees. Starting in 2020, notices at OATH offices where these cases are heard are

translated into supplemental languages according to data from TLC's annual reports. According to the 2020 TLC Factbook, the top ten languages for drivers include the supplemental languages Hindi and Punjabi. Office closure signs and other notices regarding relevant OATH office accessibility or policies were translated into Hindi and Punjabi.

## **VI. Provision of Language Access Services**

### **What Has Already Been Achieved?**

The key parts of the Language Access Plan that have already been implemented are:

- *Over the Phone Interpretation:* Interpretation of trials and hearings is available for LEP persons in through the use of over the phone interpretation in up to 200 languages.
- Interpretation is also available for LEP persons who call or visit the hearings divisions with questions in over 200 languages through the use of over the phone interpretation.
- *Signs:* OATH has translated important permanent entry-way signs posted in its offices into Spanish or other LEP languages if space provides. Translated information in up to ten (10) languages at OATH offices has already been placed on Powerpoint-type presentations.
- *Documents:* OATH has translated key documents into the top ten (10) foreign languages.
- *Emergency communications:* The communications are done primarily through website postings and through calls to our Clerk's Office. Clerks provide information to LEP individuals during an emergency with the aid of the over the phone interpretation service it has contracted with. The OATH website is translatable and plain-language notices on the homepage page and other pages are posted during an emergency in the top ten (10) languages.
- *Media and Outreach:* OATH translates its press releases and event flyers into relevant languages. If, for instance, OATH is holding an event in Chinatown or in Flushing, then those documents are translated into Traditional Chinese. OATH also has in-person translators available at all events where there has been outreach to the service population. These documents are written in plain language before they are translated and then disseminated.

### **What More Should be Done to Expand Language Access at OATH?**

- *Website:* all forms are translated into ten (10) languages and available on our website. Currently, the name of the language is a link to the document; however, the document's title/name is not translated into that language. So, for example, there is an Appeal Application that is translated and the link to it just says "ESPANOL" rather than "SOLICITUD DE APELACIÓN". In 2021, OATH plans to translate all essential documents' titles into the top ten (10) language.
- *Forms and Notices:* All new notices that are not translated in all ten (10) languages will include boiler plate in top ten languages to direct people on where to go to find help in their language.

#### **1. Interpretation Services**

OATH will continue to provide interpretation both over the phone and at its offices. OATH already provides interpretation at trials, hearings, Help Centers and with clerk staff at its divisions.

OATH will use one of the vendors approved by the City (DCAS) for telephonic language interpretation service. OATH will use another DCAS approved vendor in the transcription service category as well as another DCAS approved vendor for document translation. OATH will use existing bilingual staff only on a limited, informal basis.

- OATH's over the phone interpretation service provider is currently Language Line.
- OATH's document translation interpretation service provider is currently Geneva Worldwide Inc.
- OATH's transcription service provider is currently Geneva Worldwide, Inc.
- OATH's plan does not include a formal role for bilingual OATH staff.
  - As an independent administrative law court, it is important for OATH to maintain its impartiality in the decision-making process. By using third-party independent contractors, OATH ensures that all hearings and trials that require interpretation proceed fairly and are impartial and neutral and that all documents submitted that require translation are translated accurately.

#### **How OATH Identifies Someone as an LEP Person**

- *Hearing Support Clerks:* All OATH locations have desk top signs, written in sixteen different languages, at its front desks. An LEP person can point to his or her language on the sign. This is one way that clerks will know that someone is an LEP person. In addition, clerks may determine a person needs language assistance by speaking with that person.
- *Hearings:* In most instances, Clerks tell the Hearing Officer or Administrative Law Judges (ALJs) before the hearing begins that an interpreter is needed at the hearing. If this has not been done, the Hearing Officer or ALJ will know someone is an LEP person because either (i) the person will ask for an interpreter after being asked at the very beginning of the hearing if an interpreter is needed, or (ii) the Hearing Officer or ALJ realizes when talking to the person that he or she is an LEP person.
- If the methods described above still do not help OATH staff find out what language the LEP person speaks, OATH staff will call the interpretation service. The interpreters will help find the correct language.

#### **2. Translation of Written Material**

OATH used Geneva Worldwide, Inc. to translate its informational brochures into the top ten (10) languages. All forms and applications can be found here:

<https://www1.nyc.gov/site/oath/hearings/hearings-division-forms.page>

Informational fact sheets on interagency processes can be found here (these are non-essential documents): <https://www1.nyc.gov/site/oath/about/fact-sheets-common-issues-case-types.page>

## How OATH will Identify Essential Public Documents

The term “essential public documents” is defined as documents which contain or elicit important and necessary information regarding the provision of “basic City services” and that are commonly distributed to the public. OATH’s documents do not fall within the literal terms of this definition because OATH does not provide “basic City services” (for example, it does not provide government benefits). Regardless of the words used to describe its documents, OATH does have key documents that have been translated (and other documents may also be translated). For example, a sign that says that free translation services are available is a key document that will be translated. A document that gives the public information about their rights, their options and the rules and procedures of OATH’s divisions are key documents.

Decisions about which documents will be translated, and in what order, and into what languages, are made by OATH’s Language Access Coordinator, in consultation with the Mayor’s Office of Immigrant Affairs, other OATH executive staff as needed, or as by mandate under Local Law 30. These decisions will also take into consideration the U.S. DOJ’s four-factor analysis.

Decisions about which documents will be translated will be made on a document-by-document basis. Different types of translation will be considered for different types of documents. For example, an approach that will be considered in connection with document types will be as follows:

- **Signs:** For posted signs, a universal symbol will be used or the sign will be in English and Spanish. Where the text of a posted sign is informational and of key importance, that text will be available in the top ten (10) LEP languages under Local Law 30 by other means, such as by PowerPoint presentation in waiting areas and/or by translated handouts.
- **Informational documents:** OATH uses annual data from the previous year to determine which languages it should use in its translations and reviews this usage on an annual basis in order to ensure that OATH is servicing its current LEP populations. When the text of a key document is translated, it will be translated into the top ten (10) languages used by OATH respondents. A review of 2019 usage of its interpretation and translation services from its vendors show that the top ten (10) languages used by OATH last year are the same ten (10) languages that are required under Local Law 30 and so no additional or supplemental languages are necessary for document translation. Informational documents are translated in order of request. If a group or individual or agency makes a request for a document to be translated, we will translate that document into at least that language but often many more at that same time. An example of this is our Fact Sheets, which are informational in nature, but often times about another agency’s processes, not OATH’s. For this reason, they are lower level priority document. See here: <https://www1.nyc.gov/site/oath/about/fact-sheets-common-issues-case-types.page>
- **Forms:** Forms are documents on which the name (the field name) of each blank area on the form is always the same, but on which one-of-a-kind

(unique) information is filled in. OATH has translated all forms for its Hearings Division into the top ten (10) languages. Even if the language used on a form is not one of the languages in which a form has been translated, OATH will accept that form and will translate the submission, free of charge to the respondent, before it is assigned to the proper unit for further action.

- **Quality Assurance Check:** OATH has done a quality assurance check on forms and the brochures that it has translated to ensure that the translation is accurate. OATH has traditionally used volunteers from the City's Language Bank or OATH employees to assist with the review process.

### **3. Use of Plain Language Guidelines and Standards**

OATH's goal is to use plain language as much as possible. Before translating a document into another language, OATH continues its practice- started in 2010- of rewriting the document using plain language principles. It is the plain language version of the documents that will become commonplace and will be used as the basis for translated versions.

All of OATH's judges and Hearing Officers are trained in plain language speaking and writing. Our hearings are conducted using plain language, where applicable and our hearing decisions are written in plain language. This ensures that the 300,000+ decisions that go out each year to people who had received summonses are easy to understand and do not use legalese. The Public Affairs & Communications office is also trained in plain language. This office is headed by the Deputy Commissioner for Public Affairs and Communications, who is also the Language Access Coordinator for the agency. This office is responsible for creating all forms, brochures, notices and informational materials that are consumed by the public.

### **4. Website**

The OATH website has a built-in translation function. The website is written in plain language so that much of the website translations are accurate. An added benefit is that many of OATH's electronic forms are not in PDF format, but rather are HTML webpage-based forms that are processed through the City's 311 electronic routing system. These types of forms that are webpage based can also be translated by pressing the "translate this page" button on the OATH website. Instructions to this effect are provided on pages containing these forms, stating the following:

*Please note that the online form can be translated by using the "Translate This Page" black button on the top of the page. You can submit this form in the language you feel most comfortable using.*

Additionally, OATH has added numerous announcements on various locations of its website that alert respondents that documents can be submitted in the language of their choice. For example, on the "Forms" section of the OATH Hearings Division website the page states the following:

#### ***Translation Services***

*If you feel more comfortable writing your responses on these forms in a language other than English, please do so. Your responses can be written on these forms in the language of your choice. The OATH Hearings Division will have all applications and forms translated into English, free of charge.*

OATH will continue to explore ways to make its website more accessible and user-

friendly.

#### **5. Signage at Public Hearings Centers**

OATH currently has 6 public locations across its divisions.

#### **6. Public Notices About OATH's Free Language Assistance Services**

OATH has already installed desk top signs at its reception and check-in window. These signs inform the public that OATH provides free interpretation services.

#### **7. Translation of Directional Signage in OATH Offices**

OATH has already translated signage into Spanish and will be doing a review of signage and the possibility of translating directional signs.

#### **8. Letting the Public Know about Services Offered for LEP Persons**

OATH will continue to let the public know about services offered for LEP persons in the following ways:

- The OATH Language Access Implementation Plan will be posted online.
- OATH has signs at its reception in-take desks that are written in sixteen different languages which state that OATH provides free interpretation services.
- OATH Clerks assist in finding out if someone is an LEP person, and then let them know that interpretation is available, and arranges for a hearing with an interpreter.
- Informational materials and brochures state that free translation services are available at OATH's divisions.
- The OATH websites have numerous references to the agency's free interpretation and references to its free document translation services for any forms that are submitted in foreign languages.

#### **9. Emergency Preparedness**

During an emergency, OATH posts notices about office closures and any automatic rescheduling of hearings on our website and on our IVR (1844-OATH-NYC). Our website is translatable so visitors to our site see the message. During an emergency, Clerks at Call Centers are sent approved messaging once it has been approved by Deputy Commissioner for Public Affairs & Communications and the Commissioner. The clerk's in our call centers always have the ability to get an interpreter on the line when a person calls that doesn't speak English.

Unfortunately, our over-the-phone interpretation vendor may experience high call volume if an entire area such as NYC is experiencing an emergency which can mean that the vendor may make our staff wait for an extended amounts of time before a translator is available to assist. In this instance, we would use staff who are fluent in other languages to communicate with callers but they are instructed to only use the pre-approved messaging. Each call center and branch office is aware of staff that are fluent in other languages and emergencies would be the only time when these staff are asked to use their language capabilities since it would be improper for us to act as interpreters during an interaction that involves providing language assistance with

a hearing or a case, but the information that would be relayed in these instances would be limited to information regarding office closings and/or hearings be automatically rescheduled.

## **VII. Training**

### **1. Training on OATH's Language Access Plan**

Training on OATH's Language Access Plan will include the following:

- OATH staff who have regular contact with LEP persons receive training on OATH's Language Access Plan. This staff includes OATH hearing officers, Administrative Law Judges and clerks. The training will be on-the-job training, training by Memo, online training or classroom training, as needed.
- Language Access Plan information will be incorporated into new employee orientation.
- Language Access Plan training will include information on the following topics:
  - OATH's legal obligation to provide language assistance.
  - A review of when OATH provides language assistance.
  - A review of their role in providing language assistance.
  - Tips on working with interpreters.
  - Who to contact at OATH if they have questions about language access issues.
- The Language Access Coordinator will meet with managers to explain the Language Access Plan and to explain their roles in implementing the plan and in training staff.

### **2. Training on Identifying a Person's Primary Language; Use of Dual Head-set Phones and Conference Phones for Interpretation**

Use of dual-handset phones and conference phones:

- Hearing officers and Administrative Law Judges and Clerks have received on-the-job training in using phone interpretation services and conference phones.
- This training occurs at orientation for employees at the Clerk's Office.
- This training occurs during a two week intensive "New Judge/Hearing Officer" training for new ALJS and Hearing Officers which takes place twice a year. This intensive in-person training is administered by [OATH's Administrative Judicial Institute \(AJI\)](#).
- Under this version of the Language Access Implementation Plan, new staff in these positions will continue to receive this training upon their arrival at OATH.

### **3. Cultural Competency Training**

Cultural competency training is training to increase awareness about and sensitivity to diversity and cultural differences.

- OATH's Administrative Judicial Training Institute (AJI) provides cultural competency training to hearing officers and Administrative Law Judges and customer service staff.

## **VIII. Record Keeping and Evaluation**

### **1. Ensuring Quality of Language Access Services**

OATH will ensure the quality of its language access services by doing the following:

- OATH will conduct periodic surveys of the LEP persons and of OATH staff who use OATH's interpretation and translation services to determine quality of language access services.
- OATH will continue to use professional third-party interpreters for its interpretation services at hearings and for clerk office interactions with LEP persons, and also for translation of documents.

### **2. Maintaining Records of the Language Services OATH Provides**

OATH will maintain records of the language services it provides by doing the following:

- Obtaining statistics from the interpretation provider that indicate how many interpretations were done at each OATH location and what languages were interpreted.
- Keeping file copies of all translated documents.
- Documenting any formal classroom training provided and keeping file copies of training materials.
- Keeping copies of the results of any surveys it conducts in connection with services provided to LEP persons.

### **3. Ensuring Compliance with Local Law 30**

OATH will ensure compliance with Local Law 30 in the following ways:

- Hearing Officers, ALJs and Clerks will be trained in the use of language assistance services.
- OATH will get monthly reports from the interpretation contractor, and from OATH staff, to ensure that interpretation services are being used, and understand how they are being used.
- The Language Access Coordinator will regularly communicate and work with OATH staff to ensure they are implementing the Language Access Plan.
- The OATH Language Access Coordinator will work with other OATH executive staff as needed, to continue deciding issues relevant to compliance- including deciding which newly created documents should be translated and in what order and into which languages.
- OATH will review the Language Access Plan at least once every year.

## **IX. Resource Analysis and Planning**

### **1. Using Current Agency Resources to Implement the Language Access Plan**

Some parts of the initial OATH Language Access Plan could be afforded in its budget as one-time costs, including:

- o Signage.
- o Purchase of dual-handset phones, conference phones, or equivalent technology.
- o Training of current clerks in the use of dual-handset phones and use of interpretation services.
- o Re-writing of document(s) into plain language



- o Translation of document(s) into LEP languages.
- o Preparation of a PowerPoint presentations for waiting room televisions.
- o Providing on-line translation capability for all website pages and online forms.

Other parts of OATH's Language Access Plan, such as interpretation at hearings, involve ongoing costs which OATH includes in its budget annually.

**1. Using Existing Contracts for Services or Training**

The current telephonic interpretation requirements contract will be used for interpretation services, data retrieval, and for collaborating with for staff trainings.

**2. Use of a Volunteer Language Bank**

OATH does not intend to use a volunteer language bank at this time due to the nature of the service (*impartial* administrative hearings) that OATH provides to the public. It will use the volunteer language bank to check document translations of important outreach materials when those translations are made by a third party vendor under contract with OATH.

**3. Use of Citywide Resources**

When possible, OATH will use citywide resources to help provide language access services at OATH. To learn about citywide resources (such as pre-printed language cards), OATH's Language Access Coordinator will be in contact with the Mayor's Office of Immigrant Affairs. That Office helps City agencies to get language services to the public and gives technical assistance to City agencies in providing language services.

**IX. Outreach and Public Awareness**

**1. Ethnic Media and Advertising**

OATH does not have a media, advertising or PSA budget. OATH does, however, engage ethnic media through its Public Relations activities. OATH partners with elected officials and civic organizations when it holds outreach events in the community. OATH relies on these groups and offices to advise as to the constituency they are trying to target with the event. Ethnic media receive press releases in the languages of the service population of the event. For example, when OATH is in Harlem or Inwood, the press release and event flyers that are disseminated would be in Spanish. When the event is in Flushing, Queens, the materials would be translated into Chinese. OATH also provides translation of its outreach events when requested by our partners or attendees in advance.

**2. Interpreters at Public Outreach Events**

As stated above, OATH conducts many dozens of outreach events each year in communities around the City or over video conference as was done in 2020 during the pandemic. When OATH does outreach for these events in foreign languages, it will have live interpreters present at the events that speak in the language that the flyers or website postings were translated into. This provides comprehensive, end to end interpretation for OATH outreach activities. OATH will continue to provide translators at public events with diverse populations and have our promotional

materials for those events translated into the targeted languages so that residents feel welcomed to join us at our events and can get as much out of the events as those who come who are native English speakers.

## **X. Language Access Complaints**

### **1. Process for LEPs to File Complaints Related to Language Access Services**

OATH has signage in its hearing centers that tells respondents that they have the right to complain about the interpretation services provided by OATH. They are instructed to call 311 with their complaint or they can visit the OATH website and file a complaint online. The complaint would be routed to the Deputy Commissioner for Public Affairs, who is also the agency's Language Access Coordinator. She would send the complaint to document translation vendor if the complaint was in another language. She would investigate the complaint and then answer the correspondence directing it to the complainant after investigating the complaint. If the original complaint was in another language, she would have the response translated by our vendor before sending the translated response to the complainant.

### **2. How Complaints are Handled by OATH for Service Disruption by Vendor and Quality Assurance**

OATH submits complaints to vendors if we encounter quality control problems and we respectfully request plans of action from them if the problem is persistent. In regards to over the phone translation, OATH has a secondary contract that can be used when the problem is not solved to our satisfaction by our primary vendor. There is a protocol for using the second vendor, including documenting instances and making formal complaints with the primary service provider and giving them the opportunity to resolve the issue.

In terms of quality assurance for document translation, OATH has translated documents reviewed by employees who are fluent in the languages we are getting forms or outreach materials translated into. We also use City Volunteer Language Bank to review document translations for accuracy.

## **XI. Implementation Plan**

### **1. Persons at OATH Involved in Implementing the Language Access Plan**

OATH's Language Access Coordinator is Marisa Senigo, Deputy Commissioner for Public Affairs & Communications. She is the person who will be implementing the Language Access Plan.

The responsibilities of the Language Access Coordinator include:

- Achieve the specific goals of the Initial and subsequent LAPs.
- Work on an ongoing basis with the senior staff at OATH's divisions to achieve those goals and ensure that the public has access to translated materials and interpretation services.
- Submit an "Annual Report" on the agency's language access efforts and

accomplishments to the Mayor's Office of Operations (MOO) and the Mayor's Office of Immigrant Affairs (MOIA).

- Act as the point person for the Mayor's Office on language access evaluation programs, such as Language Access Secret Shopper (LASS) evaluations.
- Act as the point person for the public, for LEP persons and for people with disabilities.
- Work with the Director of the Administrative Judicial Institute (AJI) at OATH, and also with other OATH executive staff as needed, in connection to the training of Hearing Officers and judges in order to achieve the goals of the Language Access Plan.
- Maintain records of the language services provided by OATH including maintaining copies of all translated document submissions, brochures, applications and forms.
- Conduct an annual review of the Language Access Plan.
- Investigate and respond to any direct correspondence or correspondence to 311 in which a constituent files a complaint about OATH's language accessibility or interpretation services.
- Alert the General Counsel's office, and also other OATH executive staff as needed, of any significant problems that arise regarding the Language Access Plan.
- Ensure that communications (event flyers, press releases, etc.) are available and disseminated in applicable languages according to service area.

## **2. Goals for Next Reporting Period**

**Website:** all forms are translated into ten (10) languages and available on our website. Currently, the name of the language is a link to the document; however, the document's title/name is not translated into that language. So, for example, there is an Appeal Application that is translated and the link to it just says "ESPAÑOL" rather than "SOLICITUD DE APELACIÓN". In 2021, OATH plans to translate all essential documents, documents of key importance, and informational or educational documents' titles into the top ten (10) Local Law 30 languages. OATH will also continue to explore other ways to make its website more accessible and user-friendly.

**Informational notices:** OATH will start using boiler plate language in the top ten (10) LL30 languages about where to go for more information in instances where notices are not available in the top ten languages.

**Assessing and Evaluating Our Services and Progress:** Over the next reporting cycle, OATH will conduct periodic surveys of LEP visitors to its hearings centers

and of OATH staff who use OATH's interpretation and translation services to determine quality of language access services provided by the court. OATH will also solicit ideas for how we can make our language services better and more comprehensive.

Language Access Goal	Milestones	Responsible Staff	Deadline
<p><b>Website:</b> Translate all titles of essential documents that are already translated into top ten (10) languages so that the user can read the title of the document in their preferred language.</p>	<p>Gather essential documents and submit to vendor for translation of title and place translated titles on website to link to the translated version of the document in that language.</p>	<p>Marisa Senigo, Deputy Commissioner for Public Affairs &amp; Communications</p>	<p>January 15, 2022</p>
<p><b>Informational notices:</b> OATH will start using boiler plate language in the top ten (10) LL30 languages about where to go for more information in instances where notices are not available in the top ten languages.</p>	<p>Ongoing</p>	<p>Marisa Senigo, Deputy Commissioner for Public Affairs &amp; Communications</p>	<p>Ongoing as new notices are developed</p>
<p><b>Assessing and Evaluating Our Services and Progress:</b> Over the next reporting cycle, OATH will conduct periodic surveys of LEP visitors to its hearings centers and of OATH staff who use OATH's interpretation and translation services to determine quality of language access services provided by the court.</p>	<ol style="list-style-type: none"> <li>1. Create Survey</li> <li>2. Distribute Survey to Office Locations</li> <li>3. Collect Survey Responses for 3 months</li> <li>4. Compile Results</li> <li>5. Issue Report and Recommendations</li> </ol>	<p>Marisa Senigo, Deputy Commissioner for Public Affairs &amp; Communications</p>	<p>January 2022</p> <p>February 15, 2022</p> <p>June 1, 2022</p> <p>July 15, 2022</p> <p>October 15, 2022</p>

Review Language Access Implementation Plan	Annually	Marisa Senigo, Deputy Commissioner for Public Affairs & Communications	February 1, 2022, 2023, 2024
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**Contact OATH's Language Access Coordinator:**

Marisa L. Senigo  
Deputy Commissioner for Public Affairs & Communications  
[msenigo@oath.nyc.gov](mailto:msenigo@oath.nyc.gov)  
(212) 933-3080



**NYC**  
Office of Chief  
Medical Examiner

# **New York City**

## **Office of Chief Medical Examiner**

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Language Access Policy and Implementation Plan

November 2021

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**New York City Office of Chief Medical Examiner**  
**Language Access Implementation Plan**

**Language Access Coordinator**

In 2019, the New York City Office of Chief Medical Examiner (OCME) designated its General Counsel, Florence Hutner, as its Language Access Coordinator for offices serving families in all five boroughs. The Language Access Coordinator serves as the primary point of contact for implementing Local Law 30 and Executive Order 120, as well as similar Federal and City mandates. In this role, the Language Access Coordinator works to:

- Increase the visibility of interpreter services to LEP clients.
- Enhance support for staff utilizing these services.
- Manage document translations by approving which documents are sent for translation and determining languages into which documents should be translated.
- Ensure availability to staff of translated forms and booklets by managing the posting of such material on OCME's intranet.
- Collaborate with others to address any cultural and linguistic barriers relevant to OCME's service areas

OCME's Language Access Policy and Implementation Plan (LAIP) can be found online here: <https://www1.nyc.gov/site/ocme/about/language-access.page>.

**I. Agency Mission and Language Access Policy Background**

***OCME Mission***

OCME investigates cases of persons who die within the City of New York from criminal violence; by accident or by suicide; suddenly, when in apparent health; when unattended by a physician; in a correctional facility; or in any suspicious or unusual manner. The Office also reviews applications made pursuant to law for a permit to cremate the body of a person.

OCME provides the following direct public services in the five boroughs through interaction between OCME staff members and members of the public:

- Investigation of reportable deaths
- Identification of decedents, in which family members may come to any one of OCME's five Family Service Centers to view a photograph of their loved one to make the identification
- Discussion of relevant cases between family members and the assigned Medical Examiner, most commonly by telephone but by in-person appointment if requested
- Records requests, such as autopsy reports
- Various family services, including the World Trade Center Hotline and Missing Persons Day

***Executive Order 120 and Local Law 30***

In July 2008, Mayor Michael Bloomberg signed Executive Order 120, creating a centralized



language access policy for New York City. Executive Order 120 mandates that all City agencies that provide direct public services create a language access implementation plan in order to ensure meaningful language access to their services. In July of 2017, Local Law 30 went into effect, expanding language access at City agencies. Local Law 30 amended the New York City Charter and Administrative Code to require all covered City agencies provide language access services in ten designated citywide languages<sup>1</sup>.

**II. Agency Language Access Policy and Goals**

OCME created this Language Access Policy and Implementation Plan in 2021 in compliance with Executive Order 120 and continues to comply with Local Law 30. The policy of OCME is that limited English proficiency shall not be a barrier to receiving effective services. This Plan affirms OCME’s commitment to providing meaningful access for all citizens of New York and other locations, including individuals with limited English proficiency who need the agency’s services.

Ensuring timely access to services through language assistance measures is essential for OCME staff members to interact effectively with families and reach the most appropriate outcomes. This Plan outlines how OCME seeks to ensure that individuals in need of OCME’s services receive them, and to avoid the possibility that a person who requires access to services is denied such services based on the language he or she speaks.

**III. Agency Language Access Accomplishments and Progress on Goals from Previous LAIP**

<b>Goal</b>	<b>Update</b>
Train all current and new employees on how to provide assistance to limited English proficient (LEP) individuals in their preferred language.	In March of 2020, the OCME restructured its agency and redeployed over half of its employees to assist with Mortuary operations and other critical assignments, in response to the COVID-19 pandemic in New York City. Having recently resumed more normal operations, the OCME will now focus on accomplishing this goal by September of 2022. Current employees are regularly reminded of the agency’s Language Assistance policies and procedures.
Update OCME’s public website so that information is available in all 10 designated citywide languages for LEP individuals.	In June of 2020, the OCME worked with the Mayor’s Office of Immigrant Affairs (“MOIA”) to update the OCME’s public website so that the home page contains links in all 10 designated citywide languages. The link then takes the user to a page, which contains important useful information, such as what the OCME is responsible for as related to investigating deaths and conducting autopsies, contact information, locations of

<sup>1</sup> OCME provides language access services in the following languages: Spanish, Chinese, Russian, Korean, Haitian-Creole, Arabic, French, Polish, Italian, and Hindi.

	Family Service Centers, and frequently asked questions about autopsies, requesting records, etc..
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**IV. LEP Population Assessment**

OCME uses the Department of Justice’s Four-Factor Analysis as a guide to evaluate the LEP populations served by the agency. This approach provides a balanced assessment of OCME’s current language assistance needs while allowing flexibility to adjust language assistance measures in response to monitoring and measuring. OCME reviewed monthly invoices from Language Line to determine which languages were most frequently requested by LEP individuals. The most frequently requested languages at OCME are Spanish, Chinese, Russian, Portuguese, Korean, Haitian-Creole, Arabic, French, Polish, Italian, and Hindi. Vital forms, such as the Identification Form and Autopsy Objection Form, along with the “Information for Family and Friends” brochure, were translated into those ten languages to better assist LEP individuals seeking OCME’s assistance. In keeping with Local Law 30 of 2017, OCME has translated these documents into all 10 designated Citywide languages.

**Factor 1: Demographic Analysis**

OCME’s eligible service population is defined as New York City, broken down by county to correspond with the agency’s service for families in each of the five boroughs. According to data obtained from the U.S. Census Bureau’s 2018 American Community Survey 1-Year Estimates, the total population of New York City is 8.4 million, and of that population, 21.4% (1.8 million) persons are Limited English Proficient (LEP).

Data provided by the New York City Department of City Planning, based on the 2018 American Community Survey, shows that the top six languages spoken by the 1.8 million LEP persons in New York City are Spanish (48.5%), Chinese<sup>2</sup> (18.9%), Russian (6.3%), Bengali (3.5%), Haitian (2.1%), and Korean (1.9%).

In Manhattan (New York County), 13.6% (221,563) of the total population of 1.6 million is LEP. Among the LEP population in Manhattan, the most frequent<sup>3</sup> languages spoken are Spanish (58.5%), and Chinese (23.4%).

In Brooklyn (Kings County), 20% (511,211) of the total population of 2.6 million is LEP. Among the LEP population in Brooklyn, the most frequent languages spoken are Spanish (31.2%), Chinese (23%), Russian (16.2%), Yiddish (5.7%), and Haitian-Creole (4.3%).

In Queens (Queens County), 27.8% (627,587) of the total population of 2.3 million is LEP. Among the LEP population in Queens, the most frequent languages spoken are Spanish (41.6%), Chinese (23.5%), Bengali (6.5%), and Korean (4.2%).

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<sup>2</sup> Includes Chinese, Cantonese, and Mandarin.

<sup>3</sup> Languages spoken more than 5% of the time.

In the Bronx (Bronx County), 24.9% (349,034) of the total population of 1.4 million is LEP. Among the LEP population in the Bronx, the most frequent language spoken is Spanish (83%).

In Staten Island (Richmond County) 10.9% (52,107) of the total population of 476,143 is LEP. Among the LEP population in Staten Island, the most frequent languages spoken is Spanish (28.6%) and Chinese (23.5%).

### **Factor 2: LEP Data Tailored Specifically to OCME**

OCME instituted Language Line in 2007 to provide telephonic interpretation and translation services in more than 170 languages. Language Line usage is tracked by reviewing monthly invoices to measure the frequency of languages encountered by OCME, in order to make adjustments to Language Access services as necessary, and to inform future planning.

From January to August 2021, 1,414 calls were made to Language Line in order to provide families served by OCME with Language Access assistance. In a close reflection of the Citywide demographic analysis, Spanish, Chinese and Russian represented the vast majority of languages encountered, at 91%. Spanish accounted for 76% of calls, Chinese accounted for 8% of calls, and Russian accounted for 4% of calls.

A total of 49 languages were encountered from 2016 through the third quarter of 2021. In addition to Spanish and Chinese, top languages in 2021 included Portuguese at 1.5%, French at 1%, and Korean at 1%.

Use of Language Line increased by 66% between 2019 and 2020, from 1,519 calls to 3,375 calls. With 1,414 calls in the third quarter of 2021, use of Language Line is anticipated to increase again by the end of 2021.

### **Factor 3: Nature and Importance of the Services Requiring Language Assistance Measures**

The services requiring language assistance are essential to the mission of OCME. These services include the Communications Unit's intake of calls reporting deaths that potentially within OCME jurisdiction; interactions between medico-legal investigators and individuals including next of kin at the scene of a death; the identification process and subsequent interaction with next of kin, including arranging for final disposition of a decedent; discussion of death investigations between family members and the assigned medical examiners; and requests for important records, such as autopsy reports or suicide notes. Denial or delay in these essential services can pose negative consequences for family members, as well as the criminal justice and public health systems served by OCME.

### **Factor 4: Resources Designated for Language Assistance Services**

#### **Language Line**

Language Line provides interpretation and translation services in more than 170 languages. The resource is available to OCME staff members whose work involves interactions with the families and other members of the public served by the agency.

### **Volunteer Language Bank**

OCME created and maintains a Volunteer Language Bank to centralize awareness of the availability of bilingual staff members who can offer oral interpretation in each of the agency's service areas. The language bank currently has 30 staff members representing 16 languages.

### **Evaluation of Language Access Needs of Agency's Service Population**

Based on OCME's assessment of the above four factors, access to translation services is critical in communicating with LEP individuals who request services from OCME. OCME frequently engages with a large number of LEP individuals on a daily basis. OCME often encounters LEP individuals when conducting outreach and in assisting family members inquiring about a decedent. OCME is responsible for addressing questions, concerns, and providing updates to these individuals. OCME uses telephonic interpretation services, bilingual staff when available, and materials translated in all 10 designated Citywide languages. OCME has also translated materials beyond the required 10 designated Citywide languages based on its review of the most requested languages for translation.

## **V. Provision of Language Access Services**

### **Interpretation Services**

Interpretation services are currently only available over the phone. Pre-pandemic, interpretation services were offered in person at OCME service centers in each of the five boroughs. Telephone interpretation service is available in more than 170 languages through OCME's participation in the Department of Information Technology and Telecommunications' citywide contract with Language Line. When in-person visits from the public resume, in-person interpretation will be available in 16 languages through OCME's bilingual staff who have registered with the Volunteer Language Bank. The primary languages of LEP persons are identified through a Language ID card used by staff members at all OCME service centers. Both telephone and in-person interpretation services are available in Spanish, Chinese, and Russian, the primary languages of the vast majority of LEP persons served by OCME. These in-house volunteer translators also provide assistance with translating evidence such as suicide notes and speaking with family members on a day-to-day basis.

### **Translation Services**

OCME identifies vital forms as official documents that require signature, and brochures that explain key practices and policies of the agency. These vital forms were previously translated into the languages most frequently encountered by OCME. The top ten most requested languages at OCME are Spanish, Chinese, Russian, Korean, Haitian Creole, Arabic, French, Polish, Italian, and Hindi. OCME has translated additional vital forms, such as the Scene Identification Form and Autopsy Objection Form, in Bengali and Urdu in order to ensure that vital documents have been translated into the top ten designated citywide languages.

Other official documents that have been translated include the Identification Form, Organ Retention Form, and Autopsy Objection Form signed by families, and the Pending Death Certificate signed by medical examiners. Brochures that have been translated include "General Information" and "Information for Family and Friends." Translations are provided through Language Line and the Geneva Worldwide vendor, which certifies its work for accuracy and

authenticity. All translations are made using the "Easy-to-Read NYC: Guidelines for Clear and Effective Communication" developed by the Mayor's Office of Immigrant Affairs. The materials were reviewed to ensure that they are written in plain language.

OCME has also provided language assistance through its website since February 2009. Translations of the website are available in more than 30 languages through the "Translate This Page" link at the top of each web page. On OCME's main homepage, there are multilingual links to OCME's FAQ page, which has been human translated to all ten designated Citywide languages.

### **Emergency Preparedness and Response**

In the event that there is an emergency resulting in a mass fatality, OCME is prepared to assist LEP individuals seeking information through the use of volunteer employee translators and Language Line.

## **VI. Training**

All staff members whose work involves regular contact with the public receive Language Access training. Frontline employees who interact with LEP persons include Medical Examiners, Medico-Legal Investigators, Security, and staff members of the Identifications and Communications Units. Training is provided at the start of employment and thereafter as needed.

Training for frontline employees encompasses the content of OCME's Language Access Policy, a review of the "Guidelines and Procedures for Using Language Line," viewing of the Language Line training video (available on the Language Line website), methods for implementing interpretation and translation services (e.g. identifying a customer's primary language, reporting requests for language services, the use of telephonic interpreters, and placing translation requests), as well as notes on cultural competency. During these training sessions, "Interpretation Services Available" wall posters, language ID cards, 311 complaint posters, and Language Line quick reference guides are distributed. These materials are also made available to employees for downloading at any time on OCME's Intranet and are distributed to current employees when updated.

## **VII. Record Keeping and Evaluation**

OCME tracks Language Line usage by monitoring the charges detailed on the service's monthly invoices to OCME. This data provides insight into which languages are being requested at each of the five service centers and enables OCME to identify additional languages into which forms should be translated, and areas within the agency where additional training may be necessary.

In early 2015, OCME established an e-mail address, [311mail@ocme.nyc.gov](mailto:311mail@ocme.nyc.gov), where the Mayor's Office can forward any 311 complaints related to the agency's Language Access services.

To ensure compliance with Executive Order 120 and Local Law 30, OCME will continue to review its Language Access Policy and Implementation Plan at least every three years for the following:

- Changes in the LEP population or in the service areas.
- Changes in the frequency of encounters with LEP language groups.
- Changes in resources, including new technologies, additional resources, and budget availability.
- Effectiveness of existing language assistance to LEP individuals.
- Staff knowledge of OCME's Language Access Policy and its implementation.
- Whether identified sources for assistance are still available.
- Changed language abilities available among staff.
- Revision of the Language Access Policy, as necessary.

### **VIII. Resource Analysis and Planning**

OCME conducts a periodic review of the most frequently requested languages to ensure that adequate language services are provided to LEP individuals. OCME monitors which languages are requested and how frequently the languages are requested by employees using language line. This enables OCME to determine if there are changes in language requests across the city. OCME also relies on the U.S. Census American Community Survey Summary File of Top Languages Spoken at Home in New York City and Boroughs to track language trends. This information allows OCME to determine whether documents need to be translated in specific languages or if additional resources are required for a specific LEP population. OCME also has access to City resources, which provide additional language interpretation services. Currently, OCME utilizes telephonic interpretation.

### **IX. Outreach and Public Awareness of Language Access Services**

OCME's mission and the nature of services provided do not warrant conducting public awareness outreach. For those citizens of New York and other locations who need to avail themselves of OCME's services, the agency's policy is to ensure that limited English proficiency is not a barrier to receiving meaningful and effective services. To inform those members of the public about its Language Access policy and services, OCME posts signage in family waiting areas to advise clients of Language Access services such as the availability of free interpretation and translation. In addition, OCME makes its two brochures, "General Information" and "Information for Family and Friends" available on its website in the languages most frequently encountered by the agency. OCME's FAQ page is also translated into all ten designated Citywide languages. The Language Access Policy and Implementation Plan is posted on the website, and the website also includes a "Translate This Page" button to make online material available in over 30 languages.

While OCME does not frequently host events for the public, the agency incorporates Language Access resources into such events when applicable. In November of 2014, OCME hosted the first ever NYC Missing Persons Day and provided in-person translators for Spanish-speaking families at the event. Promotion was also conducted for the event in Spanish, with a logo designed in Spanish and significant outreach to Spanish language media.

In May of 2019, OCME hosted Missing Persons Day and again provided similar language access services. The Missing Persons Day flier was translated in over 10 languages to promote the event to LEP individuals. The event took place in the OCME Family Assistance Center,

where the Family Assistance Team met with families and individuals. This team consisted of OCME employees who were able to conduct interviews and provide in-person translation in six different languages. The employees also had access to Language Line in the event an employee could not provide translation services. A DNA collection form that was provided to families was available in both English and Spanish. In the past, the event has had a large population of Spanish-speaking families in attendance. In 2019, approximately 20 out of 30 families seeking assistance were Spanish-speaking. In addition, OCME is able to prepare for a mass fatality event using its experience during Missing Persons Day by utilizing the same team of employees to meet with families, collect DNA, and provide language access services as it would in an emergency. The OCME did not host Missing Persons Day in 2020, or any other onsite events, due to the COVID-19 pandemic.

## **X. Language Access Complaints**

OCME is committed to ensuring that LEP individuals have access to the same resources as English proficient individuals. OCME seeks to ensure that any complaints made about its language access services are handled in a proactive and efficient manner. Members of the public can submit complaints or requests for language access services from OCME by calling or emailing 311. OCME receives email notification of any filed 311 complaints or requests from the Mayor's Office. This 311-email inbox is monitored by OCME's Director of Public Affairs. If a complaint or request for language access services was filed through 311, the Director of Public Affairs would notify OCME's Language Access Coordinator. The complaint or request would then be handled accordingly.

Between 2016-2021, OCME received 0 complaints or requests for language access services.

## **XI. Implementation Plan Logistics**

### **Goals**

OCME now has one prospective goal in relation to Language Access. OCME will train all new employees and will train new employees on how to provide assistance to LEP individuals in their preferred language. OCME hopes to accomplish this goal by 2022.

### **Language Access Milestones**

Through the years, OCME has made significant progress in its ongoing effort to ensure meaningful access to services for individuals with limited English proficiency and is committed to maintaining its high standards of achievement and effectiveness in this area. OCME has:

- Long utilized the skills of bilingual staff to provide timely interpretation and translation services.
- Since the 1990s, provided Spanish language translations of the "Information for Family and Friends" brochure, which offers essential information about OCME tailored to those who have lost a lost one.
- Since May 2007, supplemented bilingual staff with Language Line's translation and interpretation services for additional language assistance support in over 170 languages.

- Since June 2008, offered vital forms used by families, such as the Identification Form, Autopsy Objection Form, and others, have been translated into all 10 designated Citywide languages.
- Since June 2008, offered the revised “Information for Family and Friends” brochure and the “General Information” brochure in Spanish, Chinese, and Russian. The brochures were subsequently translated into all 10 designated Citywide languages.
- Created and continually updated a Volunteer Language Bank to centralize awareness of the bilingual skills of OCME staff members and their availability to assist individuals with limited English proficiency seeking access to OCME services. The language bank contains 30 employees, representing approximately 5% of OCME’s workforce, proficient in 16 languages.
- In May of 2019, OCME hosted the New York City Missing Persons Day event for the third year. OCME provided live translation services, which consisted of volunteer OCME employees that were fluent in French, Spanish, Hindi, Gujarati, Russian, and Mandarin. The interview specialists and family escorts also had access to language line. Through these translation services, OCME was able to provide support for families seeking to identify and locating missing family members.
- In March of 2020, OCME translated its Scene ID form and Autopsy Objection form, both official vital documents, into all ten designated Citywide languages.
- In June of 2020, OCME updated its website and translated its FAQ page into all ten designated Citywide languages.



# Language Access Implementation Plan



**Commissioner Jessica Tisch**

**Updated: 06-25-2021**

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## I. Language Access Coordinators

The Language Access Coordinator for the Department of Information Technology & Telecommunications (DoITT) is Elsa Hampton, who serves as the agency's Chief Equal Employment Opportunity (EEO) Officer. DoITT's Language Access Implementation Plan (LAIP) can be found on our website [here](#).

DoITT manages both the operations and technology for New York City's 311 Customer Service Center, which is our primary means of interacting with the public. Given the central role that 311 plays in providing government information and services to the public, 311 also has its own Language Access Coordinator, Michael Hutchinson, whose title is Contracts and Finance Director. This information is accessible on the 311 website [here](#).

## II. Mission and background

### DoITT Connects NYC

DoITT primarily serves City agencies by maintaining the core technology infrastructure and platforms that power many City systems. DoITT also helps agencies build the vital programs that are central to their work of delivering services to New Yorkers. Whether it's public safety, human services, or economic development, DoITT's goal is always the same: to make New Yorkers' lives better by leveraging technology to connect them to the government services on which they rely every day. The 311 Customer Service Center and the NYC.gov platform, the City of New York's official website, are the primary channels through which DoITT interacts with the public.

The 311 Customer Service Center first became operational in March 2003. Its mission is to provide the public with quick, easy access to all New York City government services and information. The 311 Customer Service Center supports over 100 City agencies, offices, and other government entities and is the primary vehicle used by residents, businesses, and visitors throughout the five boroughs to obtain non-emergency government services and information.

By dialing one, easy-to-remember telephone number, a caller can obtain information from a knowledge base of over 2,000 articles, which provide pertinent details on government services and information.

Calls to 311 are answered 24 hours a day, 7 days a week, 365 days a year. Services include providing information, processing service requests for various City agencies, taking complaints from callers about City services, and making referrals to certain city, state, and federal government agencies.

The City agencies for which 311 takes service requests include, but are not limited to: Department of Buildings; Department of Education; Department of Environmental Protection; Department of Health and Mental Hygiene; Department of Housing Preservation and Development; Department of Parks and Recreation; Department of Sanitation; Department of Transportation; Police Department (Quality of Life); and the Taxi and Limousine Commission.

DoITT and 311 work closely to help agencies improve service delivery by allowing them to focus on their core business and manage their workload efficiently. DoITT also provides insight into ways to improve through accurate and consistent measurement and analysis of citywide service delivery. 311 maintains liaisons with City agencies to develop and maintain updated content specific to the agencies' service offerings. This information is shared with callers seeking detailed information about the services provided by those agencies.

In 2018, the Department of Citywide Administrative Services (DCAS) renewed their contract with Language Line Solutions (Language Line) for telephone interpretation and language translation services. 311 currently uses Language Line for both of these services. The DCAS contract was designed to permit all City agencies to establish a Task Order under their Primary Agreement. This eliminates the need for other agencies to undertake a Request for Proposal (RFP) process for language interpretation and translation services, and agencies benefit from the economies of scale available under a citywide Primary Agreement.

DoITT also hosts and maintains the NYC.gov platform, providing technical support for approximately 200 separate public websites for City initiatives, agencies, and offices that, in turn, are responsible for managing their own site content. In 2015, DoITT implemented the Google Translate widget across NYC.gov. Google Translate enables all agencies to provide dynamic, real-time translation of web pages into more than 100 languages.

### **III. Language access policy and goals**

DoITT has demonstrated its long-standing commitment to making government information and services more accessible to all New Yorkers through both its 311 Customer Service Center and its citywide public-facing websites, including the City's official web platform, NYC.gov, and other, more recently developed web-based applications. DoITT is also committed to working closely with elected officials, community partners, and members of the public to improve service delivery for individuals with limited English proficiency (LEP) and to enhance the overall customer experience for all New Yorkers.

311 began providing telephonic interpretation and translation services prior to Executive Order 120 issued in 2008 and Local Law 30 passed in 2017. All services provided by 311 are available to LEP individuals, regardless of the language spoken. 311 routinely informs customers of the availability of interpretation services with an upfront Interactive Voice Response (IVR) message. Providing non-English callers with the option to speak in their native language or the

language they are most comfortable speaking, encourages them to contact 311 for assistance obtaining government services or information.

311 has included service level agreements on the time it takes to connect to an interpreter in their contract with the language services provider. Reducing the time it takes customers to connect to an interpreter is a goal of 311 because it improves the overall customer experience. 311 also piloted and will continue to perform customer satisfaction surveys in languages other than English to help gauge the experience of its LEP customers.

Furthermore, DoITT implemented the Google Translation widget across the updated NYC.gov platform in 2015. DoITT maintains, manages, and supports, the standard template for NYC.gov, which provides City agencies with a web-based, language translation solution that is hard-coded into the template, prominently displayed, and easy for visitors to use. DoITT also provides meaningful language access by overseeing the technical review and implementation of alternate solutions that utilize manual and machine-based translations.

Finally, as the City's technology leader, DoITT has been positioned to develop innovative and vital web-based solutions to connect New Yorkers with necessary government services, especially important during a time when many offices were effectively closed to the public. Some examples over the past year include the technology that underlies: GetFood, Contact Tracing, Personal Protective Equipment (PPE) donations, Vaccine Finder, and VAX4NYC. These programs were built from the ground up with the goal of serving all New Yorkers by prioritizing language translation.

## **IV. Language Access Implementation Plan accomplishments and progress on goals**

### **311**

311 is currently mandated to answer 80% of all calls within 30 seconds. It is the goal of 311 to ensure that the average time to have a telephonic interpreter in the four most-commonly-requested languages of Spanish, Cantonese, Mandarin, and Russian, is also 30 seconds or less. Additionally, 311 provides access to health and human services in over 175 languages via its 211 dialing protocol. In April 2008, 311 introduced a multi-lingual IVR system interface, which was upgraded in 2018 to enhance non-English functionality. This enhancement included a direct dialogue feature to the Spanish call flow that enables customers to speak in Spanish via the IVR. All callers that select the language options via the IVR are informed in their language that a representative will bring an interpreter on the line for assistance. During 2020, over 1,068,000 callers selected the option offered by the IVR indicating their interest in being serviced in the language of their choice.

In 2019, additional functionality was integrated to further assist customers requiring interpretation services. Call Center Representatives (CCRs) are now informed of the customers' preferred language via a screen prompt as soon as the call is

answered. This improves the customer experience as an interpreter can be quickly engaged in the preferred language without the need for language triage. This service provides customers who speak Spanish, Mandarin, Russian, Cantonese, Korean, and Haitian Creole the option of listening to current 311 pre-recorded announcements such as “alternate side of the street parking” and COVID-19 information in their native language. This both shortens the wait time for customers seeking this information and eliminates the need for an agent or an interpreter to answer the call. After the recording, customers still have the option of requesting assistance in any of the over 175 other languages available via Language Line, including those designated under Local Law 30, which are Arabic, Bengali, Chinese – Simplified and Traditional, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu.

In 2020, 311 piloted its first online customer satisfaction survey in languages other than English. This survey was available in all ten languages identified under Local Law 30. Additional surveys in these languages will be conducted throughout the year to assess LEP customer satisfaction with various services provided by 311.

During the COVID-19 pandemic, 311 added surge-call takers through its contracted vendors. 311 directed the vendors to prioritize staffing bi-lingual (English and Spanish) agents across all shifts. 311 also directed vendors to utilize Language Line for non-English language calls as necessary.

Goal	Update
Multi-lingual IVR Enhancement	Natural Language Understanding (NLU) - direct dialogue enabled in Spanish
	Enabled option via screen pop to identify customers' preferred spoken language to call takers when calls are answered
Surveys	Developed and piloted online surveys in LL30 languages

**NYC.gov**

NYC.gov, the City's official website, is the virtual home of almost all NYC agencies, and serves over 300,000 visitors a day, delivering important government information and critical services to New Yorkers. During the COVID-19 pandemic, when many of the City's physical offices were closed to the public, NYC.gov assumed an even greater role. New sites and pages were quickly rolled out, already hard-coded to be digitally accessible, mobile-responsive, secure, and language-translatable. It helped New Yorkers find food assistance, employment assistance, PPE, testing sites, and updates about the status of schools, businesses, and houses of worship. NYC.gov played a vital role in helping to keep all New Yorkers informed, safe, and connected. NYC.gov utilizes the Google Translate widget that allows any content to be translated into more than 100 different languages.

## **GetFood**

New York City was hit extremely hard by the COVID-19 pandemic, and this unprecedented public health crisis was made worse by increased food insecurity for some of the City's most vulnerable residents. DoITT developed an application that connected elderly, sick, and homebound New Yorkers with the City's emergency food distribution program. The same application was used to engage thousands of idle TLC-licensed drivers to help with the deliveries. The accessible technology was built to be translated into 12 languages other than English to assist New Yorkers most in need with obtaining meals. Those languages are Spanish, Chinese, Russian, Bengali, Arabic, Korean, Polish, Italian, French, Urdu, Yiddish, Haitian Creole. At its peak, the program delivered one million meals a day.

## **NYC's Vaccine Finder**

DoITT built the [nyc.gov/vaccinefinder](https://nyc.gov/vaccinefinder), an interactive site that has become a one-stop shop where eligible New Yorkers can find the closest vaccine provider. The website utilizes the Google Translation widget to make real-time information available in over 100 languages regarding the availability of appointments for hundreds of vaccine sites citywide, including city, state, and private-provider locations. The Vaccine Finder also provides location-specific information about which vaccine is being distributed, what restrictions apply, and even offers directions.

## **VAX4NYC**

DoITT also built the platform that manages the scheduling of vaccination appointments for hundreds of vaccination clinics citywide. The public-facing site has been human translated into 10 languages for accessibility, including Arabic, Bengali, Chinese – Simplified and Traditional, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu.

The system also manages every aspect of a patient's vaccination from the time they create an initial appointment through to completion of their second dose. The system powers the operations at the vaccination sites, including patient check-in, screening, sending a record of the vaccination to the City's Immunization Registry, and scheduling of second dose appointments.

To prevent New Yorkers who may lack an internet connection from being disadvantaged in the appointment scheduling process, DoITT set up a vaccine-scheduling call center, where agents can schedule vaccine appointments at all sites that the VAX4NYC platform serves. This call center has both English and Spanish speaking call takers and utilizes Language Line to assist callers in over 175 different languages. Additionally, the IVR recording that callers hear when they dial the call center includes prompts for English, Spanish, Russian, Mandarin, Cantonese, Korean, and Haitian Creole.

## V. Limited English Proficiency population assessment

### Factor 1: Demographic analysis

The City of New York has a diverse population of over 8.5 million people. Executive Order 120 and Local Law 30 require agencies providing direct and emergency public services to provide services in 10 languages. These languages were identified by the Mayor's Office of Immigrant Affairs (MOIA) based on an assessment of the US Census data from the Department of Education. The languages are Spanish, Russian, Mandarin, Cantonese, Bengali, Haitian Creole, Korean, Arabic, French, Urdu, and Polish. 311 has provided telephonic and translation services since 2003 as required, in over 175 languages, including the ten mandated languages. 311 routinely monitors the frequency of use of these languages.

During 2020, 311 received 23,669,428 calls. Callers required telephonic interpretation assistance in 99 languages. The top ten languages/dialects requiring interpretation assistance by the calling public were Spanish, Mandarin, Russian, Cantonese, Korean, Haitian Creole, Bengali, Polish, Arabic, and French. These languages represented approximately 99% of the telephonic interpretation service minutes provided by Language Line in 2020.

### Factor 2: The frequency of contact with Limited English Proficiency individuals

#### 311

In 2020, 311 received 23,669,428 calls, of which 799,955 required interpretation services. Language Line provided assistance on 354,000 of those calls in 99 different languages, including Spanish, which accounted for just over 242,000 calls. Compared to calendar year 2017, there has been an increase of 160,705 calls where Language Line services were used. Additionally, 311 employs Spanish-speaking Call Center Representatives who handled another 446,000 calls in Spanish without the need for a Language Line interpreter.

311 obtains information from other agencies that assist in determining specific language requirements for targeted outreach programs. Over 94% of LEP callers to 311 request interpretation services in Spanish, Mandarin, Russian and Cantonese. The remaining 6% request interpretation in other languages. All LEP individuals, regardless of language, are eligible for telephonic interpretation services. During a call with an LEP individual where interpretation services are engaged and the call is an emergency that requires a transfer to 911, the 311 agent will immediately conference the caller along with the interpreter to 911 and remain on the call until the 911 operator authorizes 311 to disengage.

Language Line call volumes, broken down by the frequency of each language requested, are reviewed monthly by 311 and shared with the Mayor's Office of Immigrant Affairs quarterly to assess changes in the LEP population.



### **NYC.gov**

Over the past year, over 125 million visitors accessed pages across the almost 200 websites hosted on the NYC.gov platform. This represents an increase of approximately 15% over the prior year, while the use of the Google Translation widget during the same period increased by 25%, showing greater utilization by LEP individuals.

During that time, the public used the widget over a million times to translate content in the following languages: Spanish: 41%, Chinese (Simplified): 15%, Russian: 4%, Chinese (Traditional): 3.5%, Korean: 2%, Arabic: 2%, Bengali: 2%, French: 1.5%, Japanese: 1%, Polish: 1%. Haitian Creole: 1%, Yiddish: 1%, Italian: .5%, and Urdu: .5%.

### **GetFood**

Approximately 125 million meals were delivered to New Yorkers via the web-based GetFood program application during calendar year 2020 and the first half of 2021. That application can be translated into 12 languages other than English, and almost a quarter of all users employed the translation feature to access content in the following languages: Spanish: 81%, Chinese: 11%, Russian: 4%, Bengali: 1%, Arabic: 0.5%, Korean: 0.5%, Polish: 0.5%, Italian: 0.5%, French: 0.25%, Urdu: 0.25%, Yiddish: 0.25%, Haitian Creole: 0.25%.

### **NYC's Vaccine Finder**

Since its launch in early January, about 20 million people have visited the Vaccine Finder website. The Google widget was used approximately 530,000 times, or 3% of the time, to translate webpage content into the following languages: Spanish: 30%, Chinese (Simplified): 22%, Yiddish: 6%, Chinese (Traditional): 5%, Korean: 4%, Bengali: 3%, Russian: 3%, Arabic: 3%, French: 2.5%, Italian: 2%, Polish: 2%, Urdu: 1.5%, Haitian Creole: 1%. Japanese: .1%.

### **VAX4NYC**

The VAX4NYC website is fully accessible in the 10 languages required under Local Law 30.

The VAX4NYC Call Center has both English and Spanish-speaking agents on staff. For other languages, the call center has the ability to connect to Language Line, which supports over 175 languages. The IVR recording that callers hear when they dial the call center includes prompts for English, Spanish, Russian, Mandarin, Cantonese, Korean, and Haitian Creole. Agents are trained to recognize when Language Line would help them communicate with a caller. Language Line is also designed so that the correct language can be identified quickly, and a translator conferenced into the call. City vaccination sites are further equipped with Video Remote Interpretation (VRI) for 40+ languages including American Sign Language and audio interpretation for over 175 languages.

Of the 2 million appointments that have been made through [nyc.gov/vax4nyc](https://nyc.gov/vax4nyc), only approximately 1,500 have used the language translation feature. Of that group, the top translated languages were Chinese: 88%, Spanish: 10%, Korean: 0.8%, and Russian: 0.2%. Of the nearly 380,000 calls taken by the call center, almost 25% of

them used language translation services. Language translations were routinely conducted in Spanish: 79%, Mandarin: 15%, Cantonese: 2.5%, Russian: 2%, Korean: 1%, and Haitian Creole: 0.5%.

### **Factor 3: Nature and importance of services**

DoITT's 311 Customer Service Center provides callers with access to interpreters in the languages they request. Many callers require interpretation services to assist them in obtaining access to information that is provided by various agencies, including the Department of Housing, Preservation and Development, the Department of Transportation, the Department of Social Services' Human Resources Administration, etc. Without an interpreter, callers would not be able to obtain the information required to make informed decisions regarding their eligibility or how to access the services offered by many City agencies.

Over the last decade, people have increasingly moved online for access to information about important City services. As traffic has grown, so has the need to meet the public where they are, responsive to their mobile devices, and in the languages they speak. The NYC.gov platform is home to the vast majority of City agency and program websites, and it plays a vital role in connecting New Yorkers with government services. During the pandemic this past year, when it was difficult or impossible to receive services in person, connecting online became essential. DoITT helped agencies pivot by providing new and innovative solutions to connect New Yorkers with vital services, such as GetFood, the Vaccine Finder, and the VAX4NYC website and call center.

### **Factor 4: Resources available for language assistance**

DoITT and 311 provide various means for LEP New Yorkers to obtain access to City services and information.

- Messages in languages other than English have been included in 311 upfront IVR messaging solution for all callers.
- 311 utilizes the skills of its bilingual (Spanish) staff to support callers requiring telephonic interpretation services.
- 311 informs the public of language assistance services on its social media and text messaging channels and provides language assistance on these channels.
- Posters are displayed in a variety of languages to emphasize to staff and visitors 311's ability to communicate with the public in multiple languages.
- 311 also piloted an online survey available in multiple languages other than English to gauge LEP customer satisfaction. The survey was provided to better understand customer needs and their perception of the service offerings. The responses are being used to improve service delivery where possible. Future online surveys in multiple languages are being considered.
- DoITT implemented the Google Translate widget across the NYC.gov platform to help agencies provide for the dynamic, real-time translation of their webpages into more than 100 languages.

- DoITT also oversees the technical review and implementation of alternate solutions that utilize manual and machine-based translations on specific applications, as needed.

DoITT and 311 utilize the citywide Primary Agreement for telephonic language interpretation and translation services. In 2020, the cost incurred to provide these services was approximately \$1,951,000. Over \$860,000 of this was used by 311 for telephonic language interpretation and document translation, and approximately \$1,088,000 was used to support the City's contact tracing program and other initiatives of the Test & Trace Corps.

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

### **Document translation services**

Neither DoITT nor 311 routinely require document translation services to fulfill its mission, as neither regularly distributes documents to the public or the media, or place documents on New York City's Language Gateway. There are no essential documents that require translation at DoITT or 311. However, DoITT and 311 do utilize the citywide Primary Agreement with Language Line to provide these services when required to improve service delivery. All translation requirements (i.e., voice recordings or document translations) are determined on a case-by-case basis and are managed by the Language Access Coordinator. In most cases, where possible, in-house staff will also review translations provided by Language Line for accuracy.

In 2020, 311 piloted its first online customer satisfaction survey in multiple languages, which were Arabic, Bengali, Chinese – Simplified and Traditional, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu. This will continue as a means of evaluating services provided to LEP individuals and improving service delivery where necessary.

### **Telephonic interpretation services**

311's business model provides around-the-clock interpretation services for all callers -- 24 hours a day, 7 days a week, 365 days a year -- and has done so since 2003. This service is currently available in over 175 languages (including the 10 languages covered by Local Law 30) via Language Line.

311 is mandated to answer 80% of all calls within 30 seconds and must provide access to health and human services via its 211 dialing protocol in over 175 languages. Service level requirements are in place for the vendor that provides telephonic interpretation. It is the goal of 311 to provide a telephonic interpreter in Spanish, Cantonese, Mandarin, and Russian, the four most-commonly-requested languages, within 30 seconds.

In calendar year 2020, 311 completed 799,955 calls requiring an interpreter in 99 different languages.

## Language access in agency communications

311 utilizes a variety of channels to communicate with New Yorkers. On its primary social media channels, which are Twitter and Facebook, 311 communicates in English and Spanish. 311's online channel (i.e., 311 Online) via the NYC.gov website offers the ability to translate all 311 online content into over 100 languages. Additionally, 311 implemented a new channel allowing New Yorkers to send text messages to 311692 in both English and Spanish, to access services. There are plans to grow this service in additional languages as resources permit.

In 2008, a multi-lingual IVR system interface was first introduced and was subsequently upgraded in 2019 to provide enhanced non-English functionality. Callers can now communicate with the Natural Language Understanding (NLU) interactive speech application using direct dialogue in Spanish. NLU allows Spanish-speaking customers to ask their questions and receive answers in a natural language mode. The IVR service also provides callers who speak Spanish, Mandarin, Russian, Cantonese, Korean, and Haitian Creole with the option of listening to current 311 pre-recorded announcements such as "alternate side of the street parking" and COVID-19 information in their primary language. This shortens the wait time for callers seeking this information and eliminates the need for an agent or an interpreter to answer the call. During 2020, over 1,068,000 callers selected the IVR option to indicate their desire to be serviced in a language of their choice. After listening to the recording, callers have the option of requesting assistance in any of the other available languages, including those covered by Local Law 30. 311 will monitor feedback received from the public via its ongoing customer satisfaction surveys as a means of improving language access via the IVR and other channels.

## Plain language

311 embarked on a plain language initiative in 2011. All content in its Customer Relationship Management (CRM) system used by Call Center Representatives now appears in simple, clear, and concise language, free from extraneous words or technical jargon, for ease of understanding by members of the public.

## Policies and procedures

311 provides telephonic interpretation and translation services during day-to-day operations, as well as during emergencies. Customers contacting 311 are always advised of the availability of language assistance services. Additionally, Call Center Representatives are trained how to interact with LEP individuals to provide language accessibility for all callers or engage Language Line for assistance.

It is the role of the designated Language Access Coordinator to manage language access services as follows:

- Coordinate over the phone interpretation and document translation services via the approved contract vendors, and proactively manage the contractual relationship for these interpretation and translation services.
- Coordinate effective and timely interpretation and translation service for 311 service requests, complaints, correspondence, or other documents requiring translation.
- Document and report on the translation services requested and provided.
- Oversee the operational relationship with each interpretation and translation vendor.
- Collaborate with DCAS and DoITT's citywide contract's team on the provision of language access services related issues.
- Monitor vendor compliance with contractual service level agreements.
- Manage all internal document translation requests on behalf of DoITT and 311 with the vendor.
- Support the internal and external training, quality assurance, and operations teams at 311 and the vendor for interpreter and translator related items.
- Routinely review escalated calls for quality assurance purposes related to Language Line usage.
- Refer service problems through the vendor's Voice of the Customer (VOC) process.
- Interact with DoITT's telephony and IT personnel regarding technical issues encountered with Language Line and escalate to the vendor, if necessary, for resolution.

The Language Access Coordinators continue to monitor, maintain, and make recommendations to enhance, whenever possible, access to language services.

## **Notification of free interpretation signage**

Neither DoITT nor 311 have walk-in centers for the public. However, translated signs are displayed in the ten designated languages, as required by Local Law 30, in 311's call centers to emphasize to staff and visitors our ability to communicate with the public in multiple languages.

## **Beyond the required ten languages**

Customers contacting 311 can speak with an interpreter in over 175 languages through Language Line. An interpreter is available immediately via conference call to triage the desired language of the customer and provide the appropriately skilled interpreter whenever language assistance is required.

## Emergency preparedness and response

In case of emergency, 311 has a contingency plan that includes redundancy provided by an outsourced vendor. This allows for continuity of call taking services in the event of an emergency to ensure uninterrupted language accessibility. 311 maintains its ability to continue operations despite a natural disaster or other emergency as part of its Continuity of Operations Plan (COOP), as was demonstrated during the COVID-19 pandemic.

Additionally, Language Line's service level agreement for document translation requires accessibility to rush translation requests in the event of an emergency.

## VII. Training

All frontline 311 staff are trained on providing language services as new hires. There is also ongoing coaching and monitoring of calls to reinforce the need for, and importance of, language accessibility for callers.

Call Center Representatives receive 4 weeks of classroom training with an intense emphasis on customer service skills and techniques.

As part of the training, 311 CCRs are taught how to interface with LEP individuals, as follows:

- CCRs are instructed on how to handle a call when they are unable to readily identify the caller's language.
- CCRs who are unable to determine the language required by a caller will connect with Language Line and request to speak with someone who is skilled in language identification.
- CCRs utilize Computer Telephony Integration (CTI), which allows them to connect almost instantly to Language Line and conference an interpreter into the call.
- CCRs are trained to speak to the caller through the interpreter so that the caller receives the same service that an English-speaking caller would receive.
- During new hire training, 311 trainers review the prescribed tips for handling Language Line calls.

Internal bilingual Spanish-speaking staff at King Teleservices (a virtual offsite contact center utilized to support 311 during high call volume) must pass a language assessment test approved by the City to be qualified to handle 311's Spanish calls. 311's vendors, Language Line and Voiance, employ professional interpreters with years of experience and highly qualified testers to administer an Interpreter Skills Assessment Test. Interpreters are assessed on their ability to speak clearly, remain neutral, maintain accuracy in both languages, process information quickly and concisely, be sensitive to cultural differences, be professional and courteous, use appropriate industry terminology, and understand industry practices and procedures. Newly hired interpreters receive a three week orientation program and ongoing training and coaching.

DoITT, partnering with the Mayor's Office of People with Disabilities (MOPD), regularly offers digital accessibility trainings to City agency communications and web staffers. The trainings are mandatory before new sites are launched, and they have recently been conducted to help agencies audit their own web products. During the trainings, attendees are made aware of the advantages and limitations of the Google Translate widget. Agencies are encouraged to use plain language whenever possible and are informed of potential translation services available through MOIA. In the past year, DoITT and MOPD have offered 30 digital accessibility training sessions.

DoITT is an equal opportunity employer that is committed to upholding federal, state, and city EEO laws, as well as citywide EEO policies and procedures. During new hire training, as part of the customer service component, 311 CCRs are trained to be sensitive to the caller's needs and on how to professionally interact with LEP individuals. DoITT and 311 personnel also receive an EEO orientation class that addresses cultural diversity in the workplace when communicating with external customers. Posters written in a variety of languages are positioned throughout the 311 Call Center to remind personnel about the about the need for sensitivity when serving the diverse population of 311 callers.

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

All calls to 311 are recorded and all metrics related to language assistance services are readily accessible at 311 or via the vendor's portal. 311 maintains data pertaining to vendor services provided, 311 IVR metrics, and the 311 staff interpretation services that are provided to the public.

The 311 Quality Assurance (QA) team monitors recorded calls daily for all shifts to ensure compliance with Executive Order 120, Local Law 30, and DoITT/311 policy. Bilingual QA evaluators listen to Spanish calls and provide coaching and development to CCRs. 311 supervisory staff evaluate and coach Spanish calls. The QA team also evaluates calls handled in other languages to ensure that the English-speaking 311 call taker and the interpreter are working together to provide the caller with quality service. When a quality concern is raised by a caller, the 311 QA team, the vendor, and the interpreter are notified for corrective action. The same internal process applies to Spanish-speaking CCRs at 311.

Similarly, Language Line has a QA team that monitors live calls without the knowledge of the interpreter. A senior language specialist provides coaching, feedback, and identifies training needs and developmental opportunities.

Language Line has a formalized process known as the Voice of the Customer (VOC), which ensures that coaching feedback is provided in a timely manner regarding concerns expressed by the client and of any action taken. The vendor uses the VOC process to target the key areas that may require a developmental program for interpreters. 311 managers or supervisors may refer problematic

Language Line calls to the 311 Language Access Coordinator for review and escalation to the vendor.

Language Line provides monthly and quarterly reports via their portal, which includes both the number and duration of individual calls and for all calls combined. 311 also maintains metrics on the volume of calls handled by our bilingual employees and calls handled in languages other than English by our IVR.

**To ensure compliance with Executive Order 120 and Local Law 30, 311:**

- Provides language access in over 175 languages and dialects.
- Monitors call volumes and consumer needs daily and monthly.
- Records and retains in accordance with 311's Privacy Policy, all calls, including those utilizing an interpreter.
- Evaluates calls handled in other languages to measure the level of customer service. This is a large responsibility of our QA team.
- Reviews Language Line call volumes by language on a monthly basis, in addition to quarterly reviews by MOIA, to assess changes in the LEP population.
- Conducts routine reviews to determine the need to hire additional bilingual interpreters for other languages besides Spanish.
- Utilizes the vendor's VOC process to assess the performance of the vendor's interpreters.
- Ensures that all vendors engaged to provide language services have contractually agreed upon service level agreements.
- Obtains feedback from Community Boards, Borough Presidents' Offices and MOIA.
- Responds to caller feedback and complaints regarding language access issues, which may result in process improvements or service enhancements.
- Updates the Language Access Plan as required.

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

DCAS hosts the citywide Primary Agreement with all language service providers. 311's current vendor for interpretation and translation services, Language Line, is considered an expert in the industry. Voiance, a secondary citywide vendor, provides redundant interpretation services in the event of an emergency.

DoITT, 311, and the virtual contact center vendor (King TeleServices) continue to hire personnel who are bilingual in Spanish to ensure language accessibility in our most requested language.

DoITT and 311 use the Volunteer Language Bank to leverage City employees who are bilingual in many languages for proofreading documents that have been translated by vendors. New York City personnel are sometimes able to make alternate translation recommendations, suggesting foreign language



colloquialisms that are more widely understood by 311 callers. Internal staff are also used to evaluate IVR recordings provided by the vendor using professional voice interpreters.

As funding permits, 311's goal is to have all bilingual employees and volunteers certified through the Language Line proficiency testing. A contract is in place to provide these certification services.

## **X. Outreach and public awareness**

311 informs the public of language assistance services through its IVR platform, 311 Online on the NYC.gov platform, social media, and text messaging channels. Translation of cultural signs and photographs are displayed inside the 311 Customer Service Center in various languages to emphasize to staff and visitors (local and international invited delegations) our ability to communicate with the public in multiple languages. DoITT and 311 do not customarily distribute written materials to members of the public.

## **XI. Language access complaints**

311 is available for the public to make complaints and to provide information and referral services to other city, state and federal agencies while completing service requests for members of the public. It serves as a conduit to receive complaints about all city agencies.

311 can receive complaints, questions, and requests pertaining to language access from the public via all its channels. A customer may choose to submit these through any of 311's online channels (e.g., NYC.gov, social media, mobile application) or may call 311 directly. 311 forwards all language access complaints and requests pertaining to 311 to MOIA's Language Access Complaint mailbox and to the Language Access Coordinator.

All complaints and requests from customers are tracked via 311's CRM system and monitored by the Language Access Coordinator. It is the responsibility of the Language Access Coordinators to assure the timely resolution of any complaints or requests from customers regarding DoITT or 311 specifically. 311 reports the number of complaints received in its Language Access Plan annually and reports the number of language access requests as well.

## XII. Implementation plan logistics

The 311 Customer Service Center provides meaningful language access in over 175 languages and has been language accessible since early 2003. Existing contracts with our vendors currently address the full scope of the services required to maintain compliance with Local Law 30. Additionally, DoITT’s NYC.gov platform has included the Google Translation widget since 2015, making webpages accessible in over 100 languages. Neither DoITT nor 311 issue licenses or permits to their customers and, unlike some agencies, do not have walk-in centers for the public.

DoITT and 311 currently meet all requirements of Executive Order 120 and Local Law 30. 311 continues to maintain a plain language standard, which has been implemented for several years. DoITT and 311 will continue to review policies, procedures, and services to ensure compliance. DoITT and 311 will utilize feedback received from the ongoing customer satisfaction surveys to improve services to the LEP population.

<b>Language Access Goal</b>	<b>Milestones</b>	<b>Responsible Staff</b>	<b>Deadline</b>
Deploy additional customer satisfaction surveys in additional languages	Delivered the first customer satisfaction survey available in multiple languages in 2020	311 Customer Management Team	Not applicable

The following document outlines SBS' Language Access Implementation Plan for Local Law 30

## **I. Name and title of Language Access Coordinator**

- a. Department of Small Business Services
- b. Michael Silver, Senior Policy Advisor
- c. <https://www1.nyc.gov/site/sbs/about/language-access-plan.page>

## **II. Agency mission and background**

The Department of Small Business Services (SBS) helps unlock economic potential and create economic security for all New Yorkers by connecting New Yorkers to good jobs, creating stronger businesses, and building vibrant neighborhoods across the five boroughs.

We are focused on equity of opportunity that leads to economic self-sufficiency and mobility.

The agency interacts with the public in a variety of ways directly and through contracted vendors including:

### **Careers**

We prepare and help New Yorkers to find jobs and help businesses find the talent they need by:

- Developing job search skills through resume and interviewing workshops
- Training local residents to acquire skills in growing fields
- Connecting jobseekers to employers with open positions
- The Workforce1 Career Centers interact with the highest volume of individuals served by the agency. These customers are seeking jobs or job-related services such as training, career-advisement, workshops, and job search-related supports.

### **Businesses**

We help businesses start, operate, and grow in New York City by:

- Helping minority and women-owned businesses (M/WBEs) get City-certified and compete for contracts
- Connecting entrepreneurs to free resources ranging from business courses to legal services
- Explaining government rules and regulations
- Helping entrepreneurs apply for funding to launch or grow a business
- The NYC Business Solutions Centers are second in the volume of individuals accessing SBS services and in the amount of one-on-one support and interactions customers require. NYC Business Solutions assist entrepreneurs starting businesses, customers who often need more intensive support than established businesses and have fewer resources that they can draw upon internally.
- M/WBE, LBE and EBE Certification & Related Services provide access and support for business that aim to bid for and obtain City contracts; therefore it is essential that access to this program be available to LEP individuals. The additional programs and services listed serve increasingly larger and/or well-established businesses rather than individuals; or their services have, as an objective, improvements in customer-produced output that are English-only in nature; in this case, capitalizing on City, State and Federal Government contracting opportunities, which require that proposals be submitted in English

### **Neighborhoods**

We work with community-based organizations to build vibrant neighborhoods where New Yorkers can shop, work, and live by:

- Overseeing the largest network of Business Improvement Districts (BIDs) in the country, which delivers more than \$134 million in additional services throughout the five boroughs

- Offering training, tools, and one-on-one assistance to local community-based organizations
- Administering grant programs to strengthen and revitalize commercial districts
- Working with community partners to identify local commercial district needs and plan targeted solutions

### III. Agency language access policy and goals

SBS’ policy and goal is to obtain the highest possible quality of customer service, adhering to the spirit and the letter of Local Law 30, with the highest degree of operational flexibility and the lowest possible ongoing cost of operations. Given SBS’ presence in neighborhoods across the city and the proportion of Limited English Proficiency (LEP) persons in New York City, we must ensure that they can access our services despite language barriers. We will have successfully implemented our plan when providing LEP supports alongside English language offerings will be the new operating normal at SBS. We plan to measure and evaluate our progress to ensure that we are successful, as described in subsequent sections of this Language Access Plan.

To deliver on these goals, each division at SBS has a lead Language Access Coordinator who is responsible to interfacing directly with program managers within the division. The Language Access Coordinators will ensure that relevant staff within each division is fully aware of SBS’ language access policies and procedures.

### IV. Agency language access accomplishments and progress on goals from previous LAIP

Goal	Update
Establish budgets by division for contracted vendors	Complete July 2020
Re-train lead divisional Language Access (LA) leads, ensure role and responsibility is clear	Complete December 2020
Establish backup divisional Language Access personnel (to act in the role when LA lead is absent)	Complete December 2020
Train the backup personnel	Complete January 2021
Finalize and share LL 30 guidance, best practices and operations for using contracted vendors for LA leads and back ups	Complete February 2021
Assess most commonly distributed documents	Complete April 2021
Translate those documents that meet threshold for most common	Ongoing

### V. LEP population assessment

The SBS plan incorporates the following analysis which is a combination of the Four Factor Analysis and data collected from services provided from the agency.

1. Department of Justice Factor 1: Number/Proportion of LEP population

Using NYC Population Fact Finder we can isolate the universe of New Yorkers in need of language access. At the broadest level 49% of New Yorkers above the age of five and 23% are considered limited English proficient (LEP), meaning that they self-identify as speaking English “less than very well” or about 1.8 million people.

Source: [NYC Population FactFinder](#)

Local Law 30 are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish

2. Department of Justice Factor 2: The frequency with which LEP individuals come in contact with the program

SBS serves only an adult population. Again, using NYC Population Fact Finder, it is estimated that the relevant universe of LEP adults is approximately 75% of the 1.8 million mentioned or 1.2 – 1.3 million New Yorkers.

Source: [NYC Population FactFinder](#)

In addition, after evaluating the customer requests from across the agency and in accordance with LL30 we have determined the top ten languages most requested within our customer base in order of frequency are as follows:

- Spanish
- Russian
- Mandarin-Chinese
- Cantonese-Chinese
- Korean
- Haitian (French) Creole
- Fujianese-Chinese (Fuzhou)
- French
- Polish
- Bengali

3. Department of Justice Factor 3: The nature and importance of the program, activity, or service provided by the program

SBS has created Language Access Plan “Snapshots” for each of the Program Divisions and services outlined in the Agency Mission and Background section, with service-specific analysis as to LEP supports available, linguistic profile analyses performed, Essential Public Documents inventoried, etc. The Language Access Plan “Snapshots” allowed us to rank agency’s services according to priority level for implementation of the Language Access Plan. SBS’ Language Access Plan was built from these service-specific analyses, so that we can implement it in a targeted and effective way, understanding the baseline we have to work with and the service structure and constraints for each of the agency’s services.

More specifically SBS has LEP language support request tracking in place at all walk-in facilities where we serve adults including the Workforce1 Career Centers and at NYC Business Solutions Centers. There is a regular influx of LEP persons into all our walk-in facilities. In addition, for all public facing programming services have access to telephonic interpretation. As appropriate marketing and published materials are translated into the aforementioned languages.

4. Department of Justice Factor 4: Resources available to the Agency

- SBS Staff Foreign Language Skill Locator tool – internal database, searchable and accessible via SBS’ intranet, that contains foreign language skills and proficiency levels of SBS staff
- Walk-in facilities’ staff existing foreign language skills
- Signage and “I Speak” cards
- City-wide Volunteer Language Bank
- Vendor contracts for phone interpretation, in-person interpretation, and document translation
- Budgets dedicated by each division to accompany the contracted services established each year based on projected needs
  - In FY21 the SBS budget for these contracted vendors exceeded \$80,000

**Evaluation of language access needs of agency’s service population:**

As indicated in the evaluation in factor 2, SBS has incorporated customer requests as additional data sources to evaluate the language access needs of the service population. SBS will continue to work with each division to assess their respective engagement with New Yorkers and small business owners with Limited English Proficiency.

**Provision of language access services**

In general, SBS provides language access in the three following ways. Please see below for additional details and processes.

- Signage at Public Service Locations
  - SBS will ensure that appropriate signage has been installed in all center locations serving the public
  - If any new centers are opened in the five boroughs programs will be required to ensure proper signage at all locations.
- Interpretation Services
  - SBS has access to a Telephone Interpretation Vendor: Voiance is the current phone interpretation provider when a staff member is not available.
  - In-Person Interpretation Vendor: When holding community meetings, press events, and other larger scale in-person interactions, we rely on both bilingual staff and an in-person interpreter provided by our vendor, Geneva Worldwide.
- Translation of Written Material
  - Essential Public Documents: This is an ongoing need as our services and programs evolve to meet the needs of the market and community. As new programs are developed we ensure that translation are happening appropriately.
  - Marketing Materials/Notice of Services Provided: This is an ongoing need as our services evolve to meet the needs of the market and community.
- Contracted Vendors
  - SBS delivers services through contracted vendors in many cases, most notably through the Workforce1 Career Centers (jobseekers) and NYC Business Solutions Centers (small businesses).
  - All the resources and tools listed above are available to ensure the provision of services can be delivered to LEP persons through these vendors at walk in locations. The lead Language Access coordinator for each division is responsible to for ensuring vendors are equipped and using these tools.
  - In addition, SBS has requested that contracted vendors recruit and hire bilingual staff at the walk-in centers to meet the needs of the community in which they serve. We see this

request as incremental to the basic service provision delivered primarily through contracted language access vendors and therefore an opportunity to help our vendors reflect the communities they serve.

#### Translation:

- Each division in the agency has identified the most commonly distributed collateral by volume and has prioritized translation of these by the frequency of need in languages other than English. All documents and the translated versions are available for download and use on SBS' internal web.
- The identification of essential public documents for translation as well as marketing materials will be an ongoing need as our services evolve to meet the needs of the market and communities served.
- As an example of translated documents, collateral used by SBS' Compliance Advisors for businesses in retail, food service, and personal care have each been translated into 10 languages based on the population of business owner's languages spoken.
- Other divisions have prioritized documents for translation in a similar fashion.
- For new translations, the agency has a process outlined below for the additional documents to be converted into other languages:
  - Through the division's Language Access Coordinator, SBS staff will work with the Communications team to identify outreach purpose, the intended target audience and define how the document will be distributed.
  - Define the following items for all documents, posts, or presentations to be translated
    - SBS Division or Center requesting translation
    - From which language(s) to which language(s)
    - Deadline or due date for finished product
    - Number of words to be translated
    - Incorporation of the principles of plain language using guidance from the Mayor's Office of Adult Education/Mayor's Office of Immigrant Affairs publication on Easy-to-Read NYC Guidelines for Clear and Effective Communication and <https://www.plainlanguage.gov/>

#### Interpretation:

- SBS provides different options for assisting customers who are limited English proficient including resources primarily through contracted vendors. In addition the SBS Language Bank and the Citywide Volunteer Language Bank is available. Below are the three ways customers can be assisted:
- For walk-in customers at center locations:
  1. Customer indicates his or her preferred language from the *Free Interpretation Service Available* poster. If the preferred language is not available on the poster, please call our telephonic interpretation vendor.
  2. Once the preferred language has been indicated, complete an I Speak card on the customer's behalf. The customer should carry the I Speak card with him/her and show it at any New York City government agency.
  3. All assistance communicating with customers will occur through the use of telephonic interpretation
- For services delivered via telephone, including our Business Restart Hotline, the use of telephonic interpretation is available to all staff to ensure communication with business owners with LEP.
- For In-Person Interpretation: Professional interpreters are available through our vendor Geneva. Teams seeking interpretation should complete the request form and email the completed form and anything that will help provide context like a presentation, brochure, flyer, to the division's dedicated Language Access Coordinator.
  - These services are available to be delivered virtually as well.

#### Emergency Preparedness and Response:

SBS has incorporated Emergency Preparedness Plan to ensure that customers who are limited English proficient are able to access language services during an emergency. This plan includes ensuring that documents are translated and signage in public locations is conspicuous, appropriate multilingual signage and LEP identification tools are available at emergency sites, interpreters can be contacted and utilized, and other translation resources and vendors are available in the event of an emergency.

SBS's contracts with vendors provides for rapid fast turnaround of translations. For written translations, we have established protocols for expedited service with the vendor which has worked well. In addition, the SBS Website and NYC Business (which SBS helps operate) has the most commonly delivered services and request available in 10 languages so information can be disseminated digitally. SBS commonly works with ethnic media outlets to announce programming and to the local community in the preferred languages.

## **VI. Training**

**Agency Staff:** Each division at SBS has a lead Language Access Coordinator who is responsible to interfacing directly with program managers within the division. The Language Access Coordinators will ensure that relevant staff within each division is fully aware of SBS' language access policies and procedures and can deliver services to all constituents including those with Limited English Proficiency. The divisional Language Access Coordinators are also responsible for setting a divisional budget for each contracted vendor for Language Access. Finally in order to ensure continuity of service without interruption a backup for each division has been assigned and trained.

The Language Access Coordinator will conduct trainings minimally once each year with the relevant staff within the division and as needed ad hoc training can be provided to new staff as they are on-boarded. Relevant staff will include any individuals overseeing programming or contracts with vendors that provide direct services to the public. Aside from SBS and City policy and standard procedures, training will include topics such as City demographics, resources to evaluate the demographics for targeted populations or geographies, historical data on programs to inform the best approach to ensure access is readily available. All trainees will be made aware of the internal web that SBS provides to allow for individuals to self-serve and have access to all language access resources. These include the following resources, among others:

- "I Speak" cards and "Free Interpretation" posters to download
- SBS Language Bank
- City Language Bank
- How to access professional interpretation and translation services
- Walk-In Center Resources
- Mayor's Office of Adult Education/Mayor's Office of Immigrant Affairs publication on Easy-to-Read NYC Guidelines for Clear and Effective Communication and <https://www.plainlanguage.gov/>

The SBS Language Access Plan primary contact will ensure that Language Access Coordinators have the materials and resources needed and will join trainings as necessary, and that trainings are happening as planned.

**Vendor Staff:** For divisions at SBS that have contracted vendors that provide services, the Language Access Coordinator will ensure that with program managers within the division who manage these contracts are fully. As necessary the Language Access Coordinators will provide training to vendor staff on SBS' language access policies and procedures.

## **VII. Record keeping and evaluation**



SBS will track services and maintain records of language services with its various Customer Relationship Management (CRM) tools which vary by program and division.

In addition, SBS will maintain a log of all translation and interpretation services utilized. 311 inquiries for Language Access will be tracked and logged with SBS' internal database for all 311 inquiries. Complaints submitted electronically will be tracked and logged with the appropriate CRM system.

Each division will perform a

1. Periodic examination of demographics data of customers served; as gaps in service and need are identified, use data to determine how additional services should be provided in new languages or documents require translation
2. Annual evaluation of complaints submitted to agency and determination if systematic action is required

## **VIII. Resource analysis and planning**

SBS will leverage the following structure and resources to implement the language access plan.

- Organizational structure with lead Language Access Coordinator who is responsible for ensuring each division implementation of the plan
- Telephonic Interpretation: Language Line
- Document translation: Geneva Worldwide
- In Person Interpretation: Geneva Worldwide
- SBS Language Bank: Database of SBS employees and proficiency with various languages who have agreed to help review documents and provide services
- Citywide Language Bank: Database of City employees and proficiency with various languages
- SBS' marketing and communications team for design and layout of collateral
- Various customer relationship management (CRM)
- SBS communications and marketing personnel

In order to identify and close gaps in access in service, SBS will follow this protocol:

SBS will continue to work towards the delivery of quality language assistance services. In order to continually improve, SBS will take the following steps:

1. Evaluate the vendor performance annually and ad hoc as inquiries and complaints necessitate.
2. Provide additional ad hoc training as needed for SBS staff and/or contracted service vendors requiring additional assistance understanding
3. As mentioned previously, the work that will be done in the summer to evaluate language access at our physical locations will inform our work and provision of language access.

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

SBS provides services in multiple languages at its Workforce1 Career Centers located across NYC for jobseekers, and 7 NYC Business Solutions Centers for entrepreneurs. SBS also promotes programs for entrepreneurs and jobseekers in multiple languages across various SBS platforms:

- Social media channels including Twitter and Facebook
- Direct email marketing
- Advertising in ethnic media publications (as resources allow)
- Printed marketing materials

- Website

SBS also works directly with ethnic press to promote services that are available in multiple languages.

## X. Language Access complaints

SBS will monitor and respond to all public complains about Language Access through both 311 and any other inquiries through its website via “contact us” portals within 3 business days.

Inquiries and complaints about Language Access will be received depending on the methodology of the inquiry or complaint. For calls via 311, SBS will receive the inquiry via email from 311Agency Analyst which will be directed to the Language Access Coordinator overseeing the program or initiative in question and will work with program teams to address the issue. For inquiries submitted electronically, division Language Access Coordinators will be notified and will work with program teams to address the query.

311 inquiries for Language Access will be tracked and logged with the appropriate CRM system, ultimately with the single solution.

All inquiries will be reported annually.

## XI. Implementation plan logistics

The SBS implementation plan logistics are outlined in the table below:

Language access goal	Milestones	Responsible staff	Deadline
Identify any most commonly distributed documents not yet translated	Each division LA Coordinator to identify	SBS Language Access Coordinator and Communications team	June 2021
Translate any essential documents not yet translated		SBS Language Access Coordinator and Division Language Access Coordinators	August 2021
Establish budgets for FY22		SBS Language Access Coordinator and Division Language Access Coordinators	July 2021
Establish training dates for each division	Each division to set schedule	SBS Language Access Coordinator and Division Language Access Coordinators	July 2021
Plan for the promotion of multilingual material to ensure that people and businesses can find information and services readily		SBS Language Access Coordinator and Division Language Access Coordinators and Communications Dept	September 2021

Complete annual training for each divisions	By the end of each Fiscal Year	SBS Language Access Coordinator and Division Language Access Coordinators	October 2021
Evaluation of vendors and services		SBS Language Access Coordinator, Division Language Access Coordinators, vendors	October 2021
New programs and most commonly distributed documents translated	As new programming is established, funded, and launched	Division Language Access Coordinators and Communications team	Ongoing

## Language Access Implementation Plan (2021)

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

New York City Taxi and Limousine Commission (NYC TLC)  
Wendy Marte Pilar, Language Access Coordinator & Policy Analyst  
[https://www1.nyc.gov/site/tlc/about/language\\_access.page](https://www1.nyc.gov/site/tlc/about/language_access.page)

### II. Agency mission and background

The Taxi and Limousine Commission (TLC) is committed to providing quality customer service to all TLC Licensees and members of the public, including those who have limited-English Proficiency (LEP). TLC Licensees represent the diversity of New York City, with Drivers born in dozens of countries and speaking more than 100 different languages.

### III. Agency language access policy and goals

It is TLC's Language Access Policy to:

- Provide telephonic interpretation for all individuals served in person and via telephone
- Maintain multilingual signage advertising the availability of free interpretation at all our facilities
- Translate the most commonly distributed documents and communications containing essential licensing and passenger safety information into the top 10 City-mandated languages
- Consider language needs in all outreach efforts and provide language services at public events

### IV. Agency language access accomplishments and progress on goals from previous LAIP 2018

Since 2018, the TLC has accomplished the following Language Access goals:

- Trained customer-facing staff in language access requirements and protocol
- Dedicated additional resources to provide simultaneous interpretation at Commission Hearings
- Established processes to translate all Licensee-wide email blasts into the top 10 languages
- Incorporated comprehensive language access provisions in the agency's continuity of operations plan (COOP)
- Included Language Access information on TLC's webpage
- Expanded translations of most commonly distributed documents to include Hindi and Punjabi, languages beyond the top 10 City-designated
- Distributed translated materials of our top outreach campaigns (Driver Pay, FHV Accessibility, and Service Refusal/Inclusion) at libraries, community organizations, elected official's offices, and industry stakeholder groups.

- Contracted a secondary document translation vendor to provide fast turnaround translations in cases of emergency

## **V. LEP population assessment**

Factor 1: The number or proportion of LEP persons in the eligible service population

Drivers represent the largest category of TLC Licensees, with over 175,000 currently licensed by TLC. Many of these drivers also hold additional TLC licenses (for example, drivers often own the vehicles they operate and are licensed as drivers and vehicle owners).

TLC-licensed drivers represent the diversity of New York City. Professional drivers are born in dozens of countries and speak over 100 different languages. Over half of all drivers hail from five countries: Bangladesh, the Dominican Republic, Pakistan, the United States, and India. Over 85 percent of drivers live within the five boroughs, predominantly in Queens and Brooklyn.

Other than English, the most common languages spoken by TLC Licensees are Spanish, Bengali, Chinese (Cantonese, Mandarin, and Formosan), Russian, Arabic, Urdu, French, Hindi, and Punjabi.

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

TLC staff interact with the public in person at TLC's Customer Service Center, Woodside Inspection Facility, and Outreach Events. Additionally, staff interacts with the public over the phone and via email, social media, and web content.

While TLC has reduced the need for most Licensees to appear in person, certain transactions still needed to occur in-person. At the Customer Service Center, the Licensing Division served over 25,000 customers during CY 2020. At the Woodside Inspection Facility, TLC staff performed 95,857 vehicle inspections during CY 2020. Additionally, TLC's Licensing and Prosecution Divisions answered 192,153 calls during CY 2020.

The External Affairs Division sends informative emails to Licensees throughout the year. In 2020, External Affairs shared information on COVID testing, health updates, available resources, work opportunities (such as TLC Food Delivery), and agency updates. External Affairs staff personally speaks with hundreds of drivers, sharing information and answering questions. Additionally, staff shares information on our TLC website and social media, informing drivers in a wide variety of channels.

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

Failure to provide language access services to the LEP population would negatively impact our licensees and the broad agency charge of furthering safe and reliable for-hire transportation in the City. By providing adequate language access services, we can help our Licensees to obtain and maintain a license with the TLC.

### **Factor 4: Available language access resources**

TLC relies primarily on citywide contracts for document translation and telephonic, in-person, and virtual interpretation to provide necessary language access services. TLC has a dedicated Language

Access Coordinator within the Office of External Affairs and a Language Access Cabinet comprised of supervisors from each customer-facing TLC Unit or Division.

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

### **Translation**

TLC uses the services of Geneva Worldwide, Inc. to translate English documents and communications. Some examples of documents and communications translated into the top 10 City-designated languages include:

- Essential licensing guides, forms, applications, and checklists
- Licensee-wide email blasts about TLC rules and regulations
- Licensee-wide email blasts about TLC and partner agency events and resources
- Industry Notices explaining new TLC rules and policies
- Citywide distributed passenger informational materials (e.g., palm cards, videos, etc.) about TLC's Accessibility, Safety, and Inclusion initiatives.

TLC uses employees within the TLC, staff from TLC-Approved Driver Education, and staff from TLC industry stakeholders to ensure the quality of all our translated materials. Our reviewers are a mix of native speakers, bilingual, or highly proficient in the target languages, and many have years of experience translating in the for-hire industry. To review high-profile documents and communications, such as our required Driver Education Exam, TLC has secondary contracts with consultants certified by the American Translators Association (ATA).

As of September 2020, the TLC also has a secondary document translation vendor, International Language Services Inc., for emergency translations that require faster turnaround.

### **Telephonic Interpretation**

TLC currently uses the vendor Voiance Language Services, LLC. for telephonic interpretation. All TLC staff has access to telephonic interpretation services from any TLC telephone or TLC mobile device. Instructions on how to access telephonic interpretation services are available on the agency's intranet site. Additionally, frontline staff who most frequently access telephonic interpretation have been provided with phone labels to access a phone interpreter quickly.

### **In-person Interpretation**

TLC currently uses Accurate Communication, Inc. for in-person interpretation. In addition to securing interpreters through the contracted vendor, TLC's multilingual outreach staff are frequently assigned to attend events based on their language skills and the anticipated language needs of the audience.

In 2020, the TLC saw the need to expand its interpretation services to virtual platforms. TLC has used the in-person interpretation vendor Accurate Communication, Inc. to fulfill this service. In 2021, TLC is seeking other interpretation solutions that can provide simultaneous virtual interpretation in multiple languages.

### **Language Access in Agency Communications**

At all Commission Hearings and Meeting we provide interpretation services as needed for the public. We either provide consecutive or simultaneous interpretation depending on the need. All emails to licensees are translated in the top 10 languages and Hindi and Punjabi.

### **Plain Language**

TLC staff trained in plain language best practices review and edit all public-facing documents before they are translated. As part of this review, TLC staff also determines whether the content is “essential” (information necessary to obtain or maintain a TLC license) and, as such, should be translated into the top 10 citywide designated languages and additional languages base on our licensee population.

### **Missing: Policies and Procedures**

Policies and Procedures – the plan explains: The policies and procedures the agency has that explain, for example, how to identify and track an individual’s language, how to utilize the appropriate resource to provide language services, how to request that material be translated.

### **Multilingual Signage**

TLC displays “Interpreting Services Available” signage in prominent locations at all its facilities. The signs and posters provide “Point to your language. An interpreter will be called.” instructions in 20 languages and state that interpretation is available at no cost. TLC’s Operations Unit frequently monitors the condition and placement of the signs to ensure compliance.

### **Languages beyond Top 10**

TLC data shows that over half of all drivers hail from five countries: Bangladesh, the Dominican Republic, Pakistan, the United States, and India. While the TLC does not have exact data on the number of all LEP drivers, we will continue to devote resources to translate our essential documents into the top 10 languages plus Hindi and Punjabi, which are not included in the top 10 but are common in our population.

### **Emergency Preparedness and Response**

TLC has a bank of language for emergency communications that have been translated into the top 10 City-mandated languages as well as Hindi and Punjabi. In those instances where emergency messages go beyond those of the current bank, the TLC utilizes expedited translation services through its contracted language services provider or submits expedited translation requests through the Mayor’s Office of Immigrant Affairs to quickly translate tailored emergency communications.

## **VII. Training**

TLC’s Language Access Coordinator works with TLC’s Training Unit to ensure all frontline staff is trained on language access requirements and best practices. The training includes resources on how to identify an individual's primary language and how to utilize telephonic interpretation services. TLC's Training Unit also provides diversity awareness information to all TLC staff. All training formal trainings are tracked and all frontline new hires receive guidance from their supervisors on language access best practices.

**VIII. Record keeping and evaluation**

TLC tracks and evaluates language access goals through a combination of indicators. TLC maintains records of the agency's language services through monthly invoices and reports from our interpretation and translation vendors. Additionally, we have a Language Access Cabinet comprised of staff from across various TLC divisions. Staff on the Language Access Cabinet regularly communicate with the Language Access Coordinator to report on the quality of language access services and highlight areas where services should be improved, or additional agency support is needed.

**IX. Resource analysis and planning**

Each year, the Language Access Coordinator reviews Language Access metrics to determine the sufficiency of available resources to meet the current LEP population's needs and recommend any necessary resource allocation changes. The Language Access Cabinet monitors the Agency's language access services to identify gaps in services, offer solutions to close these gaps, and implement changes to improve the quality of language access services provided.

The TLC has the following task orders in place from September 2019 through July 2021

<b>Service</b>	<b>Contracted Vendor</b>	<b>Task Order Amount</b>
Document Translation	Geneva Worldwide, Inc.	\$260,878.50
Telephonic Interpretation	Voiance Language Services, LLC.	\$80,000.00
In-Person and Virtual Interpretation (Consecutive and Simultaneous)	Accurate Communication, Inc.	\$86,331.20

As of September 2020, the TLC also has a secondary document translation vendor, International Language Services Inc., for emergency translations that require faster turnaround.

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

TLC promotes public awareness of language access services through signage at all TLC facilities. TLC staff are also trained to identify LEP individuals' preferred language and offer language access services. Additionally, our External Affairs team provides TLC and other city agencies materials and resources in several languages to our licensees through a bi-monthly newsletter, emails, and phone calls. Before attending outreach events, the External Affairs team assesses the need for in-person interpretation. Through Driver intake forms, individuals' preferred languages are recorded and tracked.

TLC informs the public of the availability of free language services through:





- Multilingual signs and posters at all TLC facilities
- Translations on the agency’s website
- Email blasts to licensees specifying if language services will be provided at public events
- Mailing of translated materials to elected officials’ offices, partner city agencies, public libraries, and industry stakeholder groups

**XI. Language Access complaints**

The Language Access Coordinator monitors all language access complaints. Staff responsible for the intake and review of 311 complaints and written correspondence forward language access complaints to the Coordinator. The Language Access Coordinator also works with the Mayor's Office of Immigrant Affairs and 311 to ensure these complaints are received and addressed. The agency's number of language access complaints will be included in all annual language access assessments.

The public can submit language access complaints, questions, and requests to the agency via 311 or write to the Language Access Coordinator at [tlcexternalaffairs@tlc.nyc.gov](mailto:tlcexternalaffairs@tlc.nyc.gov). Members of the Language Access Cabinet notify the Language Access Coordinator if their corresponding units receive any Language Access Complaints.

TLC’s language access webpage informs the public that they can submit language access complaints through 311 or email the Language Access Coordinator at [tlcexternalaffairs@tlc.nyc.gov](mailto:tlcexternalaffairs@tlc.nyc.gov).

**XII. Implementation plan logistics**

<b>Language access goal</b>	<b>Milestones</b>	<b>Responsible staff</b>	<b>Deadline</b>
Provide most commonly distributed Licensing forms in the top 10 languages plus Hindi and Punjabi	Finalize translation of selected documents  Post all documents on TLC’s website	Office of External Affairs  Licensing Division  Web Unit	April 2021
Provide translations on TLC’s online platforms TLC UP and LARS	Create How-To-Guides  Conduct User Testing of guides with TLC internal and external stakeholders  Translate and post guides online	Office of External Affairs  Licensing Analytics  Web Unit	April 2021
Expand Virtual Simultaneous Interpretation at Commission Hearings	Secure interpretation vendor with capacity for virtual interpretation in at	Office of External Affairs  Operations Unit	Ongoing through 2021



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Commission**

	least five languages simultaneously		
Develop agency-wide online Language Access Training	Adapt existing Language Access Training to an online platform	Training Unit Office of External Affairs	Summer 2022