

Local Law 30 Report

Submitted to City Council by:

the Mayor's Office of Immigrant Affairs and the Mayor's Office of Operations

June 30th, 2018

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Introduction

The Mayor's Office of Immigrant Affairs and the Mayor's Office of Operations are pleased to submit this first annual report to the City Council in compliance with Local Law 30 of 2017.

To improve access to City government information and services by New Yorkers with limited English proficiency (LEP), the City Council passed Intro 1181 in February 2017. The bill expanded and codified Executive Order 120 of 2008, which had previously guided the City's efforts on language access, into the City Charter and Administrative Code. On March 18, 2017, Intro 1181 became Local Law 30 (LL30).

The Office of the Language Services Coordinator, based in the Mayor's Office of Operations (Ops) and the Mayor's Office of Immigrant Affairs (MOIA) and led by MOIA, is tasked with coordinating City agencies to ensure meaningful access to information and public services. Following the passage of LL30, in consultation with the Law Department, MOIA developed guidance and provided technical assistance to City agencies specifically about LL30 and more broadly about improving language access to better serve and engage a multilingual city. As part of its ongoing commitment to language access, MOIA will continue to support agencies in the implementation of LL30, including ongoing refinement of their implementation plans and delivery of language services as set out in their inaugural plans which are attached herein.

Pursuant to the provisions established in section 6 of LL30, on May 15, 2017, MOIA issued a preliminary list of Designated Citywide Languages based on parameters set out in the law. Except for this particular requirement, Local Law 30 had an effective date of July 1, 2017.

In compliance with LL30, MOIA is submitting this first annual report to the City Council with the following mandated components for each agency subject to the requirements of section 23-1102 of the NYC Administrative Code:

- the name of the individual designated as the agency's language access coordinator, including all titles held by such individual;
- the agency's language access implementation plan;
- 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 such complaints and requests were addressed.

This report also includes:

- 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 designated citywide languages, created pursuant to section 23-1101 of the NYC Administrative Code, as well as the data relied upon for its creation.

Overview of MOIA's LL30 Implementation Efforts

MOIA has provided robust implementation guidance and oversight to support agencies in understanding their obligations under LL30. MOIA has:

- Developed and distributed guidance documents for agencies that explain the law's requirements and how to write a Language Access Implementation Plan;
- Held meetings with agencies' language access coordinators around LL30 requirements, implementation and language access best practices;
- Analyzed language data and developed a list of 10 designated citywide languages, using methodology outlined in LL30;
- Ensured that agency heads were aware of obligations under LL30 by issuing a memo about LL30's requirements and upcoming deadlines;
- Provided targeted technical assistance by meeting one-on-one with individual agencies to guide them specifically on LL30 implementation and more broadly on improving language access; and
- Reviewed and provided feedback on agencies' draft language access implementation plans.

Agency Language Access Coordinators and 311 Information

As required under Local Law 30, the below chart includes the name of each agency’s language access coordinator and other titles this individual holds at their agency, a description of how members of the public can submit language access comments, the number of language access complaints and requests for additional language services received in calendar year 2017, and an overview of how complaints and requests were resolved. Data on language access complaints, questions, and requests come from 311 and 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 broad needs for interpretation at a facility or agency service or materials that should be translated into additional languages to support language access, not individual requests for interpretation.

Agency Name: 311 (DoITT)	
Language Access Coordinator: Michael Hutchinson, Finance and Contracts Director	
How members of the public can submit language access complaints/questions/requests: The public can submit via phone, text, chat, online and social media.	
Number of complaints received: 2	Number of requests received: 0
How complaints were handled: Both complaints were submitted anonymously. No further action required.	How requests were handled: N/A
Agency Name: Administration for Children’s Services (ACS)	
Language Access Coordinator: Eric Brettschneider, First Deputy Commissioner	
How members of the public can submit language access complaints/questions/requests: The Office of Advocacy receives language access inquiries through multiple channels, including 311 calls, referrals from multiple ACS divisions, walk-in and agency-wide monthly surveys.	
Number of complaints received: 193	Number of requests received: 0
How complaints were handled: <i>Step 1:</i> Office of Advocacy (OOA) researches the complaint by speaking to the source and/or reviewing any pertinent ACS records, including case notes. <i>Step 2:</i> OOA alerts the source to their rights and options. <i>Step 3:</i> OOA contacts the ACS division primarily implicated, usually higher up the chain of command than at whatever level the complaint originated, in the event that additional supervision and/or training of a worker who is not under our supervision seems called for. <i>Step 4:</i> OOA asks the division primarily implicated to loop back to once they have achieved a resolution, so that OOA can close the loop with the source of the complaint, or be prepared to advise that the complainant should	How requests were handled: None recorded during this period.

they contact Office of Advocacy again. <i>Step 5:</i> Chart the interaction in our correspondence system for future reference.	
Agency Name: Civilian Complaint Review Board (CCRB)	
Language Access Coordinator: Edwin Peña, Investigative Manager and & Jessica Peña, Senior Investigative Manager	
How members of the public can submit language access complaints/questions/requests: Members of the public can submit a language access complaint by contacting 311 by phone, email or online or contacting CCRB's language access coordinator, whose information is on the CCRB website.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Commission on Human Rights (CCHR)	
Language Access Coordinator: Edwin Tablada, Policy Analyst	
How members of the public can submit language access complaints/questions/requests: Members of the public can submit language access complaints and requests through 311 or the CCHR Infoline. Questions about language access at the Commission can also be submitted through the Infoline.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department for the Aging (DFTA)	
Language Access Coordinator: LaTrella Penny, Director, Planning, Policy and Analysis, and Sandy March Planning and Policy Analyst, Planning, Policy and Analysis	
How members of the public can submit language access complaints/questions/requests: Members of the public can submit language access complaints, questions, and/or requests by calling 311 or visiting the "contact us" link on DFTA's website.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department of Buildings (DOB)	
Language Access Coordinator: Lisa Lewis, Director of Customer Service	
How members of the public can submit language access complaints/questions/requests: A member of the public may call or submit an online request to 311.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department of City Planning (DCP)	
Language Access Coordinator: Dominick Answini, Assistant General Counsel	
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 LAP) or by contacting Luis Falcon at (212) 720-3379, LFalcon@planning.nyc.gov .	

Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department of Citywide Administrative Services (DCAS)	
Language Access Coordinator: Letisha M. Parks, Director, Agency Support Services	
How members of the public can submit language access complaints/questions/requests: Members of the public can submit language access complaints, questions and requests, by calling 311 or by contacting the agency through "About DCAS" section of the DCAS website.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department of Consumer Affairs (DCA)	
Language Access Coordinator: Casey Adams, Director of City Legislative Affairs	
How members of the public can submit language access complaints/questions/requests: Members of the public may submit language access complaints, questions, and requests through DCA's website, via DCA's social media, and through 311.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department of Corrections (DOC)	
Language Access Coordinator: Diane Murray Ward	
How members of the public can submit language access complaints/questions/requests: Members of the public submit language access complaints, questions and requests, by calling 311 or by contacting the DOC Office of Constituent and Grievance Services via phone, email or the DOC website.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department of Design and Construction (DDC)	
Language Access Coordinator: Dalela Harrison, Agency Equal Employment Opportunity Office	
How members of the public can submit language access complaints/questions/requests: The public can submit through 311. The public will also be able to submit language access requests through the agency website or via-email by August 2018.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department of Environmental Protection (DEP)	
Language Access Coordinator: Sara Pecker, Director - Special Projects & Initiatives	
How members of the public can submit language access complaints/questions/requests: The public can submit language access complaints, questions, and requests through 311. Any actions are sent to DEP's correspondence unit for a response.	
Number of complaints received: 0	Number of requests received: 0

How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department of Finance (DOF)	
Language Access Coordinator: Stina Trainor, Assistant Commissioner, External Affairs	
How members of the public can submit language access complaints/questions/requests: The public can submit requests, questions or complaints via email, phone calls, regular mail, in person at our business centers, or at outreach events attended by DOF staff. Submissions through 311 are handled by MOIA and forwarded to DOF.	
Number of complaints received: 1	Number of requests received: 0
How complaints were handled: Complaints via 311 are forwarded to the Language Access Liaison, who responds under the direction of the Language Access Coordinator.	How requests were handled: N/A
Agency Name: Department of Health and Mental Hygiene (DOHMH)	
Language Access Coordinator: Luis Valle, Language Access Manager	
How members of the public can submit language access complaints/questions/requests: Members call 311 and request to file a language access complaint about our agency. That complaint is then sent to our IQ tracking systems.	
Number of complaints received: 2	Number of requests received: 0
How complaints were handled: Language Access complaints/questions and requests are automatically uploaded to our IQ correspondence tracking system via the email address healthnyclink@health.nyc.gov . Samantha Steingard, the Special Projects Manager, has oversight over all correspondence, including this tracking system. The IQ system routes these complaints/questions and requests to the pertinent bureau or program. The language access coordinator is copied on all correspondence relating to language access. The bureau or program then has 14 calendar days to respond to the request.	How requests were handled: N/A
Agency Name: Department of Housing Preservation and Development (HPD)	
Language Access Coordinator: Sean Soun, Executive Director of Operations, Human Resources	
How members of the public can submit language access complaints/questions/requests: Members of the public can log a complaint through 311, through HPD's website (multiple emails, including the Commissioner's), and multiple phone numbers depending on the service the public is seeking.	
Number of complaints received: 1	Number of requests received: 0
How complaints were handled: Language access complaints from NYC 311 are routed through the First Deputy Commissioner's office to the	How requests were handled: N/A

appropriate program area for response. Tenant requested to reschedule inspection appointment since English was not their first language.	
Agency Name: Department of Parks and Recreation (DPR)	
Language Access Coordinator: Karina Smith, Chief of Staff, Community Outreach	
How members of the public can submit language access complaints/questions/requests: The public can submit language access complaints, inquiries or requests via 311, by mail, or by visiting the “Contact Us” section of our website	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department of Probation (DOP)	
Language Access Coordinator: Phyllis R. DeLisio, Assistant to Commissioner Bermudez, Diversity and EEO Officer/Disability Rights Manager, and Facilities and Fleet Administrator	
How members of the public can submit language access complaints/questions/requests: Members of the public can submit through 311. Also, flyers distributed to public events provide a phone number to call for language access needs.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department of Records (DORIS)	
Language Access Coordinator: Gerald Rosero, Special Assistant to the Commissioner	
How members of the public can submit language access complaints/questions/requests: Members of the public may submit complaints, questions, or requests either by calling 311 or by submitting a request to department staff.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: DORIS did not receive any complaints or requests for language services for CY 2017.	How requests were handled: DORIS did not receive any complaints or requests for language services for CY 2017.
Agency Name: Department of Sanitation (DSNY)	
Language Access Coordinator: Debra Barreto, Deputy Director – Customer Relations	
How members of the public can submit language access complaints/questions/requests: Members of the public can submit via the New York City Customer Service Center at 311, or customerservice@dssny.nyc.gov	
Number of complaints received: 1	Number of requests received: 0
How complaints were handled: After review, it was determined that the issue was non-LEP related.	How requests were handled: N/A
Agency Name: Department of Social Services (DSS)/Department of Homeless Services (DHS)	
Language Access Coordinator: Marah Rhoades, Deputy Commissioner, Office of Advocacy and Outreach	

<p>How members of the public can submit language access complaints/questions/requests: Members of the public can submit comments, including language access complaints, comments and questions by contacting: Shelter/Intake Directors or program leaders, the Office of the Ombudsman, 311, or “Contact Us” at nyc.gov/dhs</p>	
<p>Number of complaints received: 7</p> <p>How complaints were handled: Complaints made to 311 regarding language services at DHS are referred to the Agency’s Equal Opportunity Affairs (EOA) Office. A staff member in that office reviews the complaint and, if appropriate, reaches out to the complainant. The EOA office investigates the complaint internally and addresses the issue with program leadership, staff members and/or providers. When required, the EOA office reminds both program areas and/or providers of the Agency’s language access commitment, tools and requirements and works with them to address any unmet needs.</p>	<p>Number of requests received: 0</p> <p>How requests were handled: All DHS locations and staff have access to telephonic interpretation services 24 hours a day/7 days a week/365 days a year. As a result, there is no need to request language services in advance via 311. Callers should simply be directed to any of the Agency’s locations to request immediate language services.</p>
<p>Agency Name: Department of Social Services (DSS)/ Human Resources Administration (HRA)</p>	
<p>Language Access Coordinator: Marah Rhoades, Deputy Commissioner, Office of Advocacy and Outreach</p>	
<p>How members of the public can submit language access complaints/questions/requests: Members of the public can submit comments, including language access complaints, comments and questions by contacting: Center Directors or program leaders, Infoline (718-557-1399), 311, or “Contact Us” at nyc.gov/hra.</p>	
<p>Number of complaints received: 15</p> <p>How complaints were handled: DSS’s Office of Constituent Services tracks any language access complaints received by the Agency, 311, nyc.gov and/or elected officials. Calls are summarized by agents and emails uploaded directly into the Agency’s Internet Quorum (IQ) program. Any complaints that include a language component are forwarded to the Office of Refugee and Immigrant Affairs (ORIA) or to ORIA and a specific program area for resolution. If a complaint is 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 case issues are involved as well, ORIA works with the appropriate program to ensure that both case issues and language access concerns are addressed.</p>	<p>Number of requests received: 0</p> <p>How requests were handled: All HRA locations and staff have access to telephonic interpretation services 24 hours a day/7 days a week/365 days a year. As a result, there is no need to request language services in advance via 311. Callers should simply be directed to any of the Agency’s locations to request immediate language services.</p>

Agency Name: Department of Transportation (DOT)	
Language Access Coordinator: Eleanor DiPalma, Executive Director – Customer Service	
How members of the public can submit language access complaints/questions/requests: Members of the public who have a complaint, question or request regarding language services are advised to contact 311 or speak to a DOT manager or supervisor.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Department of Veterans’ Services (DVS)	
Language Access Coordinator: Alexis Wichowski, Press Secretary & Senior Advisor for Communications	
How members of the public can submit language access complaints/questions/requests: Members of the public can use an online form on the agency’s webpage under “Contact Us” or “Send a message to Commissioner Sutton;” via e-mail: press@veterans.nyc.gov ; in-person: 1 Centre Street, 22nd Floor, Suite 2208, New York, NY 10007; via Tweet or Direct Message: @nycveterans, or Comment or Send Message nycveterans.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Emergency Management (NYCEM)	
Language Access Coordinator: Christina Farrell, Deputy Commissioner of External Affairs	
How members of the public can submit language access complaints/questions/requests: Members of the public can call 311 or email languageaccess@oem.nyc.gov	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Fire Department (FDNY)	
Language Access Coordinator: Steve Ertrachter, Executive Director of Licensing	
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.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Landmarks Preservation Commission (LPC)	
Language Access Coordinator: Zodet Negrón, Director of Communication	
How members of the public can submit language access complaints/questions/requests: A member of the public can submit via 311 and routed to MOIA. LPC plans to add a complaint form on its website.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: New York City Law Department (Law)	
Language Access Coordinator: Sosimo Fabian, Chief Diversity & EEO Officer	
How members of the public can submit language access complaints/questions/requests: Members of	

the public can submit language access complaints via email, phone or 311.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: New York Police Department (NYPD)	
Language Access Coordinator: Inspector John G. Cappelmann, Commanding Officer, Office of Management Analysis & Planning	
How members of the public can submit language access complaints/questions/requests: Members of the public may submit language access complaints via phone (recorded or anonymous line); regular mail; email; by visiting a precinct; or calling 311.	
Number of complaints received: 12	Number of requests received: 0
How complaints were handled: Complaints are assigned to the Patrol Borough Investigation Unit or Chief of Department Investigative Review Section as appropriate.	How requests were handled: N/A
Agency Name: Office of Administrative Trials and Hearings (OATH)	
Language Access Coordinator: Marisa Senigo, Assistant Commissioner—Public Affairs & Communications	
How members of the public can submit language access complaints/questions/requests: Members of the public can call 311 to issue a complaint. There are signs in OATH waiting rooms advising of this right. In addition, one can visit the OATH website and email the Commissioner and Chief Administrative Law Judge using the online form. That form's dropdowns are all routed to Assistant Commissioner for Public Affairs, who is also the agency's Language Access Coordinator. This ensures that the Language Access Coordinator will receive the email, even if the user does not choose the <i>Language Access Inquiry/Complaint</i> option on the drop down.	
Number of complaints received: 1	Number of requests received: 0
How complaints were handled: The complaint claimed that the translator at a hearing did not translate what was being said. Since all hearings are recorded, OATH sent via email the complaint to the vendor, Language Line, along with the copy of the digital recording of the hearing. Manager at the vendor reviewed and confirmed that the vendor did make the correct translation of the hearing and that the complaint was unsubstantiated.	How requests were handled: N/A
Agency Name: Office to Combat Domestic Violence (OCDV)/ Mayor's Office to Combat Domestic Violence (MOCDV)	
Language Access Coordinator: Saloni Sethi, Deputy Director of Policy and Training	
How members of the public can submit language access complaints/questions/requests: A member of the public can call 311 or email OCDVLanguageAccess@cityhall.nyc.gov	
Number of complaints received: 0	Number of requests received: 0

How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Small Business Services (SBS)	
Language Access Coordinator: Michael Silver, Senior Policy Advisor	
How members of the public can submit language access complaints/questions/requests: Members of the public can call 311, use the “contact us” portal though the SBS and NYC Business websites, or through contracted vendors.	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A
Agency Name: Taxi and Limousine Commission (TLC)	
Language Access Coordinator: Malcolm Cain Jr., Deputy Director of External Affairs	
How members of the public can submit language access complaints/questions/requests: A member of the public can ca 311, TLC's Call Center at 718-391-5501, or email TLC directly at tlcexternalaffairs@tlc.nyc.gov	
Number of complaints received: 0	Number of requests received: 0
How complaints were handled: N/A	How requests were handled: N/A

Outreach Efforts

Local Law 30 requires that the Office of the Language Services Coordinator (OLSC), in consultation with MOIA, perform outreach in neighborhoods with a significant number of people who do not speak LL30's ten designated citywide languages in order to understand the needs of these language groups.

This section provides context for the ongoing work that MOIA does to engage with immigrant communities across New York – and, as the lead for the OLSC, to disseminate critical information and to better understand community needs, including language access for City services.

Outreach to immigrant communities, including newly arrived and hard-to-reach communities, has been a critical focus of MOIA's work throughout the de Blasio Administration. Working closely with community partners and City agencies, MOIA's outreach and community services teams use multiple channels to provide information to the public about City services, policies that impact immigrants in New York, and other resources. MOIA hosted or participated in approximately 1,400 events in 2017, supported by additional strategic engagement like tabling, canvassing, presentations, and one-on-one stakeholder meetings. MOIA also held a total of 945 Know Your Rights forums in 2017 to inform immigrant communities about their legal rights and how to access City resources.

Much of the outreach includes engagement with residents with Limited English Proficiency (LEP) who do not speak one of the ten designated Citywide languages. These efforts include a series of innovative multilingual Town Hall forums, which represent a commitment on the part of the City to identify new areas for engagement and to bring a growing list of immigrant communities into the civic process. Each Town Hall is developed and implemented in close partnership with local leaders and organizers and tailored to the unique needs of each community.

- In 2015, MOIA held the city's first African Community Town Hall, bringing more than 300 residents – including speakers of Hausa, Twi, Bambara, and Fon – together with City agency representatives, local officials, and service providers. The event marked the beginning of a sustained commitment to serving African communities in the Bronx. The IDNYC pop-up program has returned to the borough more than a dozen times since the Town Hall, including to Sauti Yetu Center for African Women and the Muslim Women's Institute for Research and Development. In February 2017, MOIA organized a follow-up African Town Hall to address the African immigrant communities' concerns following the new federal administration's executive orders and hostile rhetoric towards immigrants.
- In 2016, MOIA organized a Town Hall serving Himalayan communities in Queens in partnership with the Mayor's Community Affairs Unit (CAU). The event was conducted in Tibetan and Nepali and brought together Sherpa, Mustang, Tibetan, Nepali, Bhutanese and other Himalayan groups with City agency representatives, including from the Taxi-Limousine Commission, Department for the Aging (DFTA), and the City Commission on Human Rights (CCHR). Follow up included an IDNYC pop-up location at the United Sherpa Association (with the unveiling of new Tibetan translations of IDNYC applications) and at Adhikaar and forums with the Ridgewood Nepalese Society.
- In December 2017, MOIA organized the city's first Afghan Community Town Hall, conducted in Dari and Pashto. More than 200 residents shared a broad range of concerns regarding housing, legal services, ESL classes, and more with representatives from MOIA, CCHR, CAU, the Department of Consumer Affairs, Small Business Services, DFTA, and many other agencies and community partners, most notably Women for Afghan Women. MOIA is currently working with these agencies to systematically respond to the concerns raised at the Town Hall.

- In April 2018, MOIA worked with communities in the South Bronx to implement a Garifuna and Central American Town Hall, a first for the City. In keeping with our mission to engage and empower immigrant communities citywide, MOIA worked closely with a coalition of Garifuna and Central American organizations and faith leaders in the South Bronx to collectively plan the event. The trilingual Garifuna/English/Spanish language forum brought over 250 community members together with representatives from city agencies and organizations including MOIA, CCHR, CAU, SBS, DYCD and Catholic Charities. Participants attended breakout sessions discussing housing, jobs, youth development, senior services and immigration. There was also a celebration of Garifuna culture including a poster contest, art, music, and a dance performance.

In addition to brokering engagement with City agencies as part of its work on outreach and immigrant inclusion, MOIA engages with communities to celebrate linguistic heritage and diversity. On February 21, 2018, MOIA convened its third annual International Mother Language Day event, bringing representatives from linguistic minorities including speakers of Bengali, Nepali, Tibetan, Mustang, Sherpa, Bhutanese, Hindi, Persian, Arabic, Urdu, Spanish, Quichua, Haitian Creole, Punjabi, Tagalog, Mandarin, Cantonese, and Korean.

Over the course of the coming year, MOIA will continue to build on its work with community leaders and community-based organizations that serve immigrants who speak languages beyond the ten LL30 languages. MOIA is focusing on engaging with community leaders that serve Nepali, Punjabi, Albanian, Uzbek, and Yoruba speakers. Utilizing a broad range of outreach strategies, MOIA will continue to assess and analyze the needs of these and other language groups and discuss findings with relevant agencies to improve access to services.



List of designated citywide languages & data source

Nisha Agarwal
Commissioner

Memorandum

253 Broadway
14th Floor
New York, NY 10007

212-788-7654 tel
212-788-9389 fax

www.nyc.gov/immigrants

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

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."¹

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.

¹ 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).² 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 2017.³ The top six LEP languages are:

1. Spanish
2. Chinese*⁴
3. Russian
4. Bengali
5. Haitian Creole⁵
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

² 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>

³ 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

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

⁵ 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.⁶
- 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.⁷ The selection

⁶ 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>

⁷ 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

New York City, 2011-15			
		Total	Percent
	Total LEP	1,817,339	100.0
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
		1,817,339	100.0	
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

Data source used to determine the designated citywide languages

**Citywide Count of Parents by Preferred Written/Spoken Language
Parents of Students in Districts 1-32 and 75***

Language	2016-17		2015-16		2014-15		2013-14		2012-13		2011-12	
	Written	Spoken	Written	Spoken	Written	Spoken	Written	Spoken	Written	Spoken	Written	Spoken
(AMERICAN) SIGN LANGUAGE	122	354	143	394	156	422	182	463	204	479	209	451
ACHOLI	NULL	3	NULL	5	1	4	1	4	1	3	1	2
ADANGME	9	27	9	22	8	14	7	13	7	10	7	12
AFRIKAANS	259	278	297	313	332	349	369	383	402	414	431	448
AKAN	26	32	32	40	44	52	58	61	55	59	57	58
ALBANIAN	2836	2976	2990	3139	3180	3324	3361	3518	3619	3774	3856	4012
AMHARIC (AKA ETHIOPIAN)	45	47	42	47	48	48	49	49	48	46	45	46
AMOY (A.K.A.FUKIENESE)	NULL	482	NULL	599	NULL	716	NULL	828	NULL	868	NULL	949
ARABIC	17465	17658	15999	16187	14496	14706	13909	14100	13486	13625	12839	12985
ARAUCANIAN	26	62	27	61	25	55	31	57	34	44	34	38
ARAWAK	2	2	1	1	2	2	4	3	3	2	3	2
ARMENIAN	129	133	130	132	136	140	133	137	170	175	193	196
ASSAMESE	2	7	2	6	2	6	3	6	4	7	4	7
AYMARA	1	1	1	NULL	1	NULL	2	NULL	3	NULL	3	NULL
AZERBAIJANI (AKA AZERI)	27	30	22	23	18	18	16	16	15	16	12	13
BALANTE	36	40	38	42	40	43	40	43	44	47	48	50
BALINESE	2	2	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
BALUCHI	8	9	8	9	7	8	5	6	2	3	4	3
BAMBARA	142	157	155	170	148	160	155	169	161	168	147	160
BASQUE	NULL	1	1	2	1	2	1	2	1	2	1	1
BASSA	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	1	NULL	1	1
BELORUSSIAN	46	49	51	54	44	47	55	57	47	48	57	57
BEMBA	10	7	10	7	10	7	11	9	12	9	12	9
BENGALI (BANGLA IN BANGLADESH)	25608	26909	25653	26889	25091	26291	24837	25981	24107	25148	23140	24027
BHILI	9	15	10	16	10	16	11	18	12	17	11	15
BIHARI	23	23	29	29	35	35	34	34	33	33	33	35
BRAHUI	3	6	4	7	2	5	2	5	2	5	1	3

BRETON	2	1	2	1	2	1	2	1	1	1	2	1
BULGARIAN	72	76	74	76	84	87	82	86	84	87	105	109
BURMESE	197	205	214	222	219	228	226	236	229	240	258	273
BUSHMAN	6	9	6	8	6	9	5	9	3	7	5	10
CANTONESE	NULL	7061	NULL	7811	NULL	8505	NULL	9187	NULL	9729	NULL	10743
CATALAN	5	6	8	9	8	9	10	10	10	10	10	10
CEBUANO	26	21	21	17	21	16	14	15	16	18	16	18
CHAM	49	83	58	115	65	125	75	140	77	138	101	162
CHECHEN	9	5	9	4	8	3	7	2	5	2	5	2
CHINESE ,ANY	94992	66377	94870	65580	93503	64473	92808	63830	91426	62974	89175	60993
CHUUKES (TRUKES)	1	1	1	1	1	1	1	1	1	1	1	1
CROATIAN	106	112	114	120	131	136	145	148	155	158	155	161
CZECH	20	22	18	20	23	25	27	31	33	37	35	39
DAGOMBA	2	2	2	2	2	2	2	2	2	2	2	2
DANISH	21	22	21	21	12	12	10	10	8	8	7	7
DARI/FARSI/PERSIAN	271	295	287	309	326	345	364	377	388	404	425	448
DUTCH	55	60	59	63	71	76	69	74	77	82	75	78
DZONGKHA	10	10	11	12	8	8	5	5	4	4	4	4
ENGLISH	1E+06	992034	1053455	1E+06	1085859	1E+06	1109813	1E+06	1E+06	1E+06	1167573	1E+06
ESTONIAN	85	62	93	63	98	71	109	86	104	94	113	106
EWE	44	53	40	49	36	45	41	49	38	48	38	48
FANTI (AKA FANTE)	10	13	9	12	11	13	18	19	19	24	22	29
FINNISH	8	10	7	9	9	11	11	14	6	9	5	10
FLEMISH	4	5	4	5	4	5	5	6	5	6	6	7
FON	6	8	6	8	7	9	6	9	5	8	5	6
FRENCH	4023	3974	4189	4148	4314	4235	4384	4287	4347	4264	4360	4292
FULANI	848	986	915	1073	959	1125	994	1175	1007	1178	982	1121
GA	29	32	31	35	32	35	30	29	34	34	30	32
GALICIAN	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	1
GALLA	NULL	1	NULL	2	NULL	3	NULL	2	NULL	1	NULL	1
GARIFUNA	1	3	1	2	1	2	2	3	2	2	1	1
GEORGIAN	327	337	279	287	241	249	227	232	235	238	229	236
GERMAN	130	139	124	133	146	155	141	155	129	139	125	139
GREBO	2	2	2	2	2	4	2	4	NULL	2	NULL	2
GREEK	331	357	357	389	384	405	408	429	394	414	417	447

GUARANI	16	17	18	18	20	20	29	27	31	31	35	35
GUJARATI	357	380	382	403	408	421	423	435	456	467	507	528
GURMA	5	4	5	4	5	3	4	2	6	5	7	6
HAITIAN CREOLE	5710	6251	5803	6371	6150	6695	6546	7065	6704	7192	6827	7282
HAUSA	142	157	144	162	138	157	131	148	115	130	114	130
HEBREW	283	301	299	321	334	348	357	376	361	380	411	459
HINDI	943	1002	993	1057	1014	1079	1061	1133	1114	1182	1222	1290
HMONG	1	NULL	1	NULL	1	NULL	1	NULL	1	NULL	NULL	NULL
HOTTENTOT	1	1	1	1	1	1	1	1	3	2	3	2
HUNGARIAN	123	128	125	130	131	133	129	131	122	125	106	109
IBO	24	28	30	32	27	30	34	39	34	39	44	49
ICELANDIC	3	3	1	1	1	2	1	2	7	8	7	7
ILOCANO	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
INDONESIAN (AKA BAHASA)	268	268	299	306	314	325	344	353	360	373	403	418
IRISH (GAELIC)	NULL	1	1	2	1	2	1	2	2	5	3	5
ITALIAN	540	575	513	540	461	482	410	445	387	428	430	473
JAMAICAN-CREOLE	27	31	27	31	28	36	31	40	32	39	34	41
JAPANESE	560	589	604	641	593	627	584	610	561	591	529	556
JONKHA	NULL	3	NULL	3	NULL	3	1	3	1	4	2	4
KABRE	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
KACHI	2	2	NULL	NULL	NULL	NULL	NULL	NULL	1	1	2	2
KAFIRI	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
KAMBA	NULL	NULL	4	4	5	5	5	5	5	5	4	4
KANARESE (A.K.A. KANNADA)	2	4	2	4	2	4	2	4	5	7	5	7
KANNADA	2	2	2	2	3	3	3	3	2	2	2	2
KANURI	5	5	6	4	7	5	8	7	12	11	10	9
KAREN	6	7	6	8	4	6	4	6	13	15	18	21
KASHMIRI	2	2	3	3	2	2	1	1	1	1	1	1
KAZAKH	4	4	5	5	2	2	1	1	2	2	4	4
KHMER (AKA CAMBOGE)	41	40	45	44	52	48	66	60	84	78	90	84
KHOWAN	1	1	1	1	1	1	1	1	NULL	NULL	NULL	NULL
KIKUYU	NULL	NULL	1	1	1	1	1	1	1	1	1	1
KONGO	11	10	11	10	11	10	10	10	10	10	10	10
KOREAN	5046	5190	5592	5739	6095	6223	6661	6781	7120	7285	7735	7980
KPELLE	2	3	2	3	2	2	2	2	2	2	2	2

KRU	NULL	1	NULL	1	NULL	1	NULL	1	NULL	1	NULL	1
KURDISH	NULL	2	1	3	1	2	2	3	2	3	2	3
LAO	7	7	8	8	8	8	6	6	5	5	7	7
LATVIAN	5	6	2	2	6	7	8	9	10	11	9	12
LINGALA	1	1	1	1	1	1	1	1	NULL	NULL	NULL	NULL
LITHUANIAN	20	20	20	19	23	22	26	25	29	26	31	28
LOMA	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
LUBA	1	1	1	1	1	1	1	1	1	1	1	1
LUGANDA	2	1	2	1	1	NULL	NULL	NULL	NULL	NULL	1	1
LUNYANKOLE	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
LUO	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	1	2
MACEDONIAN	80	102	79	117	89	135	102	150	111	160	115	164
MALAGASY	12	12	11	11	8	8	7	8	5	6	9	10
MALAY	15	16	20	21	24	27	28	33	28	34	30	36
MALAYALAM	145	167	163	207	180	225	210	259	241	289	267	320
MALINKE	34	33	33	30	32	30	40	39	42	42	46	44
MALTESE	6	7	5	6	5	6	6	7	6	7	6	7
MANDARIN	NULL	22172	NULL	22006	NULL	20957	NULL	20118	NULL	18991	NULL	17816
MANDINKA (AKA MANDINGO)	488	516	538	570	582	631	585	638	595	645	585	637
MARATHI	10	11	10	10	5	5	5	5	5	5	8	8
MENDE	1	2	NULL	1	NULL	1	NULL	1	2	3	3	3
MOHAWK	1	NULL	1	NULL	1	NULL	1	NULL	1	NULL	NULL	NULL
MOLDAVIAN	48	69	46	69	46	69	46	69	38	63	36	62
MONGOLIAN	7	9	9	11	10	11	10	13	14	16	13	14
MOSSI (AKA MORE)	76	121	82	121	91	136	100	130	101	132	86	116
NAHUATL	241	235	219	215	206	204	211	208	216	213	211	207
NDEBELE	10	11	13	14	13	14	12	13	9	10	11	12
NEPALI	886	923	844	882	850	885	813	847	813	848	810	840
NORWEGIAN	2	2	3	3	2	2	2	3	2	2	7	7
NYANJA (A.K.A CHINYANJA)	5	6	5	6	6	6	3	3	3	3	3	2
ONEIDA	63	80	76	86	85	87	101	97	107	93	123	104
ORIYA	NULL	2	NULL	1	1	2	1	2	1	2	1	2
OSSETIAN	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
PAPIAMENTO	6	5	6	5	5	4	6	7	7	8	5	6
PASHTO (A.K.A. PUSHTO)	434	457	455	484	468	493	487	513	531	562	530	569

PILIPINO (A.K.A. TAGALOG)	556	578	627	657	708	744	777	820	870	916	937	991
POLISH	3009	3090	3243	3329	3586	3701	3864	3992	4016	4142	4208	4357
PORTUGUESE	471	486	465	478	478	489	481	496	532	550	590	607
PROVENCAL	2	2	2	2	2	2	2	2	3	3	2	2
PUNJABI (A.K.A. PANJABI)	2908	3181	3009	3293	3109	3393	3182	3443	3263	3501	3362	3613
QUECHUA	4	4	4	4	4	4	4	4	3	3	1	1
QUICHE	6	5	4	4	4	4	NULL	2	NULL	NULL	NULL	NULL
RAJASTHANI	2	2	1	2	1	2	1	2	1	2	1	3
ROMANIAN	189	205	202	220	190	204	192	206	206	219	238	261
ROMANSCH	1	1	3	3	3	3	3	3	3	3	3	3
RUNDI	2	2	2	2	2	2	2	2	2	1	2	1
RUSSIAN	14595	15189	14327	14994	13861	14503	13417	14033	12975	13595	13011	13672
RWANDA	1	2	1	2	2	3	2	3	4	5	3	5
SAMOAN	5	6	6	7	6	8	8	10	9	12	13	16
SANSKRIT	8	9	9	10	7	9	7	9	8	11	8	11
SCOTTISH-GAELIC	NULL	NULL	NULL	NULL	1	1	2	2	3	3	3	3
SENECA	7	6	7	5	10	8	16	13	16	13	22	19
SENUFO	226	232	258	265	275	282	302	314	321	335	359	376
SERBIAN	88	100	95	109	95	108	103	114	89	101	89	101
SERER	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
SERI	5	5	5	6	4	5	6	8	5	7	9	9
SESO THO	1	1	1	1	3	3	4	4	4	4	4	4
SETSWANA	7	9	8	8	9	9	11	10	12	12	12	13
SHAN	6	5	8	7	5	5	5	4	3	2	3	2
SHINA	1	1	1	1	3	3	2	2	2	2	1	1
SHLUH	10	8	12	10	10	8	10	8	10	8	13	11
SIDAMO	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
SINDHI	6	5	6	6	13	14	12	13	18	21	23	24
SINHALESE	76	93	86	104	101	116	104	120	130	146	134	151
SLOVAK	166	228	185	243	212	258	216	256	236	263	270	295
SLOVENIAN	19	19	22	23	25	26	29	30	30	33	26	30
SOMALI	3	3	3	3	4	4	6	6	8	8	10	10
SONINKE	623	653	651	668	659	683	635	659	660	677	641	662
SPANISH	326255	329625	335274	338532	340802	343962	341469	344531	343689	346747	346388	349557
STUDENT DOES NOT SPEAK	19	22	25	25	43	40	53	50	58	55	70	66

SUDANESE	11	11	11	11	6	6	8	8	8	8	7	7
SUKUMA	10	11	12	13	12	13	13	14	17	18	19	20
SWAHILI (AKA KISWAHILI)	10	12	11	13	9	11	9	9	11	11	11	11
SWAZI	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	1	1
SWEDISH	35	35	40	39	36	34	37	34	25	26	22	22
TADZHIK (AKA TAJIK)	351	378	293	310	224	235	168	178	133	140	84	90
TAMASHEQ	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
TAMAZIGHT	2	1	1	1	1	1	1	1	1	1	1	1
TAMIL	116	134	135	152	142	160	136	154	161	177	172	189
TELUGU	29	37	34	45	44	54	46	55	53	61	62	69
TEMNE	9	6	11	8	10	7	10	7	9	6	9	6
THAI	169	167	179	179	202	207	211	216	229	234	237	244
TIBETAN	605	640	675	699	766	792	812	835	844	870	843	860
TIGRE	28	30	31	33	35	37	40	43	44	47	46	49
TIGRINYA	9	11	10	12	11	13	13	15	10	13	6	10
TONGA	4	6	6	7	7	7	9	9	10	10	7	7
TURKISH	429	451	475	492	484	507	513	530	551	570	616	641
TURKMEN	11	12	15	16	13	14	13	14	13	14	13	14
TWI	298	331	302	335	324	359	347	374	348	373	337	358
UKRAINIAN	947	1010	979	1050	1042	1106	1047	1118	1052	1129	1093	1171
UNKNOWN	177	197	218	248	269	306	365	410	635	718	1082	1212
URDU	8989	9678	9197	9918	9381	10095	9470	10135	9570	10196	9788	10373
UZBEK	1759	1811	1569	1605	1397	1430	1202	1230	1033	1052	857	865
VIETNAMESE	650	654	726	733	769	777	836	846	845	858	860	880
VISAYAK (A.K.A. BISAYA)	7	8	3	4	3	3	3	3	7	7	9	11
WELSH	NULL	NULL	NULL	NULL	NULL	NULL	1	NULL	NULL	NULL	NULL	2
WOLOF	316	332	318	335	327	353	324	347	330	360	296	325
YIDDISH	165	194	119	166	130	219	70	133	172	227	363	415
YORUBA	85	106	85	106	93	108	105	126	104	120	117	139
ZULU	1	1	2	2	1	1	1	1	1	2	5	6

*Includes all parents who had a student active at any point during the school year

Language Access Implementation Plans

List of Agencies

311 (DOITT)
Administration for Children's Services (ACS)
Civilian Complaint Review Board (CCRB)
Commission on Human Rights (CCHR)
Department for the Aging (DFTA)
Department of Buildings (DOB)
Department of City Planning (DCP)
Department of Citywide Administrative Services (DCAS)
Department of Consumer Affairs (DCA)
Department of Corrections (DOC)
Department of Design and Construction (DDC)
Department of Environmental Protection (DEP)
Department of Finance (DOF)
Department of Health and Mental Hygiene (DOHMH)
Department of Housing Preservation and Development (HPD)
Department of Parks and Recreation (DPR)
Department of Probation (DOP)
Department of Records (DORIS)
Department of Sanitation (DSNY)
Department of Social Services/Department of Homeless Services (DSS/DHS)
Department of Social Services/Human Resources Administration (DSS/HRA)
Department of Transportation (DOT)
Department of Veterans' Services (DVS)
Emergency Management (NYCEM)
Fire Department (FDNY)
Landmarks Preservation Commission (LPC)
New York City Law Department (Law)
New York Police Department (NYPD)
Office of Administrative Trials and Hearings (OATH)
Office to Combat Domestic Violence (OCDV)
Small Business Services (SBS)
Taxi and Limousine Commission (TLC)



New York City 311 Customer Service Center



Language Access Plan

Language Access Coordinator: Michael Hutchinson, Finance and Contracts Director

I. Agency Mission and Background

The 311 Customer Service Center became operational in March 2003. The mission of 311 is to provide the public with quick, easy access to all New York City government services and information while maintaining the highest possible level of customer service. The 311 Customer Service Center is the primary vehicle used by residents, businesses and visitors to New York City, to obtain non-emergency government services and information throughout the 5 boroughs. By dialing one easy to remember telephone number, a caller can obtain information for over 4,000 services. Calls to 311 are answered 24 hours a day, 7 days per week, and 365 days a year. Call taking services include providing information, processing service requests for various City agencies and taking complaints from callers with respect to City services, as well as, referrals to certain City, State and Federal government agencies.

City agencies for which 311 takes service requests include, but are not limited to: Department of Buildings; Department of Sanitation; Department of Housing, Preservation and Development; Department of Environmental Protection; Department of Transportation; Department of Parks and Recreation; Department of Education; Police Department (Quality of Life); Department of Health and Mental Hygiene; Taxi and Limousine Commission.

311 assists agencies to improve service delivery by allowing them to focus on their core missions and manage their workload efficiently.

We also provide insight into ways to improve City government through accurate, consistent measurement and analysis of service delivery Citywide.

II. Agency Language Access Policy and Goals

311 has been providing telephonic interpretation services and translation services as required in over 175 languages prior to Executive Order 120 in 2008 and Local Law 30 in 2017. All services provided by the 311 Customer Service Center is available to LEP individuals that contact 311, regardless of language spoken. 311 is committed to working with elected officials and members of the public, to improve service delivery to individuals with limited English proficiency.

In 2013 the Department of Citywide Administration (DCAS) contracted with language services vendors including Language Line Solutions and Geneva Worldwide for over the phone interpretation and language translation services. 311 currently uses both vendors for the respective services listed above. The DCAS master contract is designed



New York City 311 Customer Service Center



to permit all City agencies to establish a Task Order under the umbrella of the contract. Not only does this alleviate other agencies from having to undergo the arduous and costly Request for Proposal (RFP) process, other agencies will benefit by economies of scale offered by the contract.

311 is committed to improving the customer experience for all citizens that contact the call center. As such, we inform our customers of the availability of interpretation services via our IVR messaging and the connect times to an interpreter are tied to service level agreements in our contracts with our service providers. Providing non English callers with the option to speak in their native language or a language they are most comfortable speaking, encourages them to contact 311 for assistance with obtaining government services or information. Reducing wait time for our customers to connect to an interpreter improves their overall experience and is a goal for 311.

III. LEP 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 requires agencies providing direct public and emergency public services to provide services in 10 languages. These languages were identified by the Mayor's Office of Immigrant Affairs based on an assessment of the US Census data from the Department of Education. The languages are Spanish, Russian, Chinese (Mandarin and Cantonese), Bengali, Haitian Creole, Korean, Arabic, French, Urdu, Polish. 311 has been providing telephonic and translation services since 2003 as required, in over 175 languages, including these languages. Monitoring of the frequency of use of these languages is performed routinely.

Factor 2 – LEP data tailored specifically to 311

311 obtains information from other agencies that assist us in determining peak language requirements in specific languages for targeted outreach programs. Over 94% of limited English proficient callers to 311 request interpretation services in Spanish, Mandarin, Russian and Cantonese. The remaining 6% are in other languages. All limited English proficient individuals, regardless of language are eligible for interpretation services. Providing non English callers with the option to speak in their native language or a language they are most comfortable speaking, encourages them to contact 311 for assistance with obtaining government services or information. During a call with a limited English speaking individual where interpretation services are engaged and it is determined that 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 operator authorizes 311 to disengage. During calendar year 2017, 311 received 20,141,764 calls, 639,521 calls required interpretation services.



New York City 311 Customer Service Center



Language line provided assistance on 193,295 of those calls in 93 different languages. Compared to calendar year 2007, Language Line has seen an increase of over 116,000 calls.

In addition to contracting with language services vendors for over the phone interpretation and written and recorded translation services, 311 employs customer service representatives who are able to converse with the callers in Spanish.

Language Line Solutions call volumes by Language are reviewed monthly by 311 and quarterly by MOIA to assess changes in the LEP population.

Factor 3 – Nature and Importance of Services

311 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 which include The Dept. of Health, Housing Preservation Department, Department of Transportation, Human Resources Administration, etc. Without access to an interpreter, individuals may not obtain the information they are seeking to make informed decisions regarding the eligibility for services offered by many City agencies.

Factor 4 – Resources available for Language Assistance

The 311 Customer Service Center provides various means for members of the public to obtain access to City services. Messages in languages other than English have been included in our upfront IVR messaging solution for all callers.

311 provides translation in over 100 languages on it's website, 311 online, via nyc.gov

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 also provides assistance in languages on these channels.

Translation of cultural signs are displayed in various languages to emphasize to our staff, Agency colleagues, and our visitors our ability to communicate with the public in multiple languages.

311 utilizes a telephonic language interpretation and a translation services vendor with annual costs in excess of \$1,000,000 to provide these services.



New York City 311 Customer Service Center



IV. Implementation: Plan Logistics

Document Translation Services:

The 311 Customer Service Center does not routinely require document translation services to fulfill its mission of providing information to the public. However, we have contracted with Geneva Worldwide to provide these services in any language when required. All translation requirements (voice recordings or document translations) are determined on a case by case basis. There are no essential documents that require translation at the 311 Customer Service Center. 311 does not routinely distribute documents to the public or the media, nor do we routinely place documents on the Language Gateway. Translation of cultural signs and photographs are displayed in the 311 Customer Service Center in various languages to emphasize to our staff, or Agency colleagues and our visitors (local and international invited delegations) our ability to communicate with the public in multiple languages. Geneva Worldwide is expected to adhere to the service level agreement for document translations and be accessible for rush translation requests in the event of an emergency.

Telephonic Interpretation Services:

It is the business model of 311 to provide interpretation services for all callers 24x7x365 daily since calendar year 2003. This service is currently available in over 200 languages (including the 10 languages covered by Local Law 30), via our telephonic interpretation vendor, Language Line and 311 employees. This represents an increase of 25 additional languages and dialects since 2003. 311 embarked on a plain language initiative in 2011. All content in our CRM system used by our call takers is now listed in plain language for ease of understanding for our customers.

Service level requirements are in place for vendors providing telephonic interpretation. It is the goal of 311 to ensure that the average time to have a telephonic interpreter in the four most commonly requested languages (Spanish, Cantonese, Mandarin, and Russian) is 30 seconds or less. 311 is mandated to answer 80% of all calls in 30 seconds. 311 also provide access to health and human services via its 211 dialing protocol in over 200 languages.

311 has a contingency plan that includes redundancy provided by an outsourced vendor. This provides for continuity of call taking services in the event of an emergency that includes uninterrupted language accessibility. 311 maintains its ability to continue operations despite natural disaster or other emergencies as part of its COOP (Continuity of Operations Plan).

A multi-lingual Interactive Voice Response System (IVR) interface was introduced in April 2008 and is currently being upgraded to enhance non English functionality. This



New York City 311 Customer Service Center



service provides callers 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” information in their native language. This is convenient to callers seeking this information and eliminates the need for an agent and or an interpreter. Callers do have the option of requesting assistance after listening to the recording in any of the other languages including the languages recently included by Local Law 30.

The 311 Customer Service Center completed 639,521 telephonic interpretation calls in calendar year 2017 which were comprised of 93 languages.

The center maintains an online channel (311 Online) via nyc.gov which includes the ability to translate all 311Online content offered in over 100 languages.

311 implemented a Text Messaging Channel for citizens to reach 311 at (311692) with plans to communicate in numerous languages, other than the current English and Spanish, in the future.

311 communicated in language other than English (Spanish) in our primary social media channel on a regular basis (Dominican Day Parade or Puerto Rican Day Parade, and provides topical information. Social media channels include Twitter and Facebook.

The 311 Customer Service Center has a Language Access Coordinator. The role of the coordinator includes the following:

- Coordinate over the phone interpretation and document translation services via approved vendors 311 has contracted and proactively manage the contractual relationship for interpretation and translation services.
- Coordinate effective and timely interpretation and translation service for service requests, complaints, and correspondence requiring translation.
- Document and report translation service requested and provided.
- Oversee the operational relationship with each interpretation and translation vendor.
- Collaborate with DCAS, and the DoITT Citywide contracts team related to the contract.
- Monitor service level agreements for each vendor.
- Manage all document translation requests.
- Support the training, quality assurance and operations teams at 311 for interpreter and translator related items.
- Routinely monitor calls for quality assurance purposes.
- Refers problems with service through the vendor’s Voice of the Customer Process (VOC)



New York City 311 Customer Service Center



- Interact with DoITT Telephony and IT personnel regarding technical problems encountered with Language Line Solutions and escalate to the vendor, if required, for resolution.

The Language Access coordinator will continue to monitor, maintain, and enhance, whenever possible, access to language services. 311 is fully prepared to provide telephonic interpretation and translation services during day to day operations, as well as, during emergencies.

V. Training

All frontline 311 staff are trained on providing language services as new hires.

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 Call Center Representatives (CCR's) are trained on how to interface with a caller who does not speak English or whose communication skills are limited in English.

CCR's 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.

Call Center Representatives are instructed on how to handle a call when they are unable to readily identify the caller's language.

CCR's utilize CTI (Computer Telephony Integration) which allows them to almost instantly connect to Language Line Solutions and conference an interpreter to the call.

CCR's are trained to speak to the caller through the interpreter so that the caller receives the same service as an English speaking caller would receive.

During new hire training 311 trainers review the prescribed tips for handling Language Line calls.

Internal bilingual Spanish staff at King Teleservices (a virtual offsite contact center utilized to support call volumes) must pass a language assessment test approved by the City to be qualified to handle Spanish 311 calls.

Our vendors employ professional interpreters with years of experience and highly qualified testers to administer an Interpreter Skills Assessment Test. Additionally, interpreters are assessed on their ability to speak clearly, remain neutral, maintain



New York City 311 Customer Service Center



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 (3) week orientation program and on-going training and coaching.

311 is an equal opportunity employer that is committed to federal, state and City EEO laws as well as the Citywide EEO policies and procedures.

During new hire training, as part of the customer service component, 311Call Center Representatives are trained to be sensitive to the caller's needs and how to professionally interact with someone who is Limited English Proficient.

311 personnel also received an EEO orientation class which addresses cultural diversity in the workplace when communicating with external customers.

Posters written in other languages are positioned throughout the 311 Contact Center to remind personnel about our sensitivity to the diverse population of callers to 311.

311 quality assurance staff monitors the calls to ensure that quality interpretation services are provided as per Executive Order 120, Local Law 30, and 311 policies daily. Customers contacting 311 are always advised of the availability of language assistance services.

VI. Record Keeping and Evaluation

All calls to 311 are recorded and all metrics related to language assistance services are readily accessible internally at 311 or via the vendor's portal.

The 311 Quality Assurance Team monitors recorded calls daily for all shifts. Bilingual quality assurance evaluators listen to Spanish calls and provide coaching and development to CCRs. 311 supervisory staff also evaluate and coach Spanish calls. In addition to Spanish, the Quality Assurance Team also evaluates calls handled in other languages to ensure that the English speaking 311 call taker and the interpreter are in synch with providing the caller with quality service.

Language Line Solutions similarly has a Quality Assurance Team that monitors live calls without the knowledge of the interpreter. A senior language specialist provides coaching and feedback and identifies training and developmental needs.

Language Line Solutions 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



New York City 311 Customer Service Center



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 liaison for review and escalation to the vendor.

Language Line provides monthly and quarterly reports via their portal which include the number of calls and duration of the calls at a granular level (individual calls) and for all calls combined. 311 also maintain metrics on the volume of calls handled by our bilingual employees.

a. Ensuring Compliance with Executive Order 120 and Local Law 30:

311 provides language access in over 200 languages and dialects. The following items ensure compliance with EO 120 and Local Law 30:

311 monitors call volume and consumer needs daily and monthly.

All calls, including those utilizing an interpreter are recorded and retained in accordance with 311's Privacy Policy.

The Quality Assurance team evaluates calls handled in other languages to measure the level of customer service.

Language Line Solutions call volumes by language are reviewed monthly by 311 and quarterly by MOIA to assess changes in the LEP population.

311 conducts routine reviews to determine the need to hire additional bilingual interpreters for other languages besides Spanish.

311 utilizes the vendor's Voice of the Customer process to assess the performance of the vendor's interpreters.

All vendors engaged to provide Language services have contractually agreed upon service level agreements to adhere to when providing services.

Obtaining feedback from Community Boards, Borough President's Offices and the Mayor's Office of Immigrant Affairs.

Feedback from callers which may result in process improvements or complaints filed as a result of language access problems.

Updating the Language Access Plan as required by the City.



New York City 311 Customer Service Center



VII. Resource Analysis and Planning

DCAS hosts the Master Agreement with all Language Service providers. Our current vendor for interpretation services, Language Line Solutions is considered an expert in the industry. Geneva Worldwide provides translation services as required and was selected by the City to do so via a competitive process.

311 and the virtual contact center (King TeleServices) continue to hire personnel who are bilingual in Spanish to ensure language accessibility in our most requested language.

The continued use of the Volunteer Language Bank to utilize City employees who are bilingual in any language for the purpose of proofreading documents which have been translated by the vendors is beneficial to the City. It has been discovered that New York City personnel are sometimes able to make alternate recommendations for translation, utilizing colloquialisms in the foreign language that might be more widely understood by the population of callers to NYC 311. Internal staff is also used to evaluate IVR recordings that are produced by the vendor using professional voice talents.

As the funding permits, the goal is to have all bilingual employees and volunteers certified through the Language Line Proficiency Testing processes.

VIII. Outreach and Public Awareness

The 311 Customer Service Center informs the public of language assistance services on its IVR platform, 311 Online on the web, Social Media and Text messaging channels. Translation of cultural signs and photographs are displayed in the 311 Customer Service Center in various languages to emphasize to our staff, our Agency colleagues, and our visitors (local and international invited delegations) our ability to communicate with the public in multiple languages. 311 does not customarily distribute written materials to members of the public.

IX. Language Access Complaints

The 311 Customer Service Center forwards all language access complaints, as well as, language access requests from our customers pertaining to the Agency concerned, if a contact has been established for those agencies. A copy of all complaints and requests received from customers is sent to the Language Access Complaint mailbox to the City's Language Access Coordinator at the Mayor's Office of Immigrant Affairs. All complaints and requests from customers will be tracked via our CRM (Customer Relationship Management) system and monitored by the 311 Language Access Coordinator. It is the responsibility of the Language Access Coordinator to see to the timely resolution of any complaints or requests from customers regarding 311



New York City 311 Customer Service Center



specifically. 311 reports the amount of complaints received in its Language Access Plan annually and will also report the number of “requests for language access” in that plan document.

X. Implementation Logistics

The Language Access Liaison for the 311 Customer Service Center is Michael Hutchinson, whose title is Contracts and Finance Director. 311 is language accessible in over 200 languages and has been language accessible since early 2003. 311 does not issue licenses or permits to its customers and unlike some agencies, does not have walk in centers for the public. 311 currently meets all requirements of Executive Order 120 and Local Law 30 and continues to maintain a plain language standard which has been implemented for several years. 311 will continue to review its policies to ensure we maintain compliance to the laws.

New York City
Administration for Children’s Services

*Language Access Implementation
Plan*

We Speak Your Language

April 30, 2018



MESSAGE FROM COMMISSIONER DAVID HANSELL

It is a privilege to live, work, and serve in a progressive, international, multicultural city like New York. At ACS, we take pride in our commitment to protect children and strengthen families without regard for national origin, legal status, or English language proficiency. We are grateful that our local and state governments have enacted policies requiring non-discriminatory public child welfare practice. Nothing less than children's lives and well-being are at stake.

Given the challenges presented by the current federal administration, however, ACS has increased our efforts to protect and support vulnerable immigrant and LEP populations. We believe these efforts are reflected in this 2018 Language Access Implementation Plan, which provides a detailed overview of our existing services and processes, our ongoing efforts to strengthen and expand services to LEP constituents, and our ambitious goals and aspirations.

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

David Hansell
Commissioner, NYC Children's Services

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Name and title of Language Access Coordinator: Eric Brettschneider, First Deputy Commissioner

I - Mission and Background

The Administration for Children’s Services (ACS) protects and promotes the safety and well-being of New York City’s children and families by providing **child welfare, juvenile justice, and early care and education services**.

- **Child welfare.** The continuum of child welfare services ranges from preventive services—free, confidential services such as family counseling, support groups, crisis interventions, public benefits access, domestic violence programs, and job skills development—to child protective and foster care services.
- **Juvenile justice.** ACS offers a spectrum of services for youth and their families at every stage of the juvenile justice process, including community-based supportive services; therapeutic interventions; detention services for youth in juvenile delinquency and offender proceedings or awaiting post-adjudication placement; and residential placement and aftercare services for youth who have been found by the Family Court to have committed a delinquent act.
- **Early care and education.** ACS administers the largest publicly-funded early care and education program in the United States, serving approximately 100,000 children, ages 6 weeks to 13 years old each year in center-based and family child care settings. Services are provided via contracts with community-based organizations and through child care vouchers.

II - Language Access Implementation Plan and Goals

The purpose of the ACS Language Access Implementation Plan is to ensure that language is not a barrier to children and families meaningfully engaging in any ACS program or service. ACS’ policy is to provide interpretation in over 200 languages and to translate “commonly distributed” documents (as defined in section IV) into 10 priority languages required by Local Law 30 (Spanish, Chinese, Bengali, Russian, Arabic, Urdu, Haitian Creole, Korean, Polish and French) for children and families in New York City who are limited English proficient (LEP).

We strive to provide LEP youth and families with meaningful access to all of the child welfare, juvenile justice, and early care and education programs and services provided by ACS and by our community-based contracted providers and to increase inclusion of LEP communities in policy and planning related to ACS programs and service delivery.

Specifically, our goals are to:

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

Goal One: Support public-facing staff who work with LEP clients

Meaningful and accurate communication between our staff and the children, young people, and families we serve is a cornerstone of successful outcomes across every aspect of our work. We strive to prevent language differences from undermining interventions that best address a client’s needs. To this end, we support public facing staff with the tools,

resources, and education they need to effectively bridge language barriers.

Goal Two: Collect, measure, and evaluate key data

Understanding the perspectives of those who have first-hand experience with ACS’s language access program—including public-facing staff, contracted providers, language services vendors, ACS clients, and client advocates—is a crucial part of our overall evaluation of the program. Feedback from these key stakeholders was sought in 2017, and the results will be utilized to deepen our understanding of how well the language access program meets the needs of those who depend on it. Language access policies and program decisions are informed by the best available quantitative data on community language needs and usage of existing language access services. In addition, we will continue to enhance our mechanisms to coordinate responses to individual, case-specific language access concerns.

Goal Three: Enhance community awareness and engagement

Our goal is to ensure that the youth, families, and communities ACS serves are aware of their right to free language services. Through a variety of outreach initiatives—such as our recent multifaceted, citywide media campaign and our community-based workshops—we are working to ensure that community members are aware of the full range of services available through ACS and our provider agencies and feel comfortable seeking the services that best meet their needs without fear of discrimination based on language or immigration status. As part of our effort to reach LEP communities, we look to increase our engagement with ethnic media and our partnerships with community-based organizations serving LEP youth and families.

Please see the ACS Language Access Implementation Plan logistics for these three goals in Section X.

III - LEP Population Assessment

Under Title VI of the Civil Rights Act of 1964, which protects individuals from discrimination on the basis of their race, color, or national origin, LEP individuals are entitled to meaningfully access federally assisted programs. In accordance with the Civil Rights Act, Executive Order 120 and Local Law 30, ACS utilizes the U.S. Department of Justice “Four-Factor Analysis” to determine which LEP populations our agency serves and how to provide these populations meaningful access to programs and services.¹ As outlined below, the Four-Factor Analysis accounts for the services we offer, the communities we serve, the resources we possess, and the costs of various language service options.

Because ACS provides a broad range of programs and services that may serve different

¹ U.S. Dept. of Justice, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 Fed. Reg. 41,455, 41,457 (June 18, 2002).

populations, each division within ACS completes its own annual four-factor analysis, and ACS produces an agency-wide four-factor analysis based on the division-specific analyses.

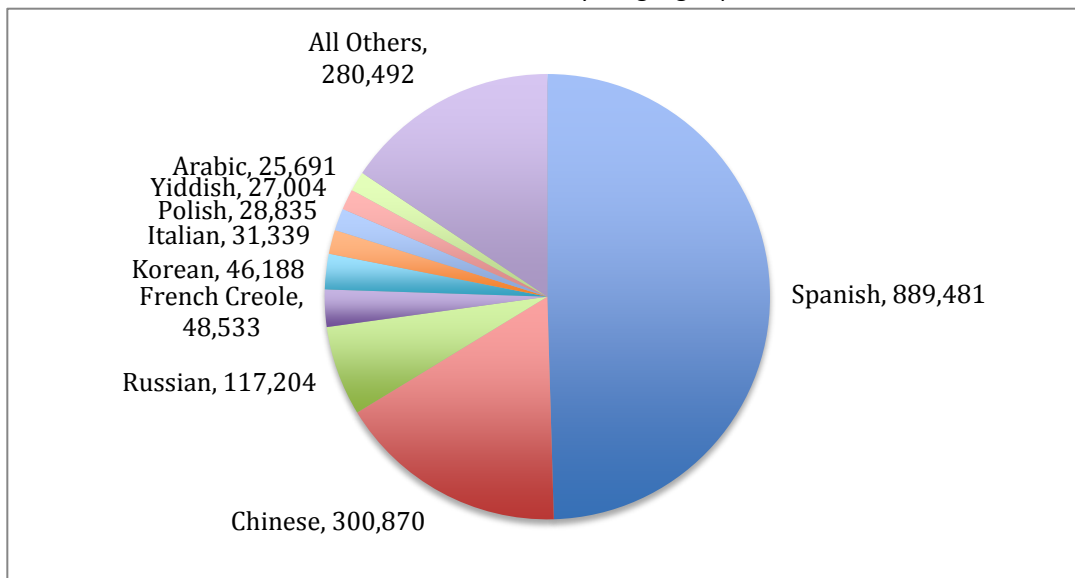
Based on the results of the agency-wide four-factor analysis, ACS provides free in-person or telephonic interpretation services to clients in all child welfare and Juvenile Justice matters. The Language Access Work Group coordinates resources to further expand interpretation services throughout our juvenile justice and early care and education programs. ACS will continue to translate essential public documents into the 10 priority languages (listed in section II). For ACS clients who speak other languages, oral interpretation of essential public documents will be provided.

Importantly, many of ACS’s services are provided through community-based agencies with ACS contracts. As recipients of federal funding, these agencies are also subject to the provisions of Title VI and must take reasonable steps to provide LEP individuals with meaningful access. We will continue to work collaboratively with all of our contracted providers so that language is not a barrier to meaningfully engaging in these programs and services.

Factor 1: Demographic Analysis

All of ACS’s child welfare, juvenile justice, early care, and education programs and services are available to New York City’s children, young people, and families regardless of the language they speak. According to the U.S. Census Bureau (2009-2013 5-Year American Community Survey), New York City residents who speak English less than “very well” are most likely to speak: Spanish, Chinese, Russian, French Creole, Korean, or Italian (see Figure 1).

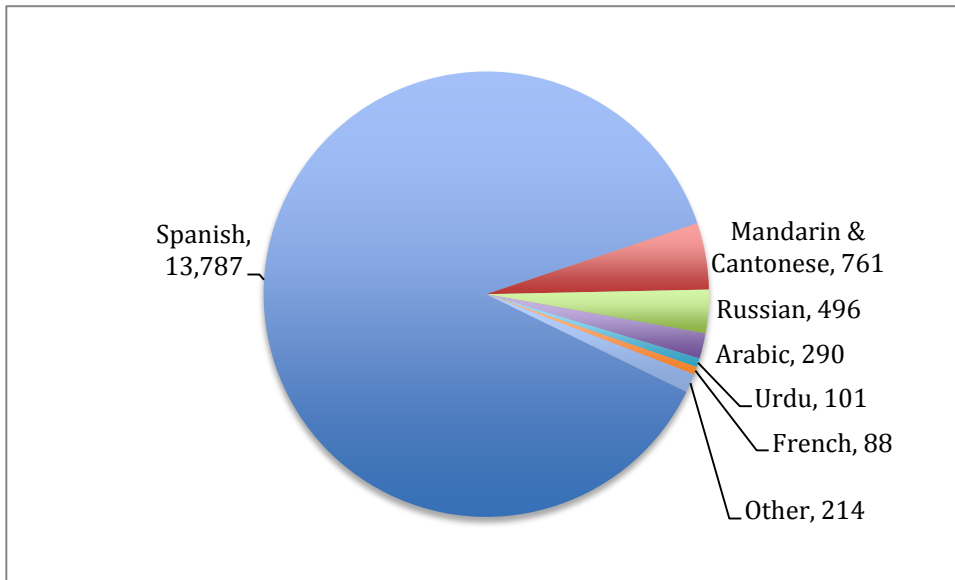
Number of LEP Individuals 5 Years and Older in NYC by Language Spoken at Home



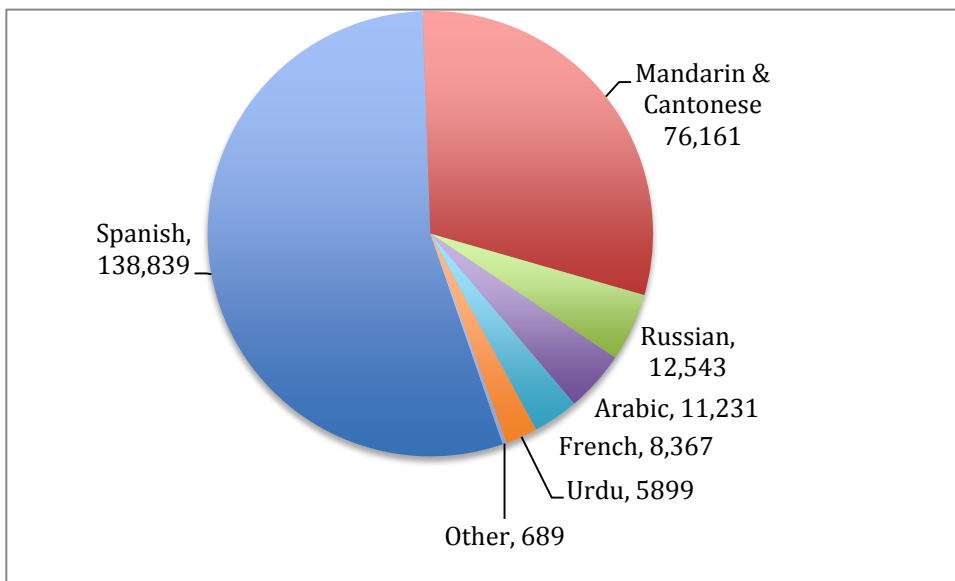
Factor 2: The Frequency by which LEP individuals come in contact with ACS

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

In-person interpretation: 15,737 during 2016-2017



Telephonic Interpretation: 253,729 during 2016 -2017



Factor 3: The importance of the benefit, service, information, and encounter to the LEP individuals

The Language Access Work Group systematically identifies which programs, services, or activities, if inaccessible to LEP individuals, have serious consequences. Across all ACS programs and services, clear, accurate communication between staff and clients is critical. ACS not only focuses on providing language access services for our full spectrum of child welfare programs but also seeks to transfer the best practices and lessons learned through that work to other divisions within ACS to create a coordinated system of language services across the agency.

Specifically, this Plan reflects ACS’ 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 youth and families have equal access to the services for which they are eligible, regardless of the level of their English proficiency;
- To inform all ACS clients 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: Resources available to the agency and the cost of providing various types of language services

Based on the above analysis, ACS has contracted vendors for in-person, telephonic, and sign language interpretation and document translation to provide meaningful language assistance services. ACS will translate commonly distributed documents into the 10 languages required by the law and most commonly used by the youth and families we serve: **Spanish, Chinese, Bengali, Russian, Arabic, Urdu, Haitian Creole, Korean, Polish, and French.**

Since the majority of our clients are Spanish language speakers, ACS has contracted vendors to provide on-site Spanish interpretation five days a week at 13 sites for four hours a day.

Type of Service	Vendor	2016-2017 FY Instances	2016- 2017 FY Expenditure
Telephonic Interpretation	Language Line Services	253,729 requests	\$549,713.11
In Person-On Site Spanish(13 DCP/FAP Offices)	Accurate Communications Inc.	3,484 requests	\$212,311.00
In Person Interpretation (excluding sign language)	Accurate Communications Inc.	15,737 requests	\$808,212.99
Sign Language Interpretation	Accurate Communication, Inc.	1,088 requests	\$235,984.50
Document Translation	Language Line Services, Inc.	95 requests	\$27,177.74
Total Costs			\$1,833,399.34

IV. Provision of Language Access Services

1-Translation Services

ACS clients who are LEP are entitled to receive commonly distributed documents in their preferred language, if available. As stated above, ACS will translate commonly distributed documents into the 10 languages required by the law and most commonly used by the youth and families we serve. For ACS clients who speak other languages, oral interpretation of essential public documents will be provided.

Commonly distributed documents are ACS documents most commonly distributed to the public that contain or elicit important and necessary information regarding the provision of services. ACS essential public documents relate to:

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

Outreach materials such as press releases and digital communications may be considered "commonly distributed" based on an assessment of the needs of the population affected by the program, activity or services.

ACS is committed to incorporate plain language principle for commonly distributed documents by using plain language, where possible, in place of technical, legal, or specialized terms and by using layout and design strategies to make such documents and communications easier to read, understand, and act upon. Over the years, our staff have been trained by the former Mayor's Office of Adult Education and MOIA. ACS will develop a process to review and revise forms and documents previously generated by the Agency to ensure that they meet plain language standards. In 2018, ACS will provide a refresher plain language training for the staff of the Division of External Affairs.

Frontline workers can view and download all translated commonly distributed documents on the ACS website and intranet. In addition, every ACS division is responsible for delivering and distributing translated commonly distributed documents used by their divisions to borough offices.

All translation requests for commonly distributed documents are managed by the Division of Administration, which coordinates resources in order to further expand translation of commonly distributed documents throughout the agency and to keep all translated versions consistent and accurate.

ACS ensures that translation services meet the highest quality by working with the

Department of Citywide Administrative Services (DCAS) to contract with qualified vendors and coordinate secondary review of translations completed by bilingual staff and culturally competent provider agencies. ACS provides feedback from youth, families, frontline workers, and providers to DCAS to enhance the specifications for the 2018 sign language contract renewal.

During an emergency, ACS works with the New York City Office of Emergency Management (OEM) to make certain 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 the 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' language access vendors. Language access will be integrated into the agency's March 2018 Quarterly Continuity of Operation Report (COOP).

2-Interpretation Services

Youth and families interacting with ACS staff have full access to in-person and telephonic interpretation services in over 200 languages (including sign language) through ACS language services vendors. Bilingual ACS staff may also provide interpretation services or serve clients in their primary language.

Interpretation services are available 24 hours per day, seven days per week in over 200 languages and are provided in all interactions between ACS staff and clients who are LEP, deaf, or hearing impaired. This includes but is not limited to:

- in-person interactions at ACS office sites, home and other site visits, and community events expected to last more than one-half hour, and
- over-the-phone interactions expected to last less than one half hour, including on ACS help lines and hotlines.

In-person and telephonic interpretation services are available for client interactions with ACS' contracted providers. Upon initial contact, ACS and provider agency staff 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—a paper card that explains the right to an interpreter in nearly 100 languages—is used to facilitate this process. If it is not possible to determine a client's primary language using the Language Identification Card, telephonic interpretation services are used. The client's preferred spoken language are recorded in the client's file. Staff records each interaction where language access services were provided.

ACS provides interpretation in the 10 languages stated above at public hearings (not including court hearings) and events. The New York State Office of Court Administration is responsible for providing interpretation at court hearings.

The agency supports LEP needs during an emergency response, as part of NYC Emergency

Management protocols, as appropriate. In 2016, all frontline caseworkers received upgraded smart phones to access the ACS Toolkit online and telephonic interpretation services in the field.

3- Notification of free interpretation signage

From the outset of contact with an LEP client, ACS and its provider agency staff use signage and personnel to inform clients of their legal rights to free interpretation services when they are communicating with ACS and its provider agencies.

ACS uses two multilingual signs created by the Mayor's Offices of Immigrant Affairs and Operations to provide notice to the public of the right to free language interpretation services and of the right to contact 311 with language access complaints. Visible versions of the two language access signs are printed internally by ACS and posted in 130 locations across ACS sites citywide. The signage appears in at least 22 languages, including the ten (10) designated languages. The right to language access services is also stated on the ACS website.

Since many children and families receiving child welfare services have their initial contact with ACS in their homes, ACS caseworkers and provider agencies use language identification cards to identify the client's preferred language and to inform the client of the availability of free interpretation services upon initial contact.

If the language identification card does not contain the client's preferred language, or the client is unable to read the card, ACS caseworkers and provider agencies use telephonic interpretation services to identify the preferred language and to inform the client of the availability of free interpretation services.

V - Training

ACS provides training on language access to all newly hired public facing staff during the on-boarding process. Language access training is provided to these new hires through ACS' internal training department, the James Satterwhite Academy, as part of pre-service training. In addition, all newly hired staff at contracted providers are educated on language access obligations and how to access the tools and resources they will need to comply with these requirements.

Once staff members complete training and are assigned to an ACS office site, language access training is supplemented by instruction and guidance annually.

Training for all staff, including the new hires, covers the following topics:

- The rationale for language access;
- Review of agency's language access policy;
- How to identify when a client is LEP and how to identify their preferred language;
- How to explain the right to access free language services;

- How to document preferred languages and language services use in record-keeping systems;
- When to use an in-person interpreter versus a telephonic interpreter;
- Who is permitted to interpret; and
- Where to locate resources such as language identification cards, “how to” videos, and tip sheets.

In addition to trainings on the above topics, all staff attend a one-day Working with Immigrant Families course and a two-day Cultural Competency course. During and after these trainings, staff with access to YouTube can view ACS’ instructional videos on working with an interpreter in child welfare setting. These courses provide opportunities for practice in working with an interpreter and specific topics important to immigrant communities such as U-VISA for non-documented immigrant survivors and youths who are victims of crime, and Special Juvenile Immigration Status (SJIS), a process of providing legal status for non-documented abused or abandoned youth, both for which ACS is a certifier.

In addition, a new Workforce Institute was designed to improve and expand upon staff development and learning opportunities for frontline employees and supervisors across all ACS Divisions. The Workforce Institute, in collaboration with the James Satterwhite Academy, draws upon expertise at universities and other partners in the field of child welfare, strengthens frontline coaching and supervision practices, and utilizes the most effective learning strategies, methods, and technologies to maximize participant learning. ACS tailors Workforce Institute training sessions to the needs of specific divisions and specific staff whenever possible.

VI - Record keeping and evaluation

Since the passage of Local Law 73, ACS has enhanced its efforts to improve language access-related recordkeeping and program evaluation. For example, in 2005, ACS began working with the New York State Office of Children and Family Services to implement changes to CONNECTIONS (CNNX)—the statewide child welfare database—in order to support better collection of preferred language data. ACS staff who use CNNX as their record keeping system enter all relevant information including the preferred language chosen by the LEP client 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. In addition, staff documents each interaction in which language access services were provided.

ACS ensures the quality of its language access services by:

- Addressing all LEP complaints;
- Consulting with youth and families about how well language services are meeting their needs;
- Conducting surveys on the quality of the interpretation services with frontline workers; and

- Sharing all feedback from youth, families, frontline workers, and providers with the language contractors.

Following the expansion of 311’s capacity to take language access complaints, ACS created a process to respond to these complaints within a 14-day timeframe.

The agency monitors the efficacy of this plan and its compliance with Local Law 30 through the Language Access Work Group. This work group is responsible for continually assessing the ACS language access programs and services and identifying potential improvements to such programs and services. The members of this work group include the first Deputy Commissioner, the Director of Immigrant Services and Language Access Affairs, and the heads of divisions.

VII - Resource analysis and planning

ACS will continue to draw from several resources to implement this Plan:

- Language Access Work Group;
- Citywide Materials: ACS will use standardized signage and materials provided by the Mayor’s Office, including the Language Identification Poster, Notice of Translation Services Poster, and various guidance documents;
- Citywide Services: ACS will obtain translation and interpretation contracting services through contracts held by DCAS;
- ACS Office of Advocacy, which tracks all language access complaints from the public;
- ACS’s internal training body—the James Satterwhite Academy—YouTube videos, and the Language Access Toolkit available via ACS’s file-sharing system
- Mayor’s Office of Immigrant Affairs; and
- State and national experts who can assist ACS in identifying best practices.

VIII – Outreach and public awareness of language access services

ACS recognizes the importance of outreach and public awareness of language access services, and ACS will continue to build on ongoing outreach initiatives. Our goal is to ensure that the youth, families, and communities ACS serves are aware of their right to free language services. Through a variety of outreach initiatives—such as our recent multifaceted, citywide media campaign and our community-based workshops—we work to ensure that community members are aware of the full range of services available through ACS and our provider agencies and feel comfortable seeking the services that best meet their needs without fear of discrimination based on language or immigration status.

As part of our effort to reach LEP communities, we look to increase our engagement with ethnic media and our partnership with community-based organizations serving LEP youth and families.

IX – Language Access Complaints

The Office of Advocacy monitors and responds in a timely fashion to all public complaints regarding language access. This office is responsible for receiving, tracking and resolving complaints through 311 and internal processes.

ACS responds to 311 complaints on language access within a 14-day timeframe. Complaints are initially received by the Office of Advocacy, and complaints are investigated or forwarded to the appropriate program area for follow up.

ACS includes information on language access complaints in its annual report to the Mayor’s Offices of Immigrant Affairs and Operations.

X - Implementation plan logistics

ACS will work diligently to execute the initiatives set forth in this Plan. The following is a brief summary of key quarterly milestones for the implementation of this Plan. The Language Access Work Group monitors the implementation of this plan in compliance with City, state, and federal laws. However, three individuals will play key roles in the implementation of this Plan:

- Language Access Coordinator;
- Director of Immigrant Services and Language Affairs; and
- Assistant Commissioner in the Division of Administration, who is responsible for managing all language services contracts and task orders.

Goal One: Support public-facing staff who work with LEP clients

1. Finalize the ACS Language Access Policy, which reflects the obligations of all divisions and contracted providers (Responsible: Division of Policy, Planning and Measurement in collaboration with Language Access Work Group).
2. Create training module on the Policy (Responsible: Division of Policy, Planning and Measurement in collaboration with Office of Curriculum and Registration).
3. Train all public facing staff on the Policy (Responsible: Division of Policy, Planning and Measurement in collaboration with James Satterwhite Academy).
4. Provide a yearly refresher training to all public facing staff on the Policy, related protocols, accompanying services, and accessing the tools and resources they will need to comply with the Policy (Responsible: Division of Policy, Planning and Measurement in collaboration with James Satterwhite Academy).
5. To ensure that LEP families who are visited at home will receive timely and high quality language access services (including virtual remote translation), ACS will distribute 700 tablets to field staff (Responsible: Office of Information and Technology).
6. Train relevant staff in the principals of plain language communications and develop a process to ensure that commonly distributed documents are written in plain language. (Responsible: Division of External Affairs).
7. In accordance to Local Law 30, identify and ensure all commonly distributed

documents are:

- a. screened for plain language;
 - b. translated into ACS's 10 priority languages by vendors;
 - c. reviewed for quality accuracy; and
 - d. made accessible to staff and public (Responsible: Language Access Work Group and Division of Administration).
8. Explore the implementation of an electronic system to replace the extensive paper voucher system for accessing language access services through ACS's vendor contracts and reconciling payments to vendors (Responsible: Division of Administration with Office of Information and Technology).

Goal Two: Collect, measure, and evaluate key data

1. Conduct a formal language services evaluation and institute accountability tools (Responsible: Division of Policy, Planning and Measurement in collaboration with the Office of Advocacy and the Language Access Work Group).
2. Analyze the results of the 2017 feedback from the key stakeholders and use findings to increase the accessibility of language access services (Responsible: Office of Advocacy).
3. Every two years, conduct listening sessions among immigrant communities to gain better understanding of their needs (Responsible: Office of Advocacy).
4. Connections is New York State's federally required Statewide Automated Child Welfare Information System that provides the New York State Office of Children and Family Services (OCFS), local districts and voluntary agencies with an automated data system for child protective, preventive, foster care and adoption. Simply, Connections is a single, statewide, integrated system for the collection and recording of child welfare service information. The Division of Child Protection made a request in March 2018 to OCFS for collection of data on preferred written language to supplement the current collection of data on preferred spoken language at home.

Goal Three: Enhance community awareness and engagement

1. Translate and publish select pages of the website into 10 priority languages (Responsible: Division of External Affairs and Office of Information and Technology).
2. Reinforce ACS commitment to immigrant communities and LEP individuals by reexamining and redeveloping ACS messaging to these communities (Responsible: Division of External Affairs and the Office of Advocacy).
3. Collaborate with trusted stakeholders to disseminate ACS messaging (Responsible: Division of External Affairs and Family well-Being/Community Partnership Project).
4. Outreach to and, when necessary, purchase advertising space in ethnic media to promote ACS events, initiatives, programs and services (Responsible: Division of External Affairs).

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

NEW YORK CITY CIVILIAN COMPLAINT REVIEW BOARD
LOCAL LAW No. 30
LANGUAGE ACCESS POLICY AND IMPLEMENTATION PLAN

I. Agency Mission and Background

The New York City Civilian Complaint Review Board (CCRB) is an independent agency. It is empowered to receive, investigate, hear, make findings and recommend action on complaints against New York City police officers alleging the use of excessive or unnecessary force, abuse of authority, discourtesy or the use of offensive language. The Board's investigative staff, composed entirely of civilian employees, conducts investigations in an impartial fashion. It also mediates complaints by scheduling meetings with the officer, the complainant and trained mediator. The Board forwards its findings to the Police Commissioner. On April 2, 2012, the NYPD and the CCRB signed a Memorandum of Understanding (MOU) which conferred on the CCRB the power to prosecute substantiated cases where the Board recommended "charges and specifications," the most serious discipline. Since 2013, all substantiated cases in which the Board recommends that charges and specifications be brought against an officer are prosecuted by a team of CCRB attorneys in the agency's Administrative Prosecution Unit (APU). The Board is comprised of 13 board members who must reflect the diversity of the city's population. The city council chooses (designates) five board members, with one from each borough; the mayor chooses five, including the chairperson; and the police commissioner chooses three who have law enforcement experience. The mayor makes the official appointments to the board.

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, if and 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 to 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 in order to promote understanding between officers and the communities they serve.

The Board appoints an Executive Director, who as of January 2018, has staff of 168 employees, 101 in the Investigations Division, 4 in the Mediation Unit, 6 in the Outreach and Intergovernmental Affairs Unit, 9 in the APU, and 48 in the Administrative Division. The Administrative Division is comprised of 4 in the Human Resources Unit; 3 in the Communications Unit; 3 in the Management Information Systems Unit, 5 in the Operations Unit, 4 in the Policy Unit, 3 in the Training Unit, 4 in the Complaint Tracking System Team, 9 in the Case Management Unit, 5 in the Legal Unit, 4 in the Executive Staff and 2 noted as additional staff. The CCRB is located at 100 Church Street, 10th Floor in New York City.

In 2017, the CCRB received 4,481 complaints and it is mandated to investigate or mediate these cases prior to the 18 month statute-of-limitation. Most of the complaints received by the agency are referred to the CCRB by the NYPD's Internal Affairs Bureau (IAB). In addition, civilians file complaints by calling the CCRB directly or dialing 311. Civilians also file complaints in person, in writing, by email, via the

agency's website and at police stationhouses throughout the City. Although most complaints are filed by phone – either with an investigator during normal business hours or by leaving a phone-recorded message during non-business hours – the vast majority of complaints require in-person statement with an investigator so that investigators can gather more facts about the case. If the case is suitable for mediation, and if the civilian and officer choose to mediate their complaint, complainants must attend a mediation session with the officer and a trained mediator who is contracted with the CCRB. In 2017, the CCRB conducted over 2,365 civilian interviews and has approximately 33,210 instances of telephone contact with the public.

II. 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 which set forth requirements for:

- Translating documents containing essential information regarding the agency to the public in the 10 designated citywide languages outlined in Local Law 30.
- Making available translation and interpretation services for 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 more accurately memorialize and track this population's concerns with respect to police misconduct.

III. 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 and proportion of LEP persons in the eligible service population. The CCRB has access to statistical information as to the racial and ethnic composition of the boroughs of the city from which complaints are received. These are broken down by Community Boards, zip codes and precincts. The CCRB also has obtained information as to the number of LEP individuals throughout the City, both by geographic distribution and by primary languages most commonly spoken. The CCRB will review, and periodically reevaluate, both of these sets of data to isolate areas which need additional language access services.

DOJ Factor 2: The frequency with which LEP individuals come in contact with the agency. The CCRB estimates that we receive about 20 requests per month for interpretive services that require outside assistance. In the past year, the CCRB has made requests for outside interpretive services in 14 different languages serving over 120 LEP individuals. This figure, however, underestimates the agency's language services because it does not include requests fulfilled by our foreign language pool of employees who speak, among other languages, Spanish, Mandarin, Russian and Arabic. In 2017, the CCRB did not track the number of individuals that the CCRB provides direct translation services.

Investigators first recognize LEP needs of complainants at the point of intake (in-person or by telephone). They are trained to assess the number of individuals that require language assistance services and

determine the language. The staff then make an immediate requires for services either in-house, and if that is not available, with a contracted vendor.

In 2018, the CCRB will enhance our recordkeeping system to better capture both the services provided in-house and by our vendors. With the information gathered by the data captured the CCRB will adjust its specific services if necessary to meet the actual needs of the agency in the future.

DOJ Factor 3: Explanation of the nature and importance of the program/services for the LEP person requiring language assistance. One of the CCRB's primary missions is to encourage civilians to file complaints whenever they feel they have been a victim of or a witness to police misconduct. It is particularly important for the CCRB to provide a voice for traditionally marginalized populations such as the LEP population. Accordingly, it is imperative that the CCRB's core outreach material and all its investigative materials are available in the 10 languages outlined by Local Law 30. Thus, the CCRB has taken steps to ensure that LEP individuals have available to them the means to file and participate in the investigation or mediation of complaints against police officers. The CCRB has identified the essential documents within the agency that require translating into the 10 primary languages and requested funding so that these documents can be made accessible to the entire staff and LEP community. In addition, the CCRB will be incorporating a general correspondence letter to civilians with the 10 primary languages.

DOJ Factor 4: The resources available to the agency and the cost of providing language services. As detailed below, the CCRB will endeavor to make greater use of resources available in-house especially bilingual staff to reduce its reliance on contracted vendors. Given the small size of the agency, however, some reliance of vendors will continue to be necessary. The CCRB has explored video conferencing interpretations to expedite the response time to assist LEP individuals for languages not provided by the in-house investigative staff.

IV. Provision of Language Access Services

The CCRB requires that its staff provide interpretation and translation services during regular business hours to individuals whose primary language is not English and who request such services in order to communicate with the CCRB. These services are provided either in-person at the offices of the CCRB, in the field, or to those seeking assistance by telephone.

Over-the-phone interpretation services are available to all staff members 24 hours a day/ 7 days a week in over 150 languages. These services can be accessed by contacting a contracted vendor.

Language identification is done by either:

- A CCRB staff person identifying the language
- The limited English proficient individual identifying their language from a Language Identification Card ("I Speak Card")
- The vendor identifying the language with the use of specialized linguists over the phone

Interpretation services also must be provided at the following meetings:

- Mediation Sessions
- Hearings conducted by the Administrative Prosecution Unit

Citywide Meetings

The agency holds public board meetings on a monthly basis throughout the City. These meetings are typically covered with interpreters from a contracted vendor. Languages to be provided at these events are determined by responding to specific language requests made by the event host(s) or expected attendees.

Outreach

Contact information posters are posted in every police stationhouse in Spanish. The CCRB will periodically re-evaluate whether contact posters need to be translated into additional languages. Additionally, 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 2017, our Outreach and Intergovernmental Affairs staff conducted approximately 840 total presentations. While the majority of the presentations were in English, some presentations were conducted in other languages (primarily Spanish). Additionally, outreach presentations for LEP audiences in any language will be given upon request.

Investigation/Mediation

Investigators and mediators interact with the public via phone and in-person. When an LEP individual contacts the CCRB, whenever possible, a member of the CCRB staff who is fluent in that person's native language is assigned either to meet with the individual or to act as an interpreter. In the case of a LEP individual who is filing a complaint against a police officer, if there is a staff investigator fluent in that person's native language, that investigator will be assigned to investigate the complaint. If the CCRB does not have such a bilingual investigator readily available, but has someone in another job title who speaks the LEP individual's native language, the CCRB will, whenever possible, assign that staff person to act as the interpreter between the LEP individual and the investigator assigned to investigate the complaint.

If the CCRB does not have a person on staff that speaks the LEP individual's native language, the Operations Unit or the assigned investigator will use DCAS Language Line contract or our existing language services vendors. The use of adult relatives or friends of the civilian as interpreters is only permitted when time is of the essence and no other interpretation alternative is available. In these circumstances, the LEP person is informed in their primary language about the availability of free interpreter services and the potential problems of utilizing a related translator.

The Language Access Coordinators continuously updates the agency's internal list of employees who are willing and able to act as volunteer interpreters and/or translators. The goal has always been to make interpretive/translation services more readily available in-house, thus shortening response time to requests for such services. The CCRB will explore certifying bilingual or multilingual staff members that volunteers to act as interpreters or translators in languages other than English through a private linguistic testing company.

Translation of written material

The CCRB has available its most frequently and essential distributed documents, such as forms, correspondences and informational brochures about its services translated into Spanish, Chinese, Haitian-Creole, Italian, Korean, Arabic and Russian. CCRB brochures are also available on the agency's website in the languages cited above. Palm cards and printed material geared towards the LGBT community are translated into Spanish. At the moment, when complainants are required to fill out and/or sign a document, the CCRB has the interpreter verbally translate the information in the document. The interpreter then reads the document to the LEP individual in his/her native language before he/she signs the document.

By June 30, 2018, the CCRB plans to translate all essential documentation in the 10 designated Citywide languages outlined in Local Law 30 (LL30). These languages are: Spanish, Chinese, Russian, Korean, Bengali, Haitian Creole, Arabic, Urdu, French and Polish. Additionally, the CCRB will periodically

review its outreach material to ensure that it complies with the Plain English guidelines issued by the Mayor's Offices of Adult Education and Immigrant Affairs.

Notification of Free Interpretation Signage

The CCRB will continue to develop methods to ensure that LEP individuals are aware that our services are available to them. This will include informing staff that the agency provides or arranges for the provision of free language assistance services and informing them of the procedure to follow when needing such services.

In addition, the CCRB will note in its printed advertisement and social media that the agency offers free interpretation services upon request.

The CCRB has obtained language identification or "I speak" cards for each investigative squad and at our reception booth. This will assist staff in determining a LEP individual's native language. The CCRB is configured in a way that does not require directional signage (the reception booth is visible immediately upon exiting the elevators on the 10th Floor which the CCRB fully occupies). Complainants or individuals who enter the lobby looking for the CCRB must first sign in at the security desk, after which the guard directs them to the 10th Floor. We will also issue "I speak" cards to the security staff in the lobby of the building to help them identify LEP individuals that visit the CCRB.

Emergency Preparedness and Response

In the event the agency needs to provide critical information to the public in the event of an emergency, this message will be available in 114 languages through the agency website.

V. Training

The CCRB's Language Access Coordinators will work with the Training Unit to develop a comprehensive training that will reinforce to our current and new hires all aspects of LEP policy and its implementation. The policy will be emailed to all staff, as well as distributed in hard copy at training sessions and may be placed on the agency's website. Topics of the training will include: the protocol of use of bilingual staff; the procedure for providing or arranging for the provision of interpretive or translation services means of identifying a LEP individual's native language; and the process for referrals to the pool of foreign language speakers or language service vendors.

A comprehensive training will be provided to frontline staff which will focus on providing "I Speak" cards to LEP individuals and referring LEP individuals to the Language Identification Posters. Division heads will be asked to reinforce the LEP policy and procedures including ensuring proper documentation and tracking of LEP services, documents to aid in identifying the language requested, and how to facilitate interpretation resources.

VI. Record Keeping and Evaluation

The CCRB will continue to record requests it receives and fills through outside sources for interpretive and translations services.

The CCRB further intends to incorporate data regarding interpretation and translation requests into our automated complaint tracking system (CTS). The CCRB will then have the ability to quantify the LEP services provided by the CCRB and perform queries and cross-comparisons of data related to these individuals in order to serve them better.

The CCRB will also develop and implement means for evaluating the quality of the services it provides to LEP individuals. These will include evaluating the language proficiency of the translator, whether members of its own staff or others, as well as requesting feedback from LEP individuals as to their level of satisfaction with the services they have received.

VII. Resource Analysis and Planning

The CCRB will continue to utilize the resources discussed above, as well as any others that become known or available to it, in order to assure continued improvement in the quality of the interpretation and translation service it provides. Our automated system (CTS) coupled with the diversity of 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 agency is committed to the full compliance with Local Law 30 and we are, in effect, removing the barriers to public services that LEP individuals face. For example, by implementing the video conference on-the-spot interpretation services to the staff, the quality and accessibility of language assistance services will be expedited to better serve the community. In addition, in 2018, the CCRB will be seeking to include language letters in all essential correspondence to civilians to assist in facilitating translations.

VIII. Outreach and Public Awareness of Language Access Services

The Director of Outreach and Intergovernmental Affairs and his community outreach team make presentations throughout the five boroughs to a wide variety of groups, including:

- High schools and colleges
- Public libraries
- Tenant associations
- Advocacy organizations
- Community groups
- Non-governmental organizations
- Religious organizations
- Community board meetings
- Precinct council meetings
- LGBTQ-related groups
- NYCHA

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 will be typically covered with interpreters from a contracted vendor.

The CCRB will begin to explore additional ways to inform community groups, organizations and neighborhoods that serve LEP individuals the availability of its free services to LEP individuals. The community outreach team offers attendees of its events a CCRB brochure which describes what to do when 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. It is available in eight languages. This brochure can also be accessed on the CCRB's website (www.nyc.gov/ccrb). By June 30, 2018, this brochure will be translated in the 10 languages outlined in Local Law 30.

IX. Language Access Complaints

The agency has investigative staff members who can interpret complaints for individuals who contact 311. When an individual needs assistance in another language, the agency procedure is to first seek assistance from investigative staff that communicates in the required language. In the event that no investigative staff can provide the assistance, then a name and contact number is documented for a future contact with an interpreter from a contacted vendor. In the event contact is not established with the complainant, a message would be left for the complainant to return our call. The CCRB then makes reasonable attempts to establish communication via phone and mail with complainants. There were 631 complaints received via 311 in 2017.

The CCRB’s website provides the public with the contact name and number for the agency’s Language Access Coordinator. The website also informs the public of the upcoming public board meetings and provides the contact information to a member of the CCRB Outreach and Intergovernmental Affairs should interpretation assistance be required. The website notes interpretation services are free upon request. The agency’s annual report will include all information gathered relating to LEP assistance.

How members of public can submit language access complaints, questions, and requests	Agency 311 Data (CY 2017)	Description of how complaints/requests were addressed
In the past, the CCRB did not have any notifications to the public for how to submit language access complaints, questions and requests. However, the CCRB has since inputted a notation on the CCRB website noting the language access coordinator’s name, title, phone number and email.	# of language access complaints received via 311: 631	Complaints were received via 311 and then forwarded to the intake unit. CCRB complaints were then forwarded to the investigative unit and assigned an investigator.
	# of requests for language access services via 311: Unknown	

X. Implementation Plan Logistics

As of January 2018, the CCRB’s Language Access Coordinators are Investigative Manager Edwin Peña and Senior Investigative Manager Jessica Peña. The name, title and contact information for Investigative Manager Edwin Peña is currently posted on the agency’s website.

The CCRB is committed to insuring that no person is denied its services or denied timely services, simply because that person has limited English proficiency. For this purpose, the Language Access Coordinators will monitor the development of this Plan, its implementation and its effectiveness. The Language Access Coordinators will review the Plan at least annually and modify it as needed. Once the final draft of the Language Access Policy and Implementation Plan is approved by the Mayor’s Office of Immigrants Affairs (MOIA), it will be posted on the agency’s website.

Language Access Goal	Milestone	Responsible staff	Deadline
General Correspondence Letter notifying of free translation services provided by the agency to be included with all mail communication	July 1, 2018	Investigative Manager Edwin Peña and Senior Investigative Manager Jessica Peña	February 15, 2018
Develop comprehensive LEP policy and implementation training for current and new hires	July 1, 2018	Investigative Manager Edwin Peña and Senior Investigative Manager Jessica Peña	March 1, 2018
Final Language Assessment Report due to MOIA	March 30, 2018	Investigative Manager Edwin Peña and Senior Investigative Manager Jessica Peña	March 30, 2018
Enhance recordkeeping regarding the number of assistance provided to LEP individuals by the agency	July 1, 2018	Investigative Manager Edwin Peña and Senior Investigative Manager Jessica Peña	April 15, 2018
Final Version of Language Access Policy and Implementation Plan due to MOIA	April 2018	Investigative Manager Edwin Peña and Senior Investigative Manager Jessica Peña	N/A
Develop a survey to capture the level of service provided by our in-house staff or private contractors to LEP individuals	July 1, 2018	Investigative Manager Edwin Peña and Senior Investigative Manager Jessica Peña	May 15, 2018
Translating all essential documents disseminated to the public in accordance to LL30	July 1, 2018	Investigative Manager Edwin Peña and Senior Investigative Manager Jessica Peña	June 1, 2018
Review of Language Access and Implementation Plan	January 31, 2019	Investigative Manager Edwin Peña and Senior Investigative Manager Jessica Peña	January 18, 2019

Language Access Policy and Implementation Plan: 2018 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 January 2018.

Name and title of Language Access Coordinator: Edwin Tablada, 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 (718) 722-3131.

The Commission currently has a total staff of approximately 141 staff members with a projected headcount of 150 staff members for Fiscal Year 2018. Most of these individuals work in the Manhattan central office (22 Reade Street), which is where LEB is located.

AGENCY LANGUAGE ACCESS POLICY AND GOALS

The Commission is 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. 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. 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, since Commissioner and Chair Carmelyn P. Malalis began her tenure in February 2015, language access has been one of her core priorities, and many of those efforts over the past three years are reflected in this document.

Implementing this updated Language Plan will ensure that all Commission staff understand the Commission’s commitment and prioritization of language access and the policies and practices that are in place to operationalize this work.

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: 2009-2013”, residents who live in the New York-Newark-Jersey City area who speak English less than “very well” are most likely to speak: Spanish, Chinese, Russian, French Creole, Korean, Italian, Polish, Portuguese, Bengali, and Arabic.

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

LEB transitioned to a new case tracking system in 2017 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 January 2017 to the end of December 2017, the Commission fulfilled 1,658 requests for interpretation through multilingual staff and the use of Voiance, with which the Commission has a contract for telephonic interpretation, in-person interpreters. The Commission maintains this information organized by language, which is used to inform the Commission’s staffing needs and translation and interpretation priorities.

The Commission's CRB has access to statistical information regarding the racial and ethnic composition of the borough each Community Service Center serves and will continue to expand and develop relationships within different racial and ethnic communities throughout the boroughs. CRB is currently working with the Commission's Information Technology department to expand the system LEB uses to track its cases to include CRB's community work. This will allow CRB to better track language use and needs for events, meetings, and presentations. The Commission will continue to assess the LEP populations it serves, and to offer the widest level of language access possible.

Of the 1,658 fulfilled requests for interpretation in 2017, over one thousand, an overwhelming majority (81%), were for Spanish, while Mandarin, Russian, Bengali, French, Arabic, and Korean requests closely 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. All other translation will be performed on a case-by-case basis.

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

As stated above, 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 reflects 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 our clients in their preferred language.

During Fiscal Year 2017, the Commission spent approximately \$57,934 on language access services including over-the-phone interpretation, written translation, sign language interpretation, and on-site interpretation.

LANGUAGE ACCESS IMPLEMENTATION PLAN FY'17 VENDOR & COST BREAKDOWN		
TYPE OF SERVICE	VENDOR	AMOUNT
Over-the-Phone Interpretation	Voiance Language Services	\$3,268.75
	Total for Over-the-Phone Translations	\$3,268.75
Written Translation Services	Language Line Services	\$21,579.36
	Language Bank	\$1,155.00
	Legal Interpreting Services	\$8,428.00
	Eriksen Translation Services	\$9,450.65
	Total for Written Translations	\$40,613.01
Sign Language Interpreting Services	Legal Interpreting Services	\$8,050.00
	Accurate Communications	\$534.54
	Total for Sign Language Interpreting	\$8,584.54
On-site Interpretation	Legal Interpreting Services	\$5,467.76
	Total for On-site Interpretations	\$5,467.76
	GRAND TOTAL	\$57,934.06

PROVISION OF LANGUAGE ACCESS SERVICES

A. Law Enforcement Bureau

The Commission will continue to provide interpretation services in all available languages through its staff members' language capacity, the Citywide Volunteer Language Bank ("VLB"), and phone interpretation through its contract with Voiance. LEB staff members currently speak 23 languages, up from approximately six languages three years ago, and can therefore provide customer service to the public in those languages from the time of the initial call to the Commission's Infoline through an investigation of a complaint and into the trial phase of the prosecution of a case. When LEB does not have a staff member available to speak a person's language directly, LEB hires professional interpreters for in-person intake and witness interviews or uses Voiance for telephonic interpretation. For written translations, LEB first uses the Volunteer Language Bank, and if unavailable, hires a professional translator.

LEB interacts with members of the public by phone and 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. LEB's Infoline staff can conduct the initial phone assessment in six languages (Spanish, French Creole, Arabic, Hindi, Urdu, or Nepali). If the individual speaks

a language other than the six identified, Infoline staff immediately call 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. If no staff with the requisite language skills are available, the attorney will use phone interpretation by Voiance during the interview.

LEB's intake form is 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.

LEB has translated fifteen commonly distributed documents (defined as documents that are regularly sent to parties in the investigation, enforcement, and mediation processes) into ten languages in addition to English: Bengali, Spanish, Haitian Creole, Russian, Chinese, French, Korean, Urdu, Polish, and Arabic. LEB also sends out an insert with service of all correspondence in the enforcement process containing an advisory in 23 languages that the document contains important information about the case and provides a phone number of an LEB staff person to call for verbal, over-the-phone interpretation of the document. The Office of the Chair ("OC") is also in the process of translating four core documents it regularly uses in communicating with parties—when parties appeal LEB determinations, for example—into the above languages. The Commission will continue to assess the language access needs of the agency and of the population it serves.

B. Community Relations Bureau

For any outreach events, public hearings, or trainings, CRB 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.

CRB continues to make outreach and public awareness of the Commission's services and expanded language capacity an integral part of its work by collaborating with the offices of local elected officials and community-based organizations to have mobile pre-intake clinics, days of outreach and visibility, and by displaying our signage and literature in all available languages in CRB's Community Service Centers and at public events. Many CRB presentations are given in, or interpreted into, Spanish, Russian, French, Mandarin, Haitian Creole, Bengali, Hindi, and/or American Sign Language by Commission staff. These languages were chosen based on staff capacity and community need.

C. Commission-Wide Policies and Practices

The Commission currently has signage developed by the Mayor's Office of Immigrant Affairs in conspicuous locations at its main location and at its four satellite Community Service Centers that advises members of the public of their right to free interpretation.

The Commission now requires that all staff complete a language access questionnaire during the on-boarding process so that the Commission's Language Access Coordinator can track the Commission's in-house language capacity as it continues to grow. The Commission's total language capacity as of January 2018 is 36 languages spoken agency-wide.

As the Commission develops new print and web materials for large-scale distribution, it will continue to use a certified outside vendor to translate print materials into the following ten languages: Bengali, Spanish, Chinese, Korean, Russian, French, Haitian Creole, Arabic, Polish, and Urdu. The Commission will continue to work to ensure that its literature is written in plain language and is translated accordingly. The Commission also uses internal staff to review professionally translated materials.

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, Restorative Justice, and Development and is regularly updated with approval from the agency's Language Access Coordinator.

RECORD KEEPING AND EVALUATION

The Commission will continue to track requests for both interpretation services and translations through LEB's case-tracking system and will build out this capacity as other agency departments are added to the new tracking software. It will also develop and implement means for evaluating the quality of the services it provides to LEP individuals. This may include 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 also receive 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 Language Access Coordinator, in partnership with staff in all departments, will monitor the efficacy of this plan and compliance with Local Law 30.

RESOURCE ANALYSIS AND PLANNING

The Commission will continue to utilize the resources discussed above, as well as any others that become known or available to it, in order to assure continued improvement in the quality of the interpretation and translation services it provides. The Commission is committed to full compliance with Local Law 30. The Commission will continue to prioritize the hiring of individuals with existing contacts and relationships with communities that have not historically been served by the Commission, including certain LEP communities, and will prioritize the hiring of individuals that have the skills to increase the Commission's language capacity.

OUTREACH AND PUBLIC AWARENESS

CRB is working to increase its outreach to various immigrant communities throughout the City and regularly 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 will make available all of its latest 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 releases content in Spanish and other languages on all Commission social media. The Commission will also continue its ongoing efforts and investment in New York City's diverse community media outlets. Through persistent outreach and advertising placement in media most relevant to the communities the Commission serves, the Commission has kept an open dialogue with some of our city's most vulnerable and hard-to-reach communities. The Commission will continue to produce its advertisements in various languages to be placed effectively in ethnic print media, including Arabic, Bengali, Spanish, Chinese, Korean, and Urdu, and in FY17 ensured 100% of all radio and print advertising was either in community or ethnic media. The Commission will continue to focus its advertising budget on community and ethnic media in multiple languages moving forward. Further, all future large-scale public information campaigns by the agency will include strategic outreach to the large number of ethnic media that serve LEP communities in the five boroughs in the form of advertisements, press stories, and panel discussions with reporters and editors working at these media outlets.

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.

IMPLEMENTATION PLAN LOGISTICS

The Commission is committed to ensuring that no person is denied services or denied timely services simply because they have limited English proficiency. Further, the Commission is committed to ensuring that all members of the public who seek the Commission's services are treated with dignity and respect. To that end, the Language Access Coordinator, Policy Analyst Edwin Tablada, 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:

1. Train all staff on the updated Language Access Plan and cultural competency in working with LEP individuals;
2. Prioritize the hiring of staff to increase internal language capacity to reflect the Commission's service population;
3. Ensure social media content is consistently published in Spanish, English, and other languages;
4. Develop trainings and presentations in Spanish, Russian, French, Mandarin, and Haitian Creole, and eventually additional languages;
5. 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;
6. Create citywide media campaigns with components translated into languages other than English;
7. Translate major Commission materials into ten languages in addition to English;
8. Plan outreach events to LEP communities; and
9. Improve data collection systems to track LEP individuals seeking the Commission's services.

Department for the Aging (DFTA) Language Access Policy and Plan Fiscal Year 2018

The New York City Department for the Aging Language Access Plan complies with Local Law 73 and Executive Order No. 120 of July 2008, titled Citywide Policy on Language Access to Ensure the Effective Delivery of City Services. DFTA has had a Language Access policy and plan since fiscal 2009. This updated Plan includes requirements of Local Law 30, which went into effect on July 1, 2017.

1. DFTA Mission and Background

Agency Mission

The NYC 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, as well as to support of their caregivers, through service, advocacy, and education.

DFTA is the lead Mayoral agency addressing public policy and service issues affecting older New Yorkers. Through its community partners and direct service units DFTA serves more than 200,000 older New Yorkers and their caregivers. DFTA is also the largest agency in the Federal network of Area Agencies on Aging (AAA's). In this capacity, the Department advocates on legislative, regulatory, and socio-economic issues that affect older adults.

The goals of DFTA's programs and initiatives are to:

- promote and support the independence of older New Yorkers;
- eliminate ageism;
- inform and educate the general public about aging issues, services, supports, and opportunities for older New Yorkers and their families;
- be a catalyst for increased resources to enhance and expand programs and services for older New Yorkers;
- ensure the provision of quality services fairly and equitably to older New Yorkers; and,
- enhance and expand effective, productive partnerships with consumers, advocates, private and public organizations.

Services Provided by the Department for the Aging

DFTA provides the majority of its services through contracts with community-based and other organizations. DFTA-funded core community services include:

- Senior centers: The Department currently funds over 240 senior centers, located in every Community Board and are attended by nearly 30,000 individuals daily.
- Case management: Case Management is the gatekeeper for DFTA funded in-home services such as home delivered meals, home care, and friendly visiting. All clients receiving an in-home service funded by DFTA receive a comprehensive assessment from a case management agency.
- Home delivered meals: The Home Delivered Meals program provides nutritious meals to older New Yorkers while creating greater choice to address the future needs of a growing homebound population.
- Home care: The Home Care program is designed for low-income seniors 60 years 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 at least 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: DFTA provides oversight of ten contracted Title III-E National Family Caregiver Support Programs. These community based organizations support caregivers by providing information on long term care topics and resources, assisting caregivers in accessing benefits and entitlements, offering individual counseling, support groups, and care-related training, linking with in-home, congregate, and overnight respite care, and offering supplemental supportive services. Grandparents or other older relatives who are solely responsible for raising their grandchildren age 18 and under are also eligible for services, as are older adults caring for their adult disabled child.
- 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: Through this program, seniors who are experiencing any of several forms of maltreatment (physical, sexual, financial, psychological, and/or active or passive neglect) by someone who has a special or “trusting” relationship with the elder (a spouse, a sibling, a child, a friend, a caregiver, etc.) are provided with direct services. The objective of elder abuse intervention strategies is to increase the client’s sense of control and self-acceptance and to provide a range of legal and social service options for ending abuse.

DFTA provides the following core services directly:

- Health insurance information counseling and assistance (HIICAP); HIICAP conducts public outreach presentations and workshops for older adults, community partners, and other groups on Medicare, Medicaid, Medigap, Elderly Pharmaceutical Insurance Coverage (EPIC), private health insurance and Medicare’s preventive services. HIICAP’s counselors are state certified who provide assistance with Medicare Part D prescription plan selection and enrollment by appointment and over the telephone, among other services. HIICAP has 33 community based sites citywide that offer 15 different language capabilities.
- Senior employment: DFTA’s Senior Employment Unit 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 training components include a variety of online courses geared toward helping participants become more successful in their job search.
- Caregiver/grandparent information and assistance: The Caregiver Resource Center consists of social workers who offer support through the provision of information, assistance, and referrals to individuals caring for older New Yorkers; consultation is provided to professionals who request guidance for their clients; and informational sessions on relevant long term care topics are conducted for caregivers, professionals, seniors, and the community at large. These presentations include areas such as Alzheimer’s disease, caregiving, residential alternatives, and community resources. These sessions are offered in English, Spanish and Mandarin. In support of the Department’s Health Promotions Unit, workshops on the evidenced-based Chronic Disease and Diabetes Self-Management programs are conducted in Mandarin and Cantonese.
- Elderly crime victims information and support: 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, the Bronx and Staten Island – provide crisis intervention, counseling, advocacy, information and assistance, limited emergency financial assistance, and legal services referrals.

- One-on-one free assistance to older persons who need help with checkbook maintenance and bill paying: The Bill Payer Program works to assist low income seniors in paying their bills on time, while protecting them from financial exploitation. The program helps financially vulnerable seniors to remain in the community with the assurance that their monthly financial obligations have been met.

For more information about DFTA's services, please visit our website at: www.nyc.gov/aging.

2. DFTA Language Access Policy and Goal

Individuals are considered to be of Limited English Proficiency (LEP) when they are not able to speak, read, write or understand the English language at a level that allows them to interact effectively with service providers. In keeping with the Department's mission to serve older New Yorkers, DFTA is committed to ensuring that limited English is not an obstacle to older LEP individuals.

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:

- Ensuring DFTA staff, provider and public are aware of and knowledgeable about DFTA's Language Access Policy;
- Providing staff with access to and usage of the Language Line and New York City Volunteer Language Bank;
- Requiring providers contracted with the NYC Department for the Aging 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 agency compliance with standards;
- Translating commonly distributed documents in the 10 designated citywide languages; and
- 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;
- Implementing a protocol for Provision of Language Access Services by DFTA's Staff.

3. 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

Primary Languages of Older New Yorkers

Based on the American Community Survey (ACS) 2011-15 data, the top ten most frequent non-English languages spoken at home by older New Yorkers 60+ are Spanish (20%); Chinese (6%); Russian (4%); Italian (2%); French Creole (2%); French (1%); Greek (1%); Tagalog (1%); Korean (1%); and Polish (1%).

The Primary Languages of DFTA's Clients Served During Fiscal 2017

During Fiscal 2017, DFTA served over 200,000 older New Yorkers and their caregivers; of those:

- 32,989 speak a primary language other than English; and,
- 26,636 can't speak, read, or understand English.

The language breakdown of all DFTA clients whose primary language is not English is as follows:

- Spanish (57%)
- Chinese - includes Cantonese, Mandarin and other dialects (32%)

- Russian (5%)
- Korean (2 %)
- Polish (1%)
- Other¹ (3%)

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 Fiscal Year 2017. The most common languages spoken among these individuals who can't speak, read or understand English are: Spanish (57%); Chinese (24.7%); Russian (7.7%); Korean (5.1%); and Polish (1.2%).

Number of Contacts with DFTA funded programs	Limited English Proficiency					
	Yes		No		Total	
	Clients	Percent	Clients	Percent	Clients	Percent
Less than 10 times	10,782	38.4%	90,526	46.3%	101,308	45.3%
10 ~ 24 times	4,213	15.0%	27,668	14.1%	31,881	14.2%
25 ~ 49 times	3,213	11.4%	21,075	10.8%	24,288	10.9%
50 ~ 99 times	4,176	14.9%	28,286	14.5%	32,462	14.5%
100 ~ 199 times	3,553	12.7%	18,951	9.7%	22,504	10.1%
200 and more times	2,141	7.6%	9,146	4.7%	11,287	5.0%
Total	28,078	100.0%	195,652	100.0%	223,730	100.0%
Average Contacts	55.4 times		43.4 times		44.8 times	

In FY2017 DFTA provided more than 600 over the phone interpretation in more than 20 languages through its Language Line Services. The table below shows the languages for which translation was provided and the number of calls for each.

Language	Number of Calls
Spanish	259
Russian	90
Chinese	157
Korean	39
Haitian Creole	11
Arabic	8
Polish	7
French	7
Bengali	7
Romanian	6
Italian	5
Farsi	4
Greek	3
Hindi	3
Fuzhou	3

¹ Other includes fewer than 100 clients. Language distribution: Abkhazian, Afrikaans, Albanian, American Sign Language, Amharic, Arabic, Armenian, Bengali Bangla, Bulgarian, Burmese, Cambodian, Catalan, Cherokee, Corsican, Creole, Creole Spanish, Croatian, Czech, Dakota, Dutch, Egyptian (EGY), Esperanto, Estonian, Farsi, Finnish, French, French Creole, Georgian, German, Greek, Guarani, Gujarati Haitian Creole, Hebrew, Hindi, Hungarian, Indonesian, Interlingue, Irish, Italian, Japanese, Kirundi Kurdish, Latin, Latvian Lettish, Lingala, Lithuanian, Macedonian, Malay, Malayalam, Maltese, Marathi, Moldavian, Nepali Persian, Portuguese, Punjabi, Rhaeto-Romanc, Romanian, Samoan, Serbian, Serbo-Croatian, Sindhi, Singhalese, Slovak, Slovenian, Somali Sudanese, Swahili, Swazi, Swedish, Tagalog, Taiwanese, Tamil, Tegulu, Thai Tibetan, Toishanese, Turkish, Twi, Ukrainian, Urdu, Uzbek, Vietnamese, Yiddish, Yoruba.

Albanian	2
Fukienese	2
Hungarian	2
German	1
Laotian	1
Turkish	1
Portuguese	1

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

All of DFTA's programs and services are important to ensuring older adults are safe and secure, and age well in their communities. The lack of, or delay of access to, translation or interpretation services can have serious implications for LEP older adults and their caregivers trying to access these services.

Factor 4: Resources available to the agency and the costs of providing the various language services.

DFTA's current resources include Language Line Services, which offers translation and interpretation services in over 170 languages, and DFTA's multilingual staff who can competently assist LEP individuals in the languages they speak. DFTA also contracts with translation providers for document translation. Costs for these services can be made available upon request.

4. Provision of language access services

Protocol for Provision of Language Access Services by DFTA's Staff

- All DFTA staff interacting with potential clients and/or service information seekers will take the following steps in providing service to walk-in individuals:
 - When a walk-in customer appears to be LEP, staff will attempt to verbally ascertain the primary language spoken by the customer.
 - If verbal communication is unsuccessful, staff will use a Language Identification Card to facilitate communication. Language Identification Cards will be available in all reception areas and units.
- When individuals visiting DFTA's offices need language services, they will be assigned to a bilingual staff person who speaks his/her language if available.
- If an appropriate bilingual worker is not available, Language Line interpreter services will be accessed.
- Callers to direct service units or individuals contacted by phone will be asked their preferred language for communication if it appears they are LEP and interpretation services will be provided.

Primary language will be tracked in DFTA's Correspondence Tracking System (CTS) and correspondence, including mail and emails to specific LEP persons will be translated into the language the individuals speak if requested.

Translation and interpretation services will be provided primarily by Language Line or any other certified vendors with whom the agency contracts in the future. Other services available to clients through the agency's contract with Language Line include video interpretation, on-site interpretation, and document translation. All DFTA's direct services units have access to the Language Access line.

The department will also register with and use the Volunteer Language Bank for reviewing translations.

Translation of essential service documents and announcements

Essential service documents and announcements identified by DFTA programmatic units, will be translated into the top 10 languages of Older New Yorkers and/or the City's 10 designated citywide languages where applicable. Using the data included in the four factor analysis, DFTA's priority, given current limited resources, will be to translate documents into the languages that best meet the needs of the New York City's senior population or target areas. The top ten languages spoken by New York City's seniors include three languages not included in the citywide designated languages – Italian, Greek, and Tagalog. The department will:

- Maintain a list of specific documents requiring translation from DFTA Bureau Heads.
- Develop a protocol for staff requests for formal translation of DFTA documents.
- Provide translated routine documents to DFTA's contracted providers (e.g.: consent forms, contribution requirements, complaint procedures, etc.).
- Maintain a record of documents translated during the fiscal year and languages into which they were translated.

Use of Plain Language

Documents targeted for translation will be written in plain language to ensure that information is accessible to a range of literacy levels. Staff responsible for developing these documents will receive plain language training. Documents will be reviewed for readability and clarity, and edited where necessary, prior to translation and dissemination to the public. When appropriate or feasible, multilingual taglines or graphics will be added to documents written in English to assist LEP individuals in understanding the information provided, and to inform them that free language assistance is available.

Signage

Multilingual signs will be placed in the reception areas of the programs who receive walk-ins informing visitors of the availability of free interpretation services. Signs will be in the ten designated citywide languages, which includes the top five languages spoken by New York City's seniors.

Addressing language access needs in the agency's emergency preparedness and response

Materials produced for publication by DFTA's Bureau of Emergency Preparedness (BEP) will be translated in the 10 citywide designated languages (see appendix for a list of the commonly distributed documents distributed by BEP). Information on emergency preparedness to community partners will be in the languages most commonly spoken by their communities. Language Access will also be incorporated into DFTA's Continuity of Operations Plan (COOP)

5. Training

DFTA's Center for Organization Development and Strategic Initiatives develops and conducts or facilitates language access and cultural competency trainings for direct service staff, supervisors, and program officers who are responsible for monitoring contracted providers. (See appendix for copy of curriculum).

6. Record Keeping and Evaluation

The department will maintain records of all language services provided by the agency. A formal tracking system will be developed and each direct service unit will be required to document all language services provided on a monthly basis.

Based on the information gathered from each unit, the Language Line invoices, and 311 data, the Language Access Coordinator will prepare quarterly reports for DFTA's Executive staff. DFTA will also maintain a record of the number of bilingual interpreter staff providing services and the language they are proficient in, as well as a list of documents that have been translated and disseminated.

All providers contracted with the NYC Department for the Aging are required to have plans and policies in place to address the needs of LEP individuals and compliance will be monitored as a part of the provider's assessment. As per the Department's General Standards of Operation (Standard 2 Compliance 2.1 and 2.2):

Compliance 2.2. 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.*

Compliance 2.2. The program is culturally competent.

- *All service activities reflect (1) understanding of the needs, characteristics, cultural expectations and preferences of different ethnic groups residing in the community; (2) sensitivity and responsiveness to issues relating to culture, religion, socioeconomic status, gender identity, sexual orientation and immigrant adjustment; (3) sensitivity to cultural barriers impeding service utilization, including but not limited to language barriers; and (4) knowledge of linguistically and culturally competent service providers in the community and City, and ability to refer individuals to these providers when needed.*
- *All services are provided with respect for cultural differences, preferences and styles of communication, and with skill in assisting individuals in overcoming cultural and linguistic barriers. As appropriate to the type of services provided, cultural preferences are respected – e.g. through foods served, holiday celebrations, social activities and program communications.*

7. 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:

Deputy Assistant Commissioner 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:

- Facilitating the coordination/implementation of Language Access Policy;
- Coordinating Language Access Policy and Plan Implementation with key DFTA staff;
- Reviewing (monthly) the use of language interpretation services (Language Line, Volunteer Language Bank, etc.) to identify new needs and ensure suitability of contracted translation providers to DFTA needs;
- Coordinating with the Volunteer Language Bank on translation confirmation requests;
- Keeping records/notes on items that need to be added to, and/or changed/updated in, the Language Access Plan annually;
- Tracking, and preparing reports on, Language Access Plan implementation;

- Working with the Supervisor of Policy and Correspondence (SPC) to update the Language Access Report to the Mayor's Office of Immigrant Affairs;
- Preparing monthly, quarterly and annual reports on Language Access.

Deputy Commissioner for Program Operations:

- Ensure implementation of Language Access Policy, as it pertains to DFTA's Bureau of Community Services, Bureau of Long Term Care, Bureau of Active Aging and Bureau of Health Care Connections.

Director of Public Affairs:

- Ensure that DFTA's public announcements and key publications are translated into the 10 designated citywide languages and top 10 languages of older New Yorkers.

DFTA General Counsel:

- Provide supervision to DFTA's General Services unit; this is the unit responsible for the procurement and management of the Language Line contract.

Director of the Center for Organization Development and Strategic Initiatives:

- Develop and conduct language access and cultural competency trainings for direct service staff, supervisors, and program officers who are responsible for monitoring contracted providers.

8. Outreach and Public Awareness

The department will keep the updated Language Access Policy posted on its website in the top 5 languages in NYC where all stakeholders (Internal staff, providers, older New Yorkers, general public, etc.) can have access to it. Annual reminders about DFTA's Language Access Policies will be sent from the Commissioner to staff and providers, with DFTA's language access policy attached and the location on the Internet referenced. A copy of the Language Access Plan will be included in New Staff Orientation materials.

9. Complaint Procedure

Information about how to file a complaint is included in each internal and external provider Bill of Rights and Grievance Procedures, which are distributed to clients and/or posted in public areas as well as are located on DFTA's website. This year DFTA will be posting the contact number of the language access coordinator, as well as the procedure for filing language access complaints, in the top 10 languages, on DFTA's website. The language coordinator will be responsible for keeping a log of all complaints, and ensuring that all complaints are addressed in a timely manner.

10. Implementation Plan Logistics

Language Access Goals	Milestones
Identify a Language Access Coordinator.	The Department is in the process of identifying the coordinator.
Develop a tracking system to track complaints and document language translation services provided.	The Department has been working on building and programming a new Correspondence Tracking System that will track all of the agency's correspondence, complaints, including those language access related, as well as internal and external requests for translation.
Develop a complaint form and post on the internet.	
Develop a protocol for staff requests for formal translation of DFTA documents.	
Incorporate Language Access into the Continuity of Operations Plan (COOP)	
Ensure that multilingual staffers are tapped to table at disaster service assistance centers and multilingual materials provided.	
Develop a system to monitor whether language services are being provided by contracted providers.	
Ensure that all Programs and In-House Units have Language Cards Posted	Assess who has cards and who does not Purchase cards to distribute for posting. Distribute cards and follow-up to confirm that they have been posted.
Review the Clarity of Materials to be Translated.	Review documents for clarity (plain language) prior to translation.
Identify and Prioritize Documents for Translation.	Identify which essential documents are to be translated into which languages and the priority for translation.
Convene the first biannual multi-Bureau Language Access Meetings.	PPAU will meet with Bureaus twice yearly to evaluate and report on actions taken to meet language access goals and priorities.



Language Access Implementation Plan
July 2018



Jody Kaplan, Chief Customer Officer
Lisa Lewis, Director of Customer Service
Language Access Team
Department of Buildings

Rick D. Chandler, P.E.
Commissioner
Department of Buildings

Bitta Mostofi
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Mayor's Office of Immigrant Affairs

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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.

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.

Role and Responsibilities of the Language Access Coordinator

The Language Access Coordinator at the Department of Buildings is Lisa Lewis, Director of Customer Service. In this role, she 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

I. 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 Building Code, Zoning Resolution, and other applicable laws. Each year it reviews over 60,000 construction plans, issues over 110,000 new and renewed permits, performs over 300,000 inspections, and issues 12 types of 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 Building 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 Alarms
- Fire Suppression Systems
- Foundation/Earthwork
- Fuel Burning/Storage
- Mechanical and HVAC (Heating, Ventilating and Air Conditioning Systems)
- New Building Construction
- Places of Assembly (PA)
- 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 Coordinator
- Site Safety Managers
- Cement Testing Laboratories
- Master Electrician
- Special Electrician

Registrations

- Construction Superintendents
- Filing Representatives
- General Contractor

II. 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 assistance plan for our Limited-English Proficient (LEP) applicants, homeowners, business owners and other customers. This year this includes:

- Evaluating current policies and developing new internal and external training and outreach initiatives.
- Recruiting more internal bilingual volunteers.
- Identifying documents for translation that affect public and worker safety.
- Implementing plain language guidelines and providing cultural sensitivity resources.

III. Limited English Proficiency (LEP) Population Assessment

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 an internal survey of our customers. Our 2017 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. Data is also taken from the American Community Survey made available by the NYC Department of Planning: <https://www1.nyc.gov/site/planning/data-maps/nyc-population/american-community-survey.page>.

How members of public can submit language access complaints, questions, and requests	Agency 311 Data (CY 2017)	Description of how complaints/requests were addressed
By calling or submitting an online request to 311	# of language access complaints received via 311: 0	N/A
	# of requests for language access services via 311: 0	N/A

- 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:

Language	Vendor	Volunteer
Cantonese	2	1
Mandarin	43	2
Spanish	29	16
Korean	8	
Russian	4	
Arabic	1	
French	1	
Hungarian	1	
Polish	1	
Punjabi	1	
TOTAL	91	19

- 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 but with limited resources our focus is on the activities that directly impact public safety including outreach, issuance of violations, vacate orders and stop work orders, legal actions, and life and safety notices. Information about and an understanding of these activities should be effectively communicated to all persons immediately affected.
- Factor 4: The resources available to the agency and the costs of providing language services**
 We will budget for and utilize the current vendor contracted by the NYC Department of Information Technology and Telecommunications, Language Line Services, Inc., for telephone interpretation and Geneva Worldwide for document translation services. We will also make use of the citywide and internal volunteer language bank and actively recruit more internal volunteers.

IV. Provisions 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 will identify and translate the most commonly distributed or requested materials by our customers that provide information related to public and worker safety. We will review and revise documents following the plain language guidelines prior to translation. We will include materials about emergency preparedness and response as key documents needing translation.

A. Translation Services

- **Identify Essential Documents**

We conducted an internal survey and found the following documents to be essential to assisting our customers based on public safety and frequency of request. We will make the following documents available in the designated citywide languages:

- AEU-2: Certificate of Correction
- LS-4: No Access Notice
- Stop Work Order
- Vacate Order
- Notice of Violation

The translation of these documents and their availability will be shared with ethnic and community media. We will continue to identify documents that pertain to public and worker safety.

- **Plain Language Guidelines and Standards**

The Chief Customer Officer has provided citywide training on plain language standards and will review all documents before translation. In addition, she will provide training to staff who draft service notices and other communication documents to ensure compliance.

- **Service Notices, Press Releases and Website Content**

The internal language access committee will address having content available in other formats in addition to PDF and images so that the tools available on nyc.gov allow for these documents to be translated.

- **Ensure Quality of Translations**

The Department will obtain translation services only from vendors who have a master contract with the City through an extensive RFP process. Vendors will have internal proofing and editing processes. When available, the Department's bilingual staff will review translated documents for quality, accuracy and appropriateness of terminology. Based on customer feedback and standards created by the internal language access committee, internal staff will be evaluated for effectiveness in providing translation services. Internal outreach will also be 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 (telephonic interpretation)
 - Telephone interactions (telephonic interpretation)
 - Inspector visits to properties (telephonic interpretation)
 - 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 does 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 the Language Line and seek assistance from the vendor to identify the language.
- Provided Interpretation Services
The Department will provide (spoken) interpretation in over 100 languages by our existing bilingual staff volunteers and paid vendor, Language Line. The contract is in place with Language Line Services. As the staff of the Department of Buildings has grown, we will work to identify new volunteers that can provide interpretation services.
- Ensure Quality of Interpretation Services
The Department will use competent interpreters who have demonstrated proficiency in both English and the intended language, 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 Signage

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. The following signage will be evaluated and implemented:

- Multilingual way-finding and/or office signage at service centers that also notify customers of free interpretation services
- Statements concerning language assistance in outreach materials and messages on our website
- Messaging in presentations to agencies and organizations that refer customers to the agency
- Updated Homeowners Night posters that include free offer of language access services message
- Website message about free language access services

- Materials for inspectors to distribute that indicate availability of free language access services

D. Emergency Preparedness and Response

The Department's Emergency Response Team has access to Language Line Services and received language access training along with all Department inspectors. A language access representative will be added to the Department's Continuity of Operations (COOP) planning committee to ensure that NYC Emergency Management protocols are followed.

V. Training

The Department's effective commitment to Local Law 30 requires trained and knowledgeable staff. The Customer Service Unit staff led by its Deputy Director conducts the 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.

VI. 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 tracking the number of 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, scheduled appointments, and Homeowners' Night.

Efforts are underway to create a yearly report, supervised by the language access coordinator that lists site visit survey results, activities to date and other indicators for successful language access services. This will also include an annual review of the language access plan to assess changes in the LEP population and services requested, effectiveness of existing language assistance to LEP persons, staff knowledge and implementation of the plan, review of active language volunteers and efforts to recruit staff that can provide additional language services, modifications needed to interpretation services contracts, community feedback and efforts to address complaints filed due to language access problems.

To ensure the success of the language assistance program, the customer service working group will monitor the LEP program periodically, but not less than annually, to assess the effectiveness and efficiency of the program. Monitoring will include:

- Feedback from LEP clients
- Feedback from staff
- In-house reviews of the current communications needs of LEP clients
- Contact with community-based organizations that provide services to LEP clients

VII. 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 Language Line Services Inc. (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
- Use qualified community volunteers

VIII. 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 Intergovernmental Affairs (IGA) 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. Information on how to receive Language Access services will be added to the Interactive Voice Recognition (IVR) system during customer hold times. Communications staff will participate in the customer service working group and play an active role in improving and expanding language access initiatives.

IX. 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 Chief Customer Officer and the Language Access Coordinator
- Follow up with the impacted customer to provide necessary services
- Retraining for the impacted staff member(s)
- Follow up, if warranted, with written communication from the Commissioner

X. 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 Language Line Services 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
Include language access issues in the customer service working group comprised of customer service, legal, communications, training, human capital and operational staff to evaluate current policies and identify new internal and external training and outreach initiatives	Conduct monthly meetings	Appointed by the Chief Customer Officer under the guidance of the Deputy Commissioner for Strategic Planning and Policy	In progress
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.	Conduct quarterly meetings	Language Access Coordinator	July 2018
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	Launch campaign in June 2018

Train all staff on Local Law 30	Included in annual customer service training	Language Access Coordinator and Deputy Director of Customer Service	Completed by December 2018
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	January 2019
Produce annual language access report	Require language access liaisons to provide monthly data on LEP customer interactions	Language Access Coordinator	January 2019
Update language access plan	Post on website and update content every 3 years	Chief Customer Officer and Language Access Coordinator	July 2021
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	December 2018
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	June 2019
Review RCNY 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	June 2020

Appendix:

A major language access outreach initiative of the Department of Buildings is conducting safety outreach for workers and the public in multiple languages. The [Experience is Not Enough](#) multilingual campaign was designed to emphasize to all construction workers the importance of using proper fall protection, including [harness safety and scaffold safety tips](#). These brochures are made available in multiple languages to ensure that this critical safety information is widely accessible. In addition, a Safety Training campaign was launched in March 2018 to provide information on new training requirements in multiple languages.



**TRABAJADORES:
OBTENGA SUS
CAPACITACION**

**Según el requisito de una nueva ley,
los trabajadores en la gran mayoría de
obras de construcción deben realizar
una capacitación obligatoria
de **10 horas de OSHA**
antes del **1 de marzo de 2018****


**Los empleadores que no cumplan con
esta ley serán multados.**

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de capacitación disponibles, llame al 311
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Proveedores del curso de 10 horas de OSHA

<p>Catholic Charities Community Services 402 East 152nd Street Bronx, NY 10455 347-978-2350 catholiccharitiesnyc.org</p> <p>La Colmena - Community Job Center, Staten Island 774 Port Richmond Avenue Staten Island, NY 10302 718-442 7700 lacolmenanyc.org</p> <p>Man Up 799 Van Siclen Avenue Brooklyn, NY 11207 718-784-0877</p> <p>New Immigrant Community Empowerment (NICE) 71-29 Roosevelt Ave. Jackson Heights, NY 11372 718-205-8796 nynice.org</p>	<p>Northern Manhattan Coalition for Immigrant Rights 5030 Broadway, Suite 639 New York, NY 10034 212-781-0355 www.nmccr.org</p> <p>Proyecto Justicia Laboral/ Worker's Justice Project (WJP) 365 Broadway Brooklyn, NY 11211 347-889-6347 / 718-600-0425 workersjustice.org/</p> <p>Public Housing Communities Brooklyn, NY info@publichousingcommunities.org</p> <p>Urban Upbound 12-15 40th Ave Long Island City, NY 11101 718-571-9479</p>
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Alcaldía de Nueva York

DCP Language Access Plan (2018)

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Language Access Coordinator: Dominick Answini, Assistant General Counsel

Introduction

In order to comply with Local Law No. 30 (2017), the Department of City Planning (“DCP”) has developed a Language Access Plan to detail how language access services are and will be provided and to provide New Yorkers with limited English proficiency (“LEP New Yorkers”) meaningful access to information and the agency’s direct public services. 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 services, and (iii) posting multilingual signage in certain locations about the availability of free interpretation services. 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 citizen; 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 June 26, 2018.

I. 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. DCP reports directly to the Deputy Mayor for Economic Development, and through this office to the Mayor.

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 City Planning Commission ("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.

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, 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. The CPC public hearings are generally held in the Lower Level Concourse, 120 Broadway, New York, New York on alternating Wednesdays at 10:00am.

Other services of the agency related to the Land Use Review Process include:

- Providing opportunities to file applications for land use changes;
- 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.

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. Additional information is provided to the public through the 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.

Technical assistance services are available in the agency'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 specific problems with understanding the Zoning Resolution. Central Intake answers questions regarding the filing and land use application process. 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 agency's broader educational role.

II. Agency Language Access Policy and Goals

The DCP and the CPC place great importance on helping the 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 additional and consistent opportunities to meaningfully participate in the land use review process.

A. Access to Technical Assistance

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. This Language Access Plan seeks to make basic information and assistance available to 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

All members of the public should have the ability to participate in deliberations on land use issues affecting their neighborhoods. In order to effectively participate in a public hearing, the public must have access to written information regarding the subject application, advance notice of the hearing, 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.

The DCP has appointed Dominick Answini (Assistant Counsel) the Language Access Coordinator and he will be responsible for ensuring the DCP's implementation and ongoing compliance with this plan. The DCP will also appoint the Language Bank Liaison who will be responsible for the maintenance of a list of DCP employees with sufficient language skills to serve as translators for LEP New Yorkers ("Language Bank"). The Language Access Coordinator, working with the Language Bank Liaison and 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 VII*. As specified in *Section VI*, 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 II*.

III. 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.

A. Technical Assistance Areas

Demographic Analysis: Technical assistance 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.

Assessing Agency Need: In interviews with the DCP staff, little frequency of LEP contact was reported. The Zoning Help Desk and Central Intake reported no contact with LEP persons in the last 6 months, and the borough offices reported only occasional encounters ranging from several times a month to several times a year. It was reported that all encounters in the last 6 months have been in Spanish.

Nature of Services: The DCP places great importance on helping New Yorkers understand and participate in the city's planning process. The DCP Language Access Plan seeks to further these goals by affording LEP New Yorkers improved access to DCP resources.

Resources: The DCP's current practice is to use the existing Language Bank composed of bilingual staff to interpret and answer questions by LEP persons on an informal basis. While the perception of DCP staff who were interviewed is that the current availability of bilingual speakers, particularly in Spanish, is generally sufficient to meet the need, there is a lack of established record keeping that would help gauge both the need for such services and the DCP's success in delivering past services.

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 to provide translation services for the LEP New Yorkers as well as translation of DCP forms, in the 10 designated citywide languages as well as, on an *ad hoc* basis, other languages not included in the list of designated citywide languages.

B. Land Use Review Process

Demographic Analysis: Given that applications are subject to review by the general public, the service population participating in the review process is drawn from all persons in the city. However, DCP's Population Division, as the agency division responsible for the collection of demographic data, is a powerful resource to analyze segments of the service population most impacted by a DCP-initiative, sister-agency initiative or private application. With this demographic data, the DCP can better serve those segments' language access needs.

Assessing Agency Need: 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.

Nature of Services: The CPC places great importance on receiving input 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.

Resources: 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. Based on current DCP contracts with Geneva Worldwide, Inc., providing on-site interpretation services at public hearings is estimated to cost approximately \$475 per hour per language provided, based on the length of hearing (estimated at 5-10 hours) 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.

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

If special circumstances arise, where for example, a DCP-initiative in a neighborhood where many speakers of certain designated citywide 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:

Demographic Analysis: 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.

Assessing Agency Needs: 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 DCP Press Office also reports that they frequently post on social media in both English and Spanish.

Nature of Services: 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 sources of information, that would allow LEP New Yorkers to understand what is being proposed for plots of land in their neighborhood, in their borough or in the city generally.

Resources: The DCP has historically engaged local and city-wide press outlets, some of which publish in designated citywide languages but accept information from the DCP in English, to disseminate information to communities with a high-proportion of LEP New Yorkers.

IV. Provision of Language Access Services

Much of the Service Provision Plan is already in place, first implemented in 2009 in response to the Mayor's Executive Order No. 120 of July 22, 2008.

A. Frontline Locations/Service Centers (Borough Offices, Zoning Help Desk, Central Intake)

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.

- The primary resource for interpretation is existing DCP staff. An agency "Language Bank" identifies staff members who are available to interpret and translate on a voluntary basis. An existing Language Bank will be updated immediately, and will bolster the existing informal efforts of frontline staff interpretation.
- 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. This contract's resource allocation is regularly monitored and reevaluated based on demand for service. The contract shall be amended so that the DCP will be able to provide via LanguageLine© interpretation in at least 100 languages, both common and esoteric.
- For written correspondence, and in-person translation for example, translation for spoken testimony at a public hearing), the DCP contracts with Geneva Worldwide, Inc.
- Service centers shall be 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 Mandarin, Cantonese and Taiwanese), Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, & Polish), and DCP staff in these locations shall wear Mayor's Office of Operations "I Speak" language identification cards 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.

The DCP has implemented these policies to provide access in top ten designated citywide languages defined by the Mayor's Office in 2017, and will cover additional languages as our resources allow.

B. Basic Information and Instructional Documents

- 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"). This function significantly enhances access to reference information regarding the work of the agency, basic zoning concepts, regulations, and the public review processes.
- DCP has a contract with LanguageLine© for professional translations in the top ten designated citywide languages of basic instructional material, beginning with:
 - Basic information about land use review
 - Basic Information about zoning

- Instructions on how to give non-English testimony.
- A page of the website is dedicated to non-English language material and professionally translated information will accompany an overview of available LEP services.
<http://www1.nyc.gov/site/planning/about/language-access.page>
- These materials are provided according to plain language principles as identified by the Mayor’s Office.
- If financial resources become available, the DCP will evaluate the need for additional professional translation of resources.

C. Emergency Preparedness and Response

The DCP’s emergency preparedness and response plan (the “Continuity of Operations Plan”) does not yet incorporate provisions for language access but the COOP is currently being updated and will incorporate provisions to address language access needs later this year (see *Section VII*).

D. Land Use Review Process

General policies will be 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 must determine 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 persons, 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. Application Information

Application information may be obtained from a variety of sources including: official application files, docket language from the CPC calendar, CPC Reports, oral presentations at CPC review sessions and public hearings, community board meetings, and website descriptions and presentations.

- For all applications, automated translation of the website makes application information more widely accessible, particularly for DCP initiative applications for which a significant amount of plain language description is provided.
- For DCP initiative applications which warrant additional measures to ensure access by LEP New Yorkers, additional project information may be professionally translated and made available on the DCP website. Professional translation will be arranged through a LanguageLine© contract with DoITT. (see *Section VII*)

2. Notice of Public Hearings

- For all applications, automated translation of the website makes public hearing schedules available.
- For applications deemed to warrant additional measures to ensure access by LEP New Yorkers, professionally translated notice can be posted on the website and disseminated through interested community boards.

3. Testimony at Public Hearings

- For all applications, the CPC will accept testimony from LEP New Yorkers in the ten “designated citywide languages” defined by the Mayor’s Office. Non-English testimony can be interpreted at the public hearing when practicable (see *Section VII*) or transcribed from the CPC video recording, translated professionally by Geneva Worldwide, Inc., and provided to the CPC members for consideration.
- Directional signage at public hearing venues will be posted in the top ten designated citywide languages, and instructional information will be made available in these ten languages for LEP New Yorkers wishing to testify.
- 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.

4. Land Use Applications Made by LEP New Yorkers

Interviews with Land Use Review Division staff indicates that there are essentially no applications made where the applicant or applicant’s representative require translation services. The vast majority of applications brought before the DCP are managed by representatives who are all fluent in English. There is no plan to create land use forms in the ten LEP languages but if required by specific circumstances DCP’s Executive Director can direct Geneva Worldwide, Inc. to translate land use application forms into the required language.

V. Training

Certain divisions of the DCP staff shall be trained in the next few months and then on an ongoing basis. Staff will be 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 but the proposed training regimen is as follows:

A. Training of Frontline Staff

Once the Language Bank has been reconstituted, beginning in the 3rd quarter of 2018, the Language Bank Liaison will provide training on these policies and procedures for all staff in public contact positions. Staff will be given Mayor's Office approved "I Speak" cards and trained to assist LEP New Yorkers as well as to access wider interpretation/translation services through DCP's Language Bank, Geneva Worldwide, Inc. and LanguageLine©.

This training will be provided to new employees as part of their orientation.

B. Training of Language Bank Volunteers

As part of the redevelopment of the Language Bank, beginning in the 3rd quarter of 2018, the Language Access Coordinator and Language Bank Liaison will hold an orientation meeting with volunteers to discuss appropriate protocol and guidelines for providing interpretative and translation services.

C. Training of Land Use Review Division Staff

In addition, beginning in the 3rd quarter of 2018, the Land Use Review Division will hold a training session to orient existing staff with new LEP policies, use of signage, and protocols for assisting LEP speakers.

VI. Record Keeping and Evaluation

A. Record Keeping

1. Frontline Interpretation

For all interpretation services by DCP volunteers, staff will be asked to log the encounter via email to the Language Bank Liaison. The log will include the date, time, duration and nature of the encounter, the language used, and any other relevant comments.

For all interpretation provided using LanguageLine© or Geneva Worldwide, Inc. interpreters, the DCP will rely on reports by those companies to monitor usage.

On an annual basis, or if a significant increase in usage is noted, the Language Bank Liaison will report to the Language Access Coordinator 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.

B. Overall Assessment

On an annual basis, the Language Access Coordinator will evaluate 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.

VII. Resource Analysis and Planning

As explained in *Section IV*, the DCP has many available resources with which the agency is able to fulfill its goals and policies regarding language access.

A. Language Bank

Given the education and varied backgrounds of DCP staff the DCP is able to compose a volunteer agency Language Bank to assist in translation services. A form for self-identification will allow volunteers to assess their expertise and comfort level in participating in each of the following LEP services: to in-person/telephonically interpret for frontline service operators; provide translation and quality assurance for translation of technical assistance public documents and public hearing notifications; provide on-site interpretation for 'greeting' and assistance at public hearings; and/or provide interpretation of testimony at public hearings. Requests will be made to registered volunteers on an as-needed basis, with copies of the request sent to the Language Bank Liaison for record keeping. Based on anecdotal evidence and prior experience of front line staff, and prior use of the Language Bank, demand is not expected to be high, but a new tracking system will allow the Language Bank Liaison to monitor demand and usage on an ongoing basis.

B. Telephonic and Document Translation

The DCP's contract with LanguageLine© will continue to be used generally by the frontline desks (each Borough main line, Zoning Help Desk, Central Intake), and accessible to all DCP employees with public contact positions. Staff 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. As noted in Section IV the signage will include directional signage at public hearing venues in the top ten 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 all or 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

The DCP Language Access Coordinator will draft, revise and submit for professional translation in the top ten LEP languages materials that explain:

- a. Basic information about land use review process

- b. Basic Information about Zoning
- c. Instructions on how to give non-English language testimony (following implementation of Supplemental LEP Services, as described below)
- d. Fact Sheet of available Language Services

Prior to posting, Language Bank volunteers will provide quality review of documents translated into the top ten LEP languages to the extent of their capacity to do so to improve the readability and comprehensibility of the materials.

The number of page views in this section will 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, 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 DCP has a contract with Geneva Worldwide, Inc. for the live translation of this testimony if needed.

When filling out a speaker card at a Public Hearing, speakers will continue to be asked to indicate whether they are a Limited English speaker and request 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 LanguageLine© 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.

G. Supplemental LEP Services

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

1. Basic plain language information regarding the application/project will be posted on the DCP website, with translation provided in languages most appropriate for the affected community district(s), as determined by the Executive Director (See Section IV). Language Bank volunteers, if available in the necessary languages, will be asked to provide quality assurance of documents prior to posting.
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, DCP may seek to provide interpretation by utilizing the volunteer Language Bank, Community Boards, or retaining professional interpreters (such as Geneva Worldwide, Inc.). On occasion, volunteer civic groups may continue to provide interpretation services.

VIII. Outreach and Public Awareness of Language Access Services

Following the full implementation of public review and online services, the DCP, mostly through borough staff, will reach out through local community boards to promote the existence of new available resources. This plan shall be published on the DCP website. The public outreach will also include information on how to submit language access complaints to the DCP.

IX. 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 18 (*Appendix A*). Additionally, any complaints with regards to language access or the Languages 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 the DCP Executive Office to the Language Access Coordinator (who can, as applicable, forward the complaint to the Language Bank Liaison). 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 DCP receiving the complaint and copy the Executive Office and the frontline planner (if applicable) on the response to the complaint.

X. Implementation Plan Logistics

The Language Access Plan will be implemented as per the following schedule and this implementation shall be coordinated by the 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. Updating of the Language Bank

The DCP Language Access Coordinator and the Language Bank Liaison will immediately implement plans to update the DCP's volunteer Language Bank. Such update shall be completed in the 3rd quarter of 2018.

On an annual basis, the Language Bank Liaison will engage in recruiting new volunteers and update the bank as necessary.

B. Telephonic Translation

The DCP Language Access Coordinator will maintain the contract for telephonic interpretation that has been in existence since 2009.

C. Signage for Frontline Locations

Signage is and has been posted at the City Planning Commission hearing room at 120 Broadway in the top ten "designated citywide languages" instructing the public that a translation services are available. The signage shall be reviewed and revised by the Language Access Coordinator and DCP Land Use Review Division Staff and such review and update shall be completed in the 3rd quarter of 2018.

D. Automated Translation of DCP and CPC Websites

The websites are currently translated and will continue to be translated for the foreseeable future.

E. Language Services Webpage on the DCP Website

This page of the DCP website was updated in July of 2018 and shall be further updated by the Language Access Coordinator, in conjunction with Geneva Worldwide, Inc. of LanguageLine© with summary materials which have been translated in the top ten LEP languages by the end of the 3rd quarter 2018.

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, the Language Bank Liaison and the DCP's Land Use Review Division staff will coordinate the provision of these services.

G. Emergency Response

The "Continuity of Operations Plan", which is DCP's emergency response plan will incorporate provisions for language access when it is updated in the 4th quarter of 2018. The COOP shall be updated by the DCP Agency Chief Contract Officer and Senior Operations Manager.

Appendix: Locations of Department of City Planning Service Centers

LANGUAGE ACCESS COORDINATOR

Dominick Answini
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

Agency Language Access Implementation Plan (LAIP) 2018

Department of Citywide Administrative Services



David N. Dinkins Municipal Building – Department of Citywide Administrative Services Headquarters (DCAS).

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 over fifty (50) DCAS-managed buildings citywide. DCAS is deeply committed to ensuring these public-facing services accommodate the vibrant, diverse array of New Yorkers and their needs.

In-Person and Call-in Services

The VLB (Volunteer Language Bank) and OTP (Over-the-Phone) services will be available at points where DCAS meets the public to provide language access to persons with limited English proficiency (LEP) whenever feasible. DCAS has several CTACs (Citywide Testing & Application Centers) throughout the five boroughs of New York City. CTACs offer the public the opportunity to apply, schedule and take exams for civil service positions. In addition, there are two locations where the public can apply and get information on exam schedules and status. The locations of the greatest points of contact for the agency are listed below:

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, 14th Floor New York, NY	Citywide Human Capital
Civil Service Certifications Walk-In Window	1 Centre Street, 21st Floor New York, NY	Citywide Human Capital
Security Posts in DCAS Buildings	Multiple locations citywide	Administration

II. Language Access Policy and Goals

The goal of the Department of Citywide Administrative Services' Language Access Plan is to ensure the public has access to our exams and services regardless of their English proficiency. In formulating the Language Access Implementation Plan (LAIP), DCAS established the following guiding principles for the plan to address the public's needs, now and in the future. As an agency we aim to:

1. Communicate effectively with all DCAS customers;
2. Ensure persons with LEPs are accommodated and respected;
3. Provide translation and interpretation services to the public seeking core DCAS services;

This document, the DCAS Language Access Plan (LAP), addresses Local Law 30 and outlines how DCAS will accommodate persons with limited English proficiency (LEP). As the City's population continues to evolve and diversify, DCAS will review its plan annually to ensure it supports the changing needs of the city.

The Department of Citywide Administrative Services will ensure its LAP supports the community we serve. We have identified several ways in which to meet this objective:

1. Develop a survey to identify how many DCAS employees speak languages other than English to establish our Volunteer Language Bank (VLB);
2. Train frontline workers and managers on language access policies and procedures;
3. Post informational signage about the availability of free interpretation services in areas frequented by the public, such as our computer testing centers and City stores;
4. Provide interpretation and translation services, including the use of telephonic services for the top languages as well as other languages as needed.

III. Limited English Proficiency Population Assessment (LEP)

In creating its LAP, DCAS applied the Four Factor Analysis created by the US Department of Justice (DOJ);

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

The population that DCAS serves is reflective of the general population of New York City. In evaluating its target audience, DCAS drew from population studies produced by the Department of City Planning (DCP), whose studies identify the top languages spoken in the City other than English. These languages are Spanish, Chinese, Russian, Korean, Italian, and Haitian Creole, Arabic, Urdu, French and Polish.

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

DCAS plans on improving its processes to ensure we capture and maintain detailed information about persons with LEP seeking assistance in our customer service areas. This will be achieved by establishing a liaison in DCAS point of contact areas who will report back to the Language Access Coordinator (LAC) with relevant data and information.

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

Because DCAS administers testing for New York City civil service titles, it is imperative that we can communicate with potential candidates who are interested in learning more about a career with New York City.

Additionally, on occasion, DCAS interacts with members of the general public who may be interested in buying, selling, and leasing property from the City of New York. Having these resources available will allow DCAS to interact effectively with a wider audience.

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

DCAS will offer translation services, and when feasible, over -the-phone interpretation services through the citywide service contract managed by the Department of Information Technology & Telecommunications (DOITT). The contracted services, provided by the vendor Geneva Worldwide Translation Services will be used when the VLB is unable to fulfill the service requested.

DCAS will use several data sources to assess our language access needs. These sources include: U.S Census Bureau's most recent American Community Surveys, and 311 data on language access requests.

DCAS will begin to assess which of these languages are requested the most in areas where we service the public. We will accomplish this assessment by ensuring that employees who service public areas are reporting requests for translation and interpretations to the LAC on a monthly basis. The LAC will in turn gather the stats to form a complete assessment.

Some public-facing services, however, will not be eligible for translation or interpretation because of the nature of the service. These exemptions include:

- **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.

As the city continues to grow DCAS will adjust the plan to ensure the most commonly spoken languages remain the focus of our efforts.

IV. Provision of Language Services

The Agency LAC, 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 language access plan. The LAC will work with DCAS's lines of services (LOS) to ensure the overall success of the plan and liaise with the Mayor's Office of Immigrant Affairs (MOIA) on citywide language access issues and reporting.

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

In the event of an emergency, DCAS will employ the help of its volunteers in the language bank to help disseminate important information. In instances where the emergency does not allow for this option, DCAS will use Ever bridge, the citywide mass communication company to provide emergency group communications to the LEPs.

In the event of public hearings hosted by DCAS, notices will be amended to notify members of the public that language access services will be made available upon request.

DCAS will utilize three tools to deliver language access services:

1. **Volunteer Language Bank (VLB)** – Using guidelines established by the Mayor's Office of Immigrant Affairs, DCAS will develop a network of multi-lingual employees throughout the agency willing to volunteer their services. The VLB will be accessible to frontline employees to provide in-house interpretation services.
2. **Translation and Over-The-Phone (OTP) Interpretation Services** – DCAS will offer translation and over- the-phone interpretation services in the designated Citywide languages through the Citywide service contract managed by the DOITT and the VLB.
3. **Translate Most Commonly Distributed Materials (MCD)**- DCAS will continue to update its MCD to be reflective of the citywide languages.

V. Training

The LAC working with DCAS Senior Management and areas where language access services are requested will be responsible for administering the agency's implementation and training of the plan. The LAC 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 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

Language access training will be given 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 (VLB and OTP), how to work with interpreters, cultural sensitivity, and how to track and report language access interactions.

Training will begin in the third quarter of CY 2018. 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 will attend the training.

DCAS will update its new hire orientation to make employees aware of its language access plan, including encouraging new employees to join the Volunteer Language Bank if they are qualified. They as well current employees be advised to review the complete Language Access Plan, which is available online and on the DCAS intranet.

VI. Recordkeeping and Evaluation

DCAS will measure the performance and compliance of the plan by tracking point-of-contact reports as well as VLB, OTP and 311 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
 - Over the phone through VLB services
 - In person through OTP services
 - In person through VLB services

- **# of documents translated**
 - Language Summary
 - Languages accessed
 - % of translations by language
 - % of interpretations by language

- **311 Data**
 - # of language access complaints received via 311
 - # of requests for language access services via 311
 - record of how complaints were handled

Geneva Worldwide Translation Services will perform quality assurance reviews of translated documents as standard practice. DCAS plans on incorporating quarterly in-person or conference meetings with the vendor to discuss the reviews. In addition, DCAS will employ the VLB to perform internal reviews of translated documents. DCAS will also utilize Citywide translator certification models once available.

VII. Resource Analysis and Planning

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 Translation Services Poster, and various guidance documents.
- Citywide Services: DCAS will obtain translation and interpretation contracting services through a contract held by the Department of Information and Telecommunications (vendor: Geneva Worldwide Translation Services). In addition, DCAS will utilize Citywide training models when available.
- DCAS Staff: DCAS will draw from its talented, diverse workforce to establish and maintain the VLB.

VIII. Outreach and Public Awareness of Language Access Services

The Language Access Coordinator will attend outreach events relating to services provided by DCAS where they will interact with elected officials, and community organizations to gather important information about the changing needs of the LEP community. These meetings and events provide the perfect platform for DCAS to learn about changes in demographics and needs of the population.

DCAS will update its website to include translated documents we commonly provide to members of the public.

Outreach and public awareness is further enhanced by the translation feature available on our website. Visitors are able to read all the information on the site in the language they are most comfortable with.

IX. Language Access Complaints

DCAS has been fortunate to not have received any language access complaints in 2017. Language access requests or complaints are directed to the Language Access Coordinator via our internal website, MOIA and/or 311.

X. Implementation Plan Logistics

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

Document Translation

DCAS will utilize the services of Geneva Worldwide Translation Services, using plain language principles, to translate materials most commonly distributed to members of the public. Printed materials will be readily available in all the identified citywide languages. The documents will be available at relevant walk-in centers and posted online. Essential documents to be translated in CY 2018 are:

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

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

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.

CY 2018	OTP translation services will be available to all frontline staff
CY 2018	Translation services signage posted at all public points-of-contact
CY 2018	Begin LAP training for frontline staff
CY 2018	Identify and translate essential documents
CY 2018	Launch VLB for all frontline staff
CY 2018	Report language access data in the Mayor's Management Report
CY 2019	Deliver cultural competency training based on Citywide model
CY 2019	DCAS conducts LAP analysis for internal use

Website Translation

DCAS will post essential translated documents on its website, www.nyc.gov/dcas.

Name and title of Language Access Coordinator:

Mary Cooley, Assistant Commissioner, Legislative Affairs

I. Agency mission and background

The Department of Consumer Affairs (DCA) protects and enhances the daily economic lives of New Yorkers to help create thriving communities. DCA licenses and regulates more than 81,000 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. DCA also provides mediation and restitution for consumer complaints. Through the Office of Labor Policy and Standards, the agency enforces various workplace laws, including Paid Sick Leave, by investigating complaints, conducting proactive investigations and recovering restitution for workers. DCA'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 Financial Empowerment Centers around the City and through other small-scale programs, increasing access to safe and affordable financial products and services, and encouraging the use of NYC Free Tax Prep sites where eligible New Yorkers can file their taxes for free and claim valuable tax credits.

Direct Services

DCA:

- **Licenses** more than 81,000 businesses in more than 50 industries and operates the DCA Licensing Center at 42 Broadway in Manhattan. DCA also has Licensing staff at the NYC Small Business Support Center in Jamaica, Queens. Staff at the Centers also administer permits on behalf of the NYC Department of Health and Mental Hygiene (DOHMH).
- **Conducts field inspections** of businesses citywide to ensure compliance with laws protecting consumers, such as the Weights and Measures, Consumer Protection, and industry-specific Licensing laws.
- **Collects fines** from businesses that violate the Weights and Measures, Consumer Protection, Licensing, and City labor laws.
- **Mediates complaints** filed with the Agency by consumers against store owners or merchants.
- **Conducts investigations** of businesses for compliance with Consumer Protection and Licensing laws, as well as workplace laws, including Paid Sick Leave, Commuter Benefits, Freelance Isn't Free Act, and Fair Workweek. DCA **litigates or settles** any legal matters which may result.
- **Educates consumers, workers, and businesses** about their rights and responsibilities through the press, public awareness campaigns, DCA website nyc.gov/dca and social

media channels, publications, e-newsletter, speaking engagements, trainings, and seminars.

- **Contracts with neighborhood not-for-profit organizations** to provide free one-on-one financial counseling and coaching through NYC Financial Empowerment Centers, as well as free tax filing services for eligible New Yorkers through NYC Free Tax Prep.

II. Agency language access policy and goals

DCA believes that limited English proficiency (LEP) should not be a hindrance to accessing the services and information the agency provides. Without interpretation and translation, consumers would not be able to file complaints or know their basic consumer rights; business owners would not be able to navigate the rules and regulations that govern commerce in New York City, nor would they be able to apply, on their own, for a license to run a compliant establishment; workers would not be able to make inquiries and complaints to OLPS; and employers would not understand their responsibilities under the law. DCA's language access implementation plan is intended to help staff provide excellent customer service. It reinforces existing language access protocols within the Agency and operationalizes new protocols to improve the Agency's language-assisted services.

DCA has:

- Designated an official Language Access Coordinator for the Agency
- Maintained an internal language bank of volunteer staff interpreters and translation reviewers
- Posted language access posters and desktop signage in customer service areas
- Created a translated handout for use by inspectors in the field
- Contracted with Language Line to provide over-the-phone interpretation in up to 170 languages
- Contracted with Geneva Worldwide to provide document translation
- Contracted with Accurate Communications to provide in-person American Sign Language interpretation and in-person interpretation in up to 250 languages
- Translated educational materials targeted to consumers, workers, and businesses
- Maintained information about language access service usage

DCA will:

- Update its Agencywide language access protocols to reinforce use of contracted interpretation and document translation services
- Develop a protocol for use of volunteer staff interpreters and translation reviewers
- Increase staff training and update training materials
- Convene more regularly its Language Access Team consisting of staff across Divisions
- Integrate queries about language access services into customer service surveys

- Determine if new data collection and retention methods are needed to improve internal assessment of language access services
- Audit language access signage

III. 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

Factors 1-3

Historically, due to customer demand and Executive Order 120, the languages primarily used for translation and interpretation at DCA are:

- Spanish
- Chinese
(*Translation: Traditional and/or Simplified; Interpretation: Cantonese and Mandarin*)
- Korean
- Russian
- Haitian Creole
- Arabic
- Bengali

Recently, due to OLPS outreach to special populations and Local Law 30 of 2017 (LL 30 of 2017), DCA has been translating commonly distributed materials in up to 10 languages, with identified new language needs that include:

- French
- Hindi
- Nepali
- Polish
- Portuguese
- Punjabi
- Tagalog
- Urdu

Both historically and recently, consumer and worker advocacy groups and business associations in immigrant communities have been vital resources and distribution partners for DCA. From gathering complaints to hosting educational training seminars, DCA’s partners have helped inform language needs for translation and interpretation and provided outlets for translated Agency materials.

Topline Overview

Source	Language Need
Language Line Over-the-Phone Interpretation (DCA)	Predominant language need is Spanish, followed by Mandarin, Bengali, Arabic, Russian, Korean, Cantonese, Hindi, Italian, and French. Across CY2014, CY2015, and CY2016, Language Line was used 3,072, 3,832, and 3,453 times, respectively. In all years, Spanish comprised an average of 63% of telephonic interpretation.
Language Preference Law <i>Applicants for premises-based business licenses have the option to indicate a language preference for inspections on the application. Less than 10 percent choose to indicate a preference.</i>	Top choices were Spanish, Mandarin, Korean, Cantonese, Arabic, Bengali, and Urdu.
Language Line Over-the-Phone Interpretation (NYC Financial Empowerment Centers) <i>The Centers, which OFE runs in partnership with City contractors (community-based organizations), provide free one-on-one financial counseling and coaching.</i>	In FY2016 and FY2017, approximately 14 percent of clients spoke Spanish during counseling sessions.

Factor 4

DCA had the following contracts for language access services for FY18:

- Accurate Communication (for sign language interpretation and in-person interpretation): \$14,546.40
- Language Line Services (for telephone interpretation): \$20,000.00
- Geneva Worldwide (for written translation): \$60,510.00

DCA uses Language Line to provide over-the-phone interpretation in up to 170 languages. Special dual handset phones are in public areas to aid with interpretation.

DCA primarily uses Geneva Worldwide for document translation. When needed, DCA will use other vendors for document translation.

To comply with LL 30 of 2017 and to continue to meet the needs of DCA's diverse customers, DCA will:

- Establish criteria for “essential documents” (i.e., most commonly distributed; legally required for business display/distribution) and translate them for consumers, workers, and businesses using a professional service, with internal review by fluent volunteer staff
- Provide on-site interpretation at public events via professional service, as needed
- Evaluate and update language access services on a consistent schedule based on staff and customer feedback

IV. Provision of language access services

DCA has a single Language Access Coordinator who will facilitate the implementation of the language access plan Agencywide. The Language Access Coordinator will:

- Ensure that the plan is revised and/or updated when necessary
- Track and report language access numbers
- Coordinate the Language Access Team meetings
- Supervise the language access volunteer bank
- Facilitate requests for document translation if/as needed beyond established protocols for document translation

Division Directors will assist by monitoring and ensuring their staff complies with the directives and protocols of the new plan, as well as alerting the Language Access Coordinator about any issues with service provision; for example, staff issues with over-the-phone interpretation, need for updated signage or materials.

Document Translation

- DCA will use criteria for “essential publications” (e.g., most commonly distributed) to identify, prioritize, and translate them. To aid this effort, DCA is auditing materials on the DCA website nyc.gov/dca plus printed materials to determine their positions in a hierarchy for translation purposes. Publications not considered “essential” to serve the Agency's customers (businesses, workers, consumers) will not be translated at this time.
- The hierarchy for the translation of “essential documents” will be based on the criteria below, in descending order:
 - Documents that DCA is required to produce pursuant to the law
 - Documents that are essential to the implementation of the laws DCA enforces

- Most commonly distributed documents, irrespective of requirements in the law or whether they are connected to the implementation of a new or important law
- After the conclusion of the auditing of our materials, “essential documents” may also include settlement letters, hearing notifications, and forms and letters related to license applications.
- DCA will confirm which essential publications and documents are translated already and also provide a schedule for translations that are needed based on established criteria. Prioritization in schedule will take into account the importance of the information to LEP customers and the consequences of lack of translation. Cost to Agency, including project management resources and availability of funds, will be a factor, as well.

Website Translation

DCA’s website nyc.gov/dca is supported by NYC.gov and features Google Translate functionality for web page content. DCA had coordinated translation and posting of PDFs in languages other than English.

Protocols

- For public-facing materials, e.g., publications, forms, etc., DCA Communications & Marketing reviews content for plain language before submitting files for translation.
- DCA Communications & Marketing coordinates translation of all public-facing materials with a desktop publishing (design) component—advertising; publications; forms.
- DCA Procurement coordinates translation and/or transcription of materials—completed complaint forms; submitted testimony; published ads—that require certification for submission as case evidence.
- DCA has a contract with Geneva Worldwide for document translation. When needed, due to contract capacity or inability to execute job per scope of work, DCA will solicit alternative translation services. On rare occasions, this may include contracting with community-based organizations that serve the target audience to make sure that translations reflect local knowledge and are easy to understand.
- DCA Communications & Marketing shares translated materials with internal reviewers who are fluent in languages to proofread. DCA shares any feedback from internal reviewers with the translation service to reconcile final translations before printing/posting materials.

Interpretation

- Over-the-phone interpretation in up to 170 languages is available at DCA locations where staff serves the public, including 42 Broadway in Manhattan, Testing Station in Brooklyn, NYC Small Business Support Center in Queens. Special dual handset telephones are available so staff and customers can communicate with an interpreter.

- Enforcement follows the Language Preference Law Inspection Protocol during field inspections. In conjunction with the Language Access Coordinator, Enforcement will monitor and update the Inspection Protocol as needed.
- DCA includes information about requesting interpretation in Notices of Public Hearings, including rules hearings.
- Current DCA frontline staff will undergo refresher training on the use of Language Line in the third quarter of 2018, and training will continue on an annual schedule. New staff will be briefed on language access by the Human Capital Division and Language Access Coordinator during orientation; training will be conducted by respective Division Directors.
- Recruitment of staff volunteers to assist with on-site interpretation will be ongoing. The Agency will host a recognition and appreciation event annually for language access bank volunteers.
- Over-the-phone interpretation in up to 170 languages is also available at NYC Financial Empowerment Centers, which OFE runs in partnership with contractors.
- DCA has a contract with Accurate Communications for in-person American Sign Language interpretation and in-person interpretation in up to 250 languages.

Protocols

When a customer indicates the need for an interpreter, DCA 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, DCA will produce language identification cards for Division Directors to give staff.

If staff encounters difficulties identifying customers' primary language, they will engage Language Line who should be able to assist. If staff exhausts all options to try to provide language assistance, staff should contact the Language Access Coordinator and copy the relevant Division Director.

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.
3. **You may ask a DCA staff member to assist with on-site interpretation on a voluntary basis; however, engage Language Line first before asking a staff member to interpret.** Please check with staff member's Division Director.

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. **Bring any language issues that arise to the attention of your Division Director who will alert the Language Access Coordinator.**
6. **If a document, for example a complaint form completed in a language other than English, requires translation and/or transcription, please alert DCA Procurement and copy your Division Director and the Language Access Coordinator.**
7. **For special events DCA is hosting such as public hearings or public events where interpretation services are required, please alert DCA Procurement and copy your Division Director and the Language Access Coordinator at least two weeks in advance of the event so that on-site interpretation services may be procured.** If DCA is co-hosting an event with an organization or group and interpretation is needed, fluent DCA staff may offer to provide outreach presentations in a language other than English. . If no fluent DCA staff is available and the host organization is unable to provide interpretation, DCA staff should alert DCA Procurement as outlined above.

Notification of free interpretation signage

- Wall posters and desktop signage promoting free interpretation assistance are in high traffic areas where DCA serves the public, including:
 - DCA 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
 - Weights and Measures Testing Station in Brooklyn

Wall poster states:

We will help you in the language you prefer.
Ask for free interpretation assistance at Reception.

Languages include Spanish, Arabic, Bengali, Simplified Chinese, Traditional Chinese, Haitian Creole, Korean, Russian.

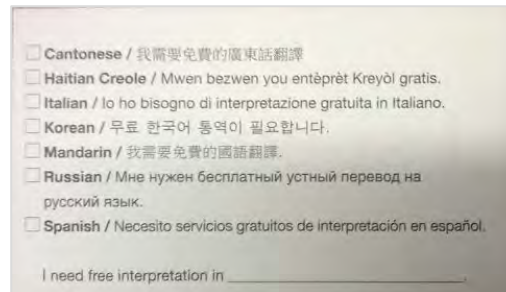
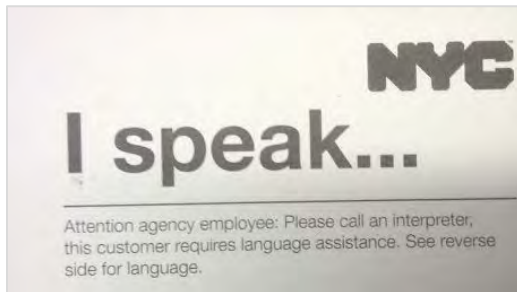
Inspector handout states:

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.

Languages include Arabic, Bengali, Cantonese, Farsi, French, Haitian Creole, Hebrew, Hindi, Italian, Japanese, Korean, Mandarin, Polish, Portuguese, Punjabi, Russian, Spanish, Thai, Urdu, Vietnamese.

See Exhibits at end.

- DCA will create language identification cards for frontline staff similar to the “I speak...” cards developed to assist LEP customers.



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 and the DCA website nyc.gov/dca and social media channels.
 - NYC.gov features web page translation functionality.
 - 311 can provide assistance in up to 170 languages via Language Line.
 - Also, DCA’s main number—published in the Green Book—will feature a recorded message in the event of an emergency.

V. Training

- A copy of the new language access implementation plan will be available to all DCA staff via the Agency’s intranet. The Language Access Coordinator and Division Directors shall maintain a hard copy of the plan in their respective areas for quick reference.
- The Language Access Coordinator will review the language access implementation plan with Division Directors.
- The Language Access Coordinator will develop a training module in consultation with Division leadership to address frontline staff interactions with LEP customers. This training may also include input from MOIA and cultural sensitivity information, as well.

- During new hire orientation, the Training and Employee Relations Specialist and the Language Access Coordinator will provide initial introduction to language access resources for staff who will be using language-assisted services in their respective divisions.
- Subsequent training will be provided by Division Directors and/or the Language Access Coordinator for job-specific responsibilities.
- Staff training will be scheduled at least annually and by request from Division Directors using the training module.
- Training will include, but not be limited to, the following topics:
 - How to Engage LEP Customers and Assess Their Language Needs
 - How to Use Language Line Services
 - How to Record Language Line and Language Access Information
 - Criteria for Document Translation

VI. Record keeping and evaluation

DCA 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 are in eProcurement, including estimate and final invoice.
- The Language Access Coordinator will review and evaluate language access data and information on a quarterly basis, including a review of qualitative feedback from Division Directors. Assessment of this data 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 issues. The Language Access Coordinator will forward reports quarterly to Senior Leadership for review.
- The Language Access Coordinator will maintain information for use in outreach, press, FOIL inquiries, etc. For quality assurance purposes, DCA will explore obtaining transcripts of conversations facilitated using Language Line. Such transcripts can be used to guarantee that DCA staff are taking appropriate actions and have a record of the information provided by customers in their own words.
- To improve record keeping and evaluation, DCA will explore integrating requests for interpretation and document translation into Accela* during data entry associated with records, including license applications, complaints, inspections, etc.

Accela is the software that DCA uses to provide online transactional services—license application and renewal, complaints, cure, fine and fee payment, scheduling—and to manage workflow.

VII. Resource analysis and planning

- The Language Access Coordinator will work with DCA's Human Capital Division to continue to explore expanding job titles to include language ability in the preferred job skills category for *non-Civil Service titles*.
- DCA's Human Capital Division will collaborate with Division Directors seeking to hire staff at DCA to make certain that potential candidates are notified of DCA's and the City's commitment to language access for positions interacting with the public.
- DCA's Finance Division will coordinate with the Office of Management and Budget to secure a budget line for the Language Access Coordinator (e.g., new needs request). If additional funds become available, the Language Access Coordinator in consultation with Senior Leadership and Communications & Marketing will allocate funds strategically, with new needs being priority.
- Staff will first use professional services for interpretation and document translation (currently Language Line, Accurate Communications, and Geneva Worldwide). If professional services cannot assist LEP customers or meet scope of work, staff will alert the Language Access Coordinator and copy the relevant Division Director. DCA may contact a community-based organization that serves the target population to assist with translation or interpretation. Additionally, if necessary, DCA may contact the relevant consulate or embassy office to assist.
- DCA's Procurement Division will work to maintain, expand, and renew contracts for over-the-phone interpretation, document translation, and on-site/in-person interpretation.
- The Language Access Coordinator, DCA's Finance Division, and DCA's Division of Technology and Strategic Solutions (DoTTS) will assess the feasibility of translating license application tests, including for computerized testing, and making content in online transactional services available in languages other than English.
- DCA will explore procuring a kiosk for the Licensing Center at 42 Broadway and the NYC Small Business Support Center in Jamaica, Queens where customers would be able to search for publications and documents in their preferred language and print them for free.

VIII. Outreach and public awareness of language access services

- DCA will advertise the availability of language access services on its website nyc.gov/dca, via social media, in press releases and public materials. Staff who do outreach presentations will include general information about the availability of language access services at the Department.
- DCA public awareness campaigns and major initiatives are, and will continue to be, translated into multiple languages.
- DCA will continue to ask stakeholders and partners if translation or interpretation is needed to serve target populations. Fluent DCA staff may deliver outreach presentations in their native language. If no fluent DCA staff is available and the host

organization is unable to provide an interpreter, DCA will procure professional interpretation services. DCA will continue to distribute translated materials to support outreach efforts to target populations.

IX. Language Access complaints

- DCA’s Language Access Coordinator will receive, track, and respond to complaints about language access via 311 and social media.
- When DCA conducts customer satisfaction surveys, a question will probe the customer’s experience with language access services at DCA.
- The Language Access Coordinator will review surveys and complaints and, when necessary, update the implementation plan to address issues.

How members of public can submit language access complaints, questions, and requests	Agency 311 Data (CY 2017)	Description of how complaints/requests were addressed
Members of the public may submit language access complaints, questions, and requests through DCA’s website, via DCA’s social media, and through 311.	# of language access complaints received via 311: 0	N/A
	# of requests for language access services via 311: 0	N/A DCA initiates outreach to Language Line for interpretation assistance when a call is transferred by 311 to DCA. See Agency metrics for language access service provision.

X. Implementation plan logistics

- The Language Access Coordinator will hold quarterly Language Access Team meetings with representatives of Divisions with frontline staff who deal with the public on a regular basis. These meetings will address the status of the new plan’s implementation, as well as daily operational concerns and issues regarding language access.
- In order to provide language access services for issuing a license, permit, or registration by July 1, 2020, the Language Access Team will work closely with the Licensing, Communications & Marketing, and General Counsel Divisions to identify license application materials for translation based on established criteria for essential documents. These documents may include the Basic License Application and required forms.

- The Language Access Coordinator may update the language access plan, as needed, based on quarterly Division reports. If necessary, updates can be made more frequently to ensure immediate compliance.
- Annual reporting will include an assessment of the language access plan, which will include consultation with the Language Access Team and reports from Division Directors regarding usage of language access services.
- The Language Access Coordinator will ensure copies of an up-to-date plan are readily available to the public upon request and strategically displayed on DCA’s website and in public areas.

Goals

Language Access Goal	Milestones	Responsible Staff	Deadline
Audit signage in public areas	<ul style="list-style-type: none"> • Audit all Agency signage • Determine if signage must be updated, removed, or added 	<ul style="list-style-type: none"> • Language Access Coordinator • Language Access Team 	July 1, 2018
Establish criteria for essential publications and documents and create schedule for translation, if/as needed	<ul style="list-style-type: none"> • Audit all publications posted on DCA’s website and used in outreach and education • Establish criteria • Create translation schedule, taking into account available funds and urgency of information for LEP population 	<ul style="list-style-type: none"> • Language Access Coordinator • Language Access Team 	May 1, 2018
Advertise the availability of language access services in public communications	<ul style="list-style-type: none"> • Continue to feature translation functionality on DCA website nyc.gov/dca • Advertise the availability of language access services in outreach presentations, press releases, event flyers, and other appropriate communications 	<ul style="list-style-type: none"> • Language Access Coordinator • Communications & Marketing • External Affairs 	July 1, 2018
Provide enhanced language access services for issuing a license, permit, or registration	<ul style="list-style-type: none"> • Continue to provide free interpretation assistance at DCA Licensing Center and NYC Small Business Support Center • Identify, prioritize, and translate essential license application materials based on established criteria 	<ul style="list-style-type: none"> • Language Access Coordinator • Licensing • General Counsel • Communications & Marketing 	July 1, 2020
Update Agency record keeping protocol	<ul style="list-style-type: none"> • Review record and data retention with DCA Divisions to determine if improvements are necessary • Develop template for staff to track use of language access services 	<ul style="list-style-type: none"> • Language Access Coordinator • Licensing • Enforcement • DOTSS 	July 1, 2018

DCA Language Access Implementation Plan

Update staff training module	<ul style="list-style-type: none"> • Review existing training materials for DCA staff and update as necessary • Develop annual refresher training program 	<ul style="list-style-type: none"> • Language Access Coordinator • Administration 	July 1, 2018
Maintain internal staff language bank and develop protocol for use of language bank	<ul style="list-style-type: none"> • Conduct survey of DCA staff and update list of staff who will volunteer for the language bank • Work with Division Directors to develop protocol for appropriate use of Agency staff for language access services 	<ul style="list-style-type: none"> • Language Access Coordinator • Language Access Team 	July 1, 2018

Exhibits

Wall Poster



The poster features the NYC Consumer Affairs logo at the top left. Below the logo, there are ten rows of text, each representing a different language. Each row is separated by a horizontal line. The languages listed are English, Spanish, Arabic, Bengali, Simplified Chinese, Traditional Chinese, Haitian Creole, Italian, Korean, and Russian. The text in each row provides information about free interpretation services available at the reception area.

Language	Text
English	We will help you in the language you prefer. Ask for free interpretation assistance at Reception.
Spanish	Le ayudaremos en el idioma que prefiera. Solicite asistencia de interpretación sin costo en la Recepción.
Arabic	سنساعدك باللغة التي تفضلها. اطلب مساعدة للترجمة الفورية مجاناً من مكتب الاستقبال.
Bengali	আমরা আপনার পছন্দের ভাষায় আপনাকে সাহায্য করবো। রিসেপশন-এ বিনামূল্যে আপনার পছন্দের ভাষায় ব্যাখ্যা সহায়তার জন্য বলুন।
Simplified Chinese	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。
Traditional Chinese	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。
Haitian Creole	N ap ede ou nan lang ou pito a. Mande èd entèpretasyon gratis nan Biwo Resepsyon an.
Italian	Vi aiuteremo nella vostra lingua preferita. Chiedete l'assistenza gratuita di un interprete alla reception.
Korean	원하시는 언어 서비스를 제공해 드립니다. 접수처에서 무료 통역 서비스를 요청하십시오.
Russian	Мы можем предоставить вам помощь на языке, который вы предпочитаете. Для получения бесплатных услуг перевода обращайтесь в регистратуру (Reception).

Inspector Handout



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>Arabic  عربي</p> <p>مرحباً أنا مفتش من إدارة المدينة لعلاقات المستهلك. الرجاء الإشارة الي لغتك و سأصل بمترجم للتفتيش. خدمة مساعدة اللغة مجانية.</p>	<p>Korean  한국어</p> <p>안녕하세요, 저는 시에서 운영하는 소비자 보호위원회 소속 조사원입니다. 본인의 사용가능한 언어를 말씀해주시면 조사절차를 위해 통역사에게 연락을 취하도록 하겠습니다. 통역서비스는 무료입니다.</p>
<p>Bengali  বাংলা</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>Mandarin  國語</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>Cantonese  廣東話</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>Polish  Polski</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>Farsi  فارسی</p> <p>سلام، من بازرسی 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>Portuguese  Português</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>French  Français</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>Punjabi  ਪੰਜਾਬੀ</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>Haitian Creole  Kreyòl</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 èd nan lang ki gratis.</p>	<p>Russian  Русский</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>Hebrew  עברית</p> <p>שלום, אני מבקר משטח מחלקת הצרכנות בעירייה. אודה לכם אם תוכלו להצביע על השפה שלכם כדי שאוכל לקרוא למתורגמן לצורך הביקורת. השימוש במתורגמן אינו כרוך בתשלום.</p>	<p>Spanish  Español</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>Hindi  हिंदी</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 निःशुल्क है।</p>	<p>Thai  ไทย</p> <p>สวัสดีครับ ข้าพเจ้าเป็นผู้ตรวจราชการจากแผนกผู้บริโภครักษาพันธ์ของเทศบาลนครและข้าพเจ้าจะโทรหาคณะที่ติดต่อสำนักงานที่บริการสืบสวนนี้ การใช้งานนี้ไม่คิดค่าบริการ</p>
<p>Italian  Italiano</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>Urdu  اردو</p> <p>ہیلو، میں شہر کے محکمہ امور صارفین کا ایک افسر ہوں۔ برائے مہربانی اپنی زبان کی طرف اشارہ کیجئے، اور میں تفتیش کیلئے ایک مترجم کو بلاؤں گا۔ زبان کی مدد مفت ہے۔</p>
<p>Japanese  日本語</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>Vietnamese  Tiếng Việt</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>

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New York City Department of Correction Language Access Implementation Plan (LAIP)

As of March 2018, Diane Murray Ward was named the Language Access Coordinator for the New York City Department of Correction.

I. Agency Mission and Background: "As part of the criminal justice system, the New York City Department of Correction (hereafter DOC) is dedicated to enhancing public safety by maintaining a safe and secure environment for our staff, while providing inmates with the tools and opportunities they need to successfully re-enter their communities."

The DOC is a detention system providing for the care, custody and control of individuals (hereafter population) which includes individuals either awaiting the disposition of their case or convicted of crimes whereupon sentenced to one year or less, state ready prisoners and parole violators. Our daily population approximates 9, 133 individuals. We operate two borough-based hospital prison wards, three borough facilities and nine facilities located on Rikers Island. Direct services to our population include but are not limited to rules and regulations detailing behavioral expectations, counseling services, mandated programs (e.g.regularly scheduled Law Library access) and medical services. Post-release programs and services developed to thwart recidivism have been enshrined within our operational systems.

Rikers Island hosts approximately 1, 000 visitors daily. The public's engagement with the DOC commences with our multi-lingual web-site providing general information including facility locations, travel instructions, access hours, appropriate attire, bail, commissary requirements, mailing instructions, and restricted items.

II. Agency Language Access Policy and Goals

Policy: Existing policy requires facilities promulgate rosters of multi-lingual staff. Rosters are disseminated quarterly to the Language Liaison with access to our Central Operation Desk (COD) which provides 24- hour inter-agency communication for all commands. The DOC has historically and continuously provides Limited English Proficient (LEP) persons language access. Fortunately the diversity of DOC staff allow us to provide in- house language coverage for most language needs. We presently provide language coverage for internal daily operations when identified in no less than 28 languages. Facility language rosters consists of staff presently identifiable in twenty-eight languages inclusive of those ten identified within Local Law 30. A sample representation of languages at any given quarter has historically included the following: Urdu, Portuguese, Igbo, Punjabi, Albanian, .Serbian, Bengali, Greek, Arabic, Hebrew, Edo, Patois, Bangladesh, Romanian, Tagalog, Hindu, Yoruba, and Vietnamese. The population's language needs are serviced via these quarterly rosters except in rare instances when an identified language is not within our staff's. We utilize the citywide language bank (VLB) when a language need is outside of our staff's purview. We contract written materials for the population and public's consumption.

Service delivery requires effective communication. The DOC is sensitive and responsive to LEP persons in our custody and during our engagement with the public. We will recruit multi-lingual staff for rosters via internal memorandum disseminated within 1) Human Resources new civilian hires, 2) Academy new recruit and pre-promotional officer training classes. 3) Morale Committee meetings. (The Morale Committee is comprised primarily of fraternal organizations who have historically provided native source language staff). 4) Teletypes which are agency-wide notifications.

The DOC's medical provider (Health and Hospital) contracts for their language coverage needs separately. Our Health Services Division provides for American Sign Language (ASL) secured by the Disability Rights for Inmates Coordinator. ASL knowledgeable staff and contracted services provide coverage as operationally needed. An upgrade of the orientation tape for the population proposes including ASL and multi-language captioning perhaps in FY20. We have been working with deaf and hearing-impaired persons in our custody for decades. In addition to ASL we provide the New York Times in braille. Health and Hospital doesn't maintain phone language access figures which they use for clinical purposes. ASL figures we record. We've begun discussion on how to sharing language identification- only information between our agencies.

The DOC Language Access Coordinator will ensure agency compliance of LL30 as described within this Language Access Implementation Plan (LAIP). Data retrieval can occur via several avenues which include the following: 1) Telephonic assistance as noted from invoices. 2) The Language Liaison's record of direct requests.

Activation Language Services

When the commands cannot internally provide the coverage necessary for their presenting verbal and written requests from their roster, they inform the Central Operations Desk (COD). The COD is a 24 hour operation. The Language Access Coordinator is phoned or emailed either form the command, COD or both. DOC's participation with MOIA Liaisons is always invaluable especially since the VLB identifies language certified employees.

The DOC ensures that persons in our custody have the ability to effectively communicate with staff therefore ensuring a safe, secure and respectful correctional environment. The DOC ensures that LEP (Limited English Proficient) family and friends can comprehend materials generated for public consumption which includes security requirements, various procedures and practices, restrictions and allowances. Our agency website remains multi-language accessible.

III. LEP Population Assessment: The four point resource assessment model will be implemented by our Population Research Group utilizing data gleaned from our intake processing and citywide demographics sources.

Factor I: As of December 2017, data derived from DOC's Population Research Group provided the following racial/ ethnic breakdown for the inmate population: Black 53%, Hispanic 33.7% White 7.4%, Asian 1.8% and Other 4.1%. Additional demographic data sources will be gleaned from data provided upon intake.

Multi-lingual assistance under consideration may require at a minimum two sets of phones per command, one for the public in the facility visit area (and an additional one at the borough-based facilities in the bail payment areas and one for inmates at intake. We may utilize instead or in sync with dual headset phones, language phone codes accessible from agency phones for designated staff.

Visitors to Rikers Island might enter the Perry Building and/or the Benjamin Ward Central Visit, both of which will have some form of phone access.

During Intake, when language needs are identified, we will determine how staff can report how necessary assistance was provided at the command level, COD or Headquarters. This flagging will allow us to quantify the frequency of these needs, and how they are rectified.

Effective communication when possible is crucial upon Intake in particular when we have so much to sort out, (e.g. housing and medical assessments). Our ability to secure language needs upon entry sets the tone for the duration of the incarceration. Intake may require another set of phones and/or code access on existing phones. Mutual understanding by staff and the population and expectations is crucial. Language cannot be a deterrent to comprehension. .

Factor 2: We are invoiced on phone generated language assists. The DOC will commence noting on a quarterly basis data retrieved from a contractor regarding calls generated for public consumption

Factor 3: Importance to DOC: We are responsible for the care, custody and control of persons in our custody. Effective communication allows us to address needs and concerns expeditiously. We provide documents, notices, posters, program schedules, and visit guides.

.The DOC has always been acutely sensitive and responsive to LEP persons in our custody and during our engagement with the public. Our Central Office of Procurement (COP) has been advised of our intent with respect to LL30. Task orders have been prepared for DCAS.

The DOC will continue to provide LEP persons in our custody with access to services ensuring the safety and security of the facility and care, custody and control of all persons in our custody.

Language Identification Cards will be readily available to all Tour Commanders for their immediate access. Upgraded materials (e.g. rule book inserts) are provided in both English and Spanish utilizing plain language via a contracted vendor. Agency specific materials are translated continuously for LEP persons and are carefully vetted.

Telephonic language coverage will be re-introduced and utilized to include the public and internal population needs with access codes for identified staff with direct inmate contact.

We will reintroduce the language identification memo book inserts carried by uniform staff at all times. PREA (Prison Rape Elimination Act) and all special populations will be afforded the same access to language services via language identification posters and trained staff.

Upon custody, individuals interact with both uniform and civilian staff. Initial intake processing provides us an opportunity to determine if there is a language barrier. Language Identification posters will be prominently displayed advising the public of our accessible available to them. MOIA is updating posters, so when available we will place them in these public areas. These language identification posters were previously placed in common, high trafficked areas within commands, visit houses, and Central Visit. We will resume that practice with new posters. I presently have facility rosters and will remind commands to forward theirs to COD as well. I am in the process of revamping and resurrecting the telephonic system.

Emergency Service Responders will be apprized of the availability of COD's rosters and telephonic systems in place for language assistance.

Factor 4: Costs approximated for this coverage are presently designed as blanket orders activated as needed for the multiple year (3) coverage have been approximated as follows: ASL for@ \$9,657.00, Translations for \$83, 625.00 Telephonic for \$10, 867, and In-Person for \$\$9,950. We will secure a small purchase order providing Document Review for less than \$20,000. ASL though not included within the LL30 identified languages is an inclusion we've covered for decades. We provide the New York Times in braille, identify Basic ASL proficient staff, and we may repeat ASL staff training FY19. According to LL30, agencies are encouraged to utilize certified interpreters as well. We have not traditionally contracted for such service. Human Resources is determining if there are any union issues resulting from staff volunteering their language skills. However we have include a task order providing for onsite assistance after the exhaustion of other volunteer resources.

The Emergency Response Unit employs a LRAD (Long Range Acoustic Device). We are discussing any upgrades allowing for the inclusion of additional languages.

We translated posters (e.g. Appropriate Visitor Attire) in the previously required languages namely Chinese, Haitian-Creole, Italian, Korean, Russian, Polish, and Spanish which still appear sufficient per our demographics.

Our existing Operations Order provides for the command level roster's quarterly development and dissemination to COD and the Language Access Coordinator. We are in the process of promulgating a revision within FY19 outlining the procedures staff will employ for enhancing language access. "Commonly distributed materials' is defined within DOC as those Rules and Regulations which govern the smooth operation of the commands.

IV. Provision of Language Access Services

Translation Services: After managerial approval, staff provide materials for translation and forwarding to the contractor. The contractors provides a quote that has to be approved by the Language Liaison Coordinator. Upon determination of project cost (regular or rush materials), the signed quote is sent back to the contractor as approved for work commencement. The vendor supplies the translated materials which are reviewed by in-house staff and/or VLB recruits. After review and discussion, a final version is supplied to the submitter and the translation is considered completed.

Braille New York Times, magazine and audio books are provided to our population free of charge from the New York Public Library.

Interpretation Services Facility rosters are our source for verbal language exchange. The VLB is accessed when an identified language is not in-house. Funding is provided for contracted professional language services agency -wide, however we do not presently contract for an on-site interpreter.

Notification of Free Interpretation Signage

V Training: Our Academy's inclusion of LEP awareness and tools in all pre-promotional training and entry level orientation literature is assured. Inclusion within Human Resources packages as well for new employees serves the following dual purpose:

- 1) An informational resource when determining /assessing that an LEP person requires assistance
- 2) Recruitment after their probationary period for self- disclosure of language proficiency.

We will continue to scour college programs for free college interns and trainings for DOC staffers interested in becoming language document reviewers. We are also considering upgrading our ASL staffs' skills with refresher trainings.

Staff will be apprised of our requirement to note all instances of language assistance for compliance with Local Law 30's reporting needs. Logging interpretations on a daily basis is not feasible since they occur seamlessly. We have to consider how this data is noted for reporting purposes.

"Plain language" is already employed by staff who develop materials for public consumption. These materials are reviewed and are required to state they are approved by management by the submitter prior to submission for translating in some instances by our legal division. To the extent that plain language doesn't interfere with the comprehension of the material presented, footnotes of terminology might have to be added which requires administrative approval and consideration.

- Included within the mandatory training packages of staff will ensure that all are aware of our outreach and .tools available to assist LEP persons.
- Annual reminders to all staff with email access will underscore the recruitment and advise everyone of the language accessing process we employ will commence FY19.
- Academy training sign-in sheets will be tallied on a quarterly basis when the topics covered include languages access materials. Teletype distribution cited for the numbers of staffers advised of our language access procedures and processing.
- Human Resources trainings will be tallied quarterly when engaging materials for new hires and any follow-up that HR deems staff may have, especially those who have been processed prior to our initial inclusion of these materials (prior to FY 19).

VI. Record Keeping and Evaluation:

Data sources have been internally identified for the reporting requirements of LL30.

Population Research Group will continue to provide necessary data for reporting features.

The metrics and indicators proposed to management include: Pre and post tests immediately following instruction, then an annual quick interactive quiz , How much do you use or refer to: posters, language access telephone, peers, for language assistance? Annual spot checks with staff informally or formally to assess language access will be incorporated.

VI. Resource Analysis and Planning:

- 1) Facility generated rosters will continue to provide on-site initial coverage.
- 2) We will investigate contracting on-site interpreters via college interns for coverage when all other options have been exhausted.
- 3) The city's Language Bank Liaisons continue to provide resources and volunteers from their respective agency coffers.
- 4) Informal connections with DOC staff provide on the spot translation reviews and suggestions
- 5) regarding translations as needed.
- 6) The DOC will continue contracting services (telephonic coverage of one hundred languages) to provide for compliance of LL30.

The Language Access Coordinator will compile reports from all areas providing service for an analysis of any areas lack of language access. Our front -line staff and their supervisors are the key to informing all of us if they suspect a language barrier is a presenting problem. We address circumstances immediately in order to quell any potential security, care and control problems. Staff will be reminded to use query listed on Intake Form 239M (Section D) flagging possible LEP status.

VII. Outreach and Public Awareness: Language variable phones will be secured via a contracted vendor for distribution projected usage within Visit Houses, the Perry Center, and the Benjamin Ward Central Visit site.

Our website presently provides multi-lingual information which also complies with LL30 requirements. Identification of language needs via identification cards will continue. We continue to ensure that LEP persons have access to all necessary agency information allowing for the safe, secure and respectful engagement of their exchange with the DOC.

Posters will be prominently displayed in public accessible areas as mentioned above. Visit house assigned staff will have access to telephonic services.

IX. Language Access Complaints: Constituent Services will be encouraged to identify feedback from 311 calls. We continue to ensure that LEP persons have access to all necessary agency information allowing for the safe, secure and respectful engagement of their exchange with the DOC. Agency staff tracking these instances will have to be identified to the Coordinator of Language Access for future reporting purposes.

X. Implementation Plan Logistics: The DOC will continue providing language assistance for LEP persons in our custody and the public. Staffs awareness is strengthened via our use of posters displayed in common areas, stand-alone language identification cards in offices, and the reissuance of the memo insert cards all uniform staff carry on their person. The expansion of telephonic access to additional front-line staff will be initiated.

Compliance of LL30 will be monitored by the Language Access Coordinator who will oversee the following milestones:

Milestones: FY19

Goal 1: Inclusion LEP goals for New Recruits and In-Service Orientation/Training

Materials: Orientation Package Updating

Milestone: DOC employees are reminded of this policy during continuous ongoing training cycles

Staff: Academy and Human Resources

Deadline: June 2019

Goal 2: LEP Orientation/Training for Civilian Managers

Materials: Rosters

Milestone: Quarterly

Staff: Academy and On-Site Coordinator

Deadline: June 2019

Goal 3: Civilian Facility Staff Awareness of LL30

Materials: Memorandum via email accounts

Milestone: Command-based civilians are apprised of the LL30 and their volunteer recruitment

Staff: Administration

Deadline: June 2019

Goal 4: Medical provider provides data or are at least apprised of a LEP detainee (this requires shared procedural approvals from both agencies)

Milestone: Quarterly data retrieval

Staff: D/C Health Affairs and Health staff and Hospital Administration

Deadline: June 2019

Goal 5: Expansion of telephonic services
Materials: Code designations provided to DW Programs
Milestone: All commands
Staff: Intake, Security Intelligence, Counseling, Law Library
Deadline: June 2019

Goal 6: Language ID Posters Re-Issuance
Milestone: All commands
Staff: Facility staff will ensure placement of posters per LL 30
Deadline: MOIA is presently updating (August 2018?)

Goal 7: Language Identification Memo Book Inserts Re-Issued
Milestone: All uniform staff
Staff: All staff
Deadline: MOIA is updating (August 2018?)

Milestones FY20

Continuation of all prior FY Milestones

Goal 1: Video Relay Services (VRS) for deaf/ hearing impaired persons in our custody.
Milestone: Secured as needed
Staff: Health Affairs
Deadline: June 2020

Goal 2: Closed- captioning to include ASL in a corner of the orientation constant loop tape and voiceovers in Spanish
Milestone: All facilities utilizing the Orientation Tapes
Staff: Facility staff
Deadline: June 2020



AGENCY LANGUAGE ACCESS PLAN

NEW YORK CITY DEPARTMENT OF DESIGN AND CONSTRUCTION

2018

Language Access Coordinator: Dalela Harrison, Agency Equal Employment Opportunity Office

I. Introduction and Agency Mission

From the pedestrian plaza in Times Square to the Far Rockaway Library, the Department of Design and Construction builds for New York City. As the City's primary capital construction project manager, we build many of the civic facilities New Yorkers use every day. We provide communities with new or renovated structures such as firehouses, libraries, police precincts, courthouses, senior centers and more. To successfully manage our portfolio, we collaborate with other City agencies, as well as with emerging and world-renowned architects and consultants to achieve our agency mission.

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 construction liaison 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.

II. DDC's Language Access Policy and Goals

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.

DDC has designated its EEO Officer, as the agency's Language Access Coordinator (LAC). The EEO Officer, and her staff serve as the primary point of contact, for language access needs, compliance efforts, plan implementation, language services, including interpretation and translation, and ongoing procedural, and programmatic assessments. The plan will be reviewed on an annual basis and the LAC will institute ongoing measures to monitor its success. The LAC and her team will leverage the guidelines and requirements of Executive Order 120 (EO 120) of 2008, and Local Law 30 (LL 30) of 2017, and collaborate with the Mayor's Office of Immigration Affairs (MOIA), in executing the goals of this plan.

Agency Language Access Goals

Guided by LL30 and MOIA, DDC's language access goals are as follows:

- Provide meaningful access to information and services, for all New Yorkers.
- Develop and implement procedures, in compliance with EO 120, and Local law 30 to improve information flow to the public.
- Increase plain language communication regarding agency programming, timelines, construction impact and project completion.

- Enhance community outreach and effective information sharing while remaining responsive to feedback regarding our efforts.
- Train public facing staff, in assisting LEP constituents with language services.
- Encourage multilingual staff to participate in DDC’s Voluntary Language Bank.
- Leverage staff and Community Construction Liaisons (CCL’s) in providing timely interpretation and translation services, where appropriate.
- Develop an on-going agency campaign to inform members of the public that language assistance services are available for people with Limited English Proficiency (LEP).

III. LEP Population Assessment

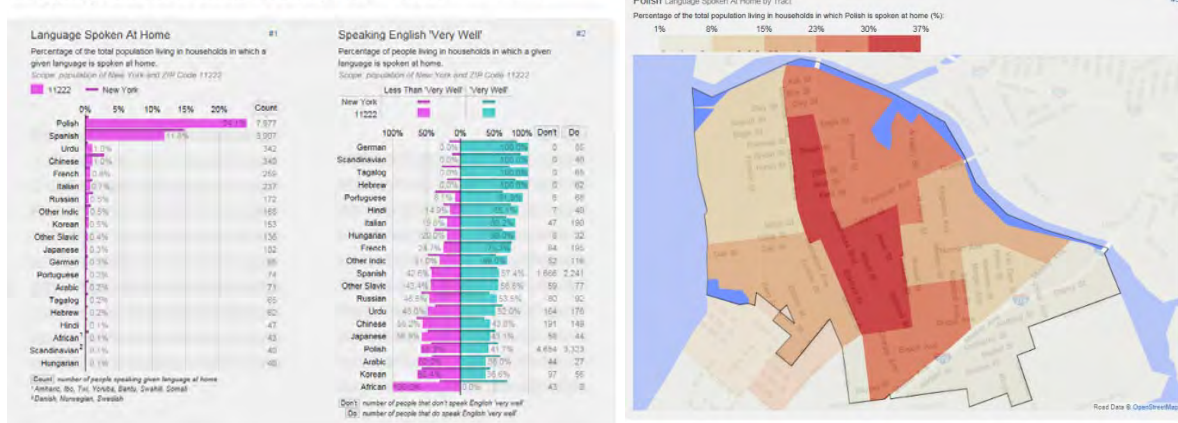
Four-Factor Analysis

DDC is 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 in providing information and services to diverse population through community outreach, inclusive publication, and language access.

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. 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 will continue to utilize data gathered directly from City Council members, by our Office of Community Outreach and Notification, during the development of construction project profiles. We will also leverage the information gathered using our Business and Residential Community Surveys. These surveys were translated into 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. 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.

Department of Design and Construction
Office of Community Outreach and Notification
Brooklyn

Community Outreach
• Address changes within 100 feet of project work area necessary in advance of the anticipated work area.

Construction Impacts
• The DDC is committed to maintaining a project work area that is safe and well kept. However, dust, noise, and other impacts are inherent to construction work and will be present during the project.

Special Needs
• To minimize inconvenience, the DDC will work specifically with impacted individuals who will be impacted by the project. Please reach out to the project manager.

Project Contact
Name: [Redacted]
Phone: [Redacted]
Email: [Redacted]

During the working hours
Please call for any project information or to request a copy of this project profile.

General Contractor
Tully Construction, Corp. Inc.

Project Information
Work operations will occur along Leonard Street between 62nd Avenue and 64th Street.

Map
Map showing the project location in Brooklyn.

Department of Design and Construction
Third Quarter - 2017

Reconstruction of Grand Concourse Service Roads

E. 172nd St. to E. 160th St. and Side Streets

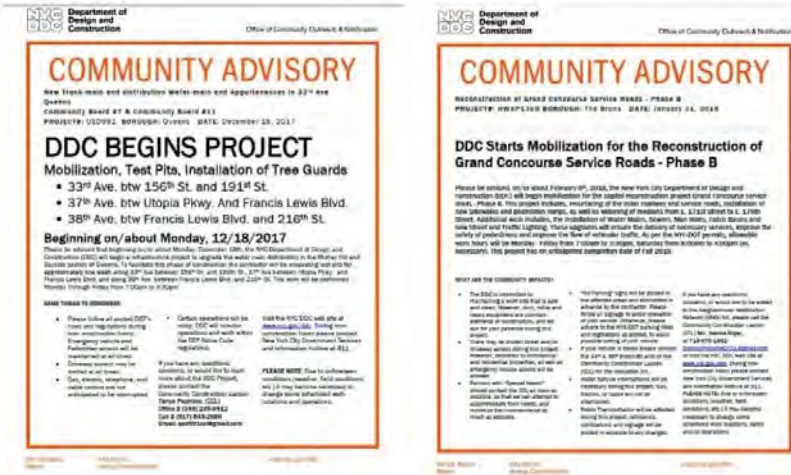
Project # RWXP136A

Construction Impacts
• Construction will occur from 10:00 AM to 6:00 PM, 7 days a week, from 10/1/17 to 10/31/17.

Project Contact
Name: [Redacted]
Phone: [Redacted]
Email: [Redacted]

Map
Map showing the project location in the Bronx.

Photo
A photograph showing construction equipment and workers on a road.



WHO WE ARE

The Department of Design and Construction (DDC) is a leading provider of design and construction services for the City of New York. We are committed to providing high-quality, cost-effective services to the City and its residents.

CONTACT

Deputy Commission
Loren "Lee" Tomasetti

Program Coordinator
Suzanne Spivack
Antonio Murillo
Omar Rodriguez
Suzanne Spivack
Loren "Lee" Tomasetti

Community
Partnerships
+
STEAM
Initiatives

The Department of Design and Construction (DDC) is a leading provider of design and construction services for the City of New York. We are committed to providing high-quality, cost-effective services to the City and its residents.

Department of Design and Construction
 100 West Street, 10th Floor
 New York, NY 10038

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.

<p>Arabic العربية</p> <p>Chinese 中文</p> <p>Spanish Español</p> <p>French Français</p> <p>German Deutsch</p> <p>Hebrew עברית</p> <p>Hindi हिन्दी</p> <p>Italian Italiano</p> <p>Japanese 日本語</p> <p>Korean 한국어</p> <p>Portuguese Português</p> <p>Russian Русский</p> <p>Tagalog Tagalog</p> <p>Tamil தமிழ்</p> <p>Vietnamese Tiếng Việt</p>	<p>Arabic العربية</p> <p>Chinese 中文</p> <p>Spanish Español</p> <p>French Français</p> <p>German Deutsch</p> <p>Hebrew עברית</p> <p>Hindi हिन्दी</p> <p>Italian Italiano</p> <p>Japanese 日本語</p> <p>Korean 한국어</p> <p>Portuguese Português</p> <p>Russian Русский</p> <p>Tagalog Tagalog</p> <p>Tamil தமிழ்</p> <p>Vietnamese Tiếng Việt</p>	<p>Arabic العربية</p> <p>Chinese 中文</p> <p>Spanish Español</p> <p>French Français</p> <p>German Deutsch</p> <p>Hebrew עברית</p> <p>Hindi हिन्दी</p> <p>Italian Italiano</p> <p>Japanese 日本語</p> <p>Korean 한국어</p> <p>Portuguese Português</p> <p>Russian Русский</p> <p>Tagalog Tagalog</p> <p>Tamil தமிழ்</p> <p>Vietnamese Tiếng Việt</p>	<p>Arabic العربية</p> <p>Chinese 中文</p> <p>Spanish Español</p> <p>French Français</p> <p>German Deutsch</p> <p>Hebrew עברית</p> <p>Hindi हिन्दी</p> <p>Italian Italiano</p> <p>Japanese 日本語</p> <p>Korean 한국어</p> <p>Portuguese Português</p> <p>Russian Русский</p> <p>Tagalog Tagalog</p> <p>Tamil தமிழ்</p> <p>Vietnamese Tiếng Việt</p>	<p>Arabic العربية</p> <p>Chinese 中文</p> <p>Spanish Español</p> <p>French Français</p> <p>German Deutsch</p> <p>Hebrew עברית</p> <p>Hindi हिन्दी</p> <p>Italian Italiano</p> <p>Japanese 日本語</p> <p>Korean 한국어</p> <p>Portuguese Português</p> <p>Russian Русский</p> <p>Tagalog Tagalog</p> <p>Tamil தமிழ்</p> <p>Vietnamese Tiếng Việt</p>
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IV. Provisions of Language Access Services

DDC utilizes business and residential surveys, also known as project profiles, for canvassing neighborhoods and assessing needs during the pre-construction phase and beyond. Our business and residential surveys have been translated into 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. Bi-lingual Community Construction Liaisons/contractors are then assigned to construction sites consistent with community language needs. Project Managers also receive guidance and specific requests from the community boards regarding language needs. In addition, DDC's Language Access Coordinator regularly evaluates language needs using census data, as well as, StatisticalAtlas.com. These assessments ensure the agency is providing necessary language services in the communities we are serving.

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 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.

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. In addition, we are working with ITS to ensure that the public can submit complaints and requests for translations or inquiries through our website email link– accessibility@ddc.nyc.gov. DDC’s Language Access Plan will be made publicly available on its website and 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.

V. Training

Training will be provided for all current staff in direct service areas within 90 days of approval of the Language Access Plan. 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 Plan and written training materials will be provided to staff and will be available on DDC’s Intranet.

VI. 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 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 Voluntary Language Bank participants to quality check translated materials, with specific focus on documents that include esoteric words and industry specific terminology.

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.

VII. Resource Analysis and Planning

DDC will continue to 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.

VIII. 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.

IX. Language Access Complaints

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

- The Language Access Coordinator and team will address all inquiries, requests, and complaints on behalf of DDC.
- The Language Access Coordinator will facilitate resolutions and track response time for reporting purposes.
- Complaints and requests related to language services may be submitted by contacting a CCL, by calling 311, by visiting DDC’s website, by emailing us at accessibility@ddc.nyc.gov, or by calling us at 718-391-2815.
- Complaint data will be tracked quarterly and DDC will include information about complaints as part of our annual reporting.

How members of public can submit language access complaints, questions, and requests	Agency 311 Data (CY 2017)	Description of how complaints/requests were addressed
Currently, through 311. However, the public will also be able to submit language access requests through our agency website, via-email.	# of language access complaints received via 311: 0	N/A
	# of requests for language access services via 311: 0	N/A

X. Implementation Plan Logistics

Language Access Coordinator

In 2017, DDC designated the Agency Equal Employment Opportunity Officer, as its Language Access Coordinator. The Language Access Coordinator serves as the primary point of contact for implementing Executive Order 120, Local Law 30 and similar Federal and City mandates.

Language Access Goal and Milestones

Language Access Goal	Milestones	Responsible Staff	Deadline
Launched Voluntary Language Bank. DDC's goal is to have 2 employee participants for each of the 10 languages required under LL 30.	Our bank currently consist of 8 employees, who are proficient in 9 languages.	Language Access Coordinator	On-going effort
Translated project profile surveys for businesses and residents in the top ten citywide languages required by EO 120, and expanded by LL 30.	Translation complete.	Language Access Coordinator	August 21, 2017
DDC submitted LAIP draft to MOIA.	Completed and received guidelines from MOIA.	Language Access Coordinator	Completed
DDC will submit final LAIP.	Draft was submitted, we are revising the LAIP as required by MOIA	Language Access Coordinator	May 1, 2018
Created and distribute Language Identification Guides	Language Identification Guides were revised and approved on March 14, 2018; DDC is awaiting final printing.	Language Access Coordinator	May 2018
Language plan will available in the 10	DDC contracted with Language Line and will be	Language Access Coordinator	July 1, 2018

languages required by LL 30.	able to translate the LAIP, once it is finalized and approved.		
Language Access complaints may be submitted on DDC's website.	DDC has established an email account, accessibility@ddc.nyc.gov where complaints can be submitted.	Language Access Coordinator	July 1, 2018
LAIP will be reviewed twice a year.	DDC is finalizing LAIP.	Language Access Coordinator	April 2019
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	April 2021

City of New York
Department of Environmental Protection
Commissioner Vincent Sapienza, P.E.

Local Law 30

Language Access Implementation Plan

May 2018



**New York City Department of Environmental Protection
Local Law 30
Language Access Implementation Plan
May 2018**

**Language Access Coordinators:
Sara Pecker, Director-Special Projects and Initiatives
Eileen Alter, Deputy Director, Special Projects and Initiatives**

SECTION I 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

BCS offers a “Free Water-Saving Test Kit” that contains an informational booklet with instructions in Spanish and English for installing the kit’s several water-saving devices. There is also copy in Russian, Chinese, Korean, and Haitian-Creole inviting customers to write to the company for instructions in their respective language, and which will be updated to include the remaining languages of Arabic, Urdu, Bengali, Polish, and French.

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.

The 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 (LTCPs), 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. Each of these documents is reviewed and edited to conform to plain language guidelines and standards.

SECTION II 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 ten designated citywide languages; and to provide translations of its most widely distributed documents so that the Limited English Population (LEP) population 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 at least 100 languages. The agency is and will continue to translate essential information and its most widely distributed documents into the ten citywide designated languages, and will be creating a landing page on the DEP website for each of the ten languages. Widely distributed documents will carry a sentence that directs speakers of the top ten 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.

SECTION III LEP POPULATION ASSESSMENT

How will you execute the Federal Department of Justice “Four-factor Analysis”?

BCS Borough Customer Service Offices (Five Borough Offices):

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

BCS Borough Offices determined that it provides direct service to approximately 77,000 walk-in customers each year. Surveys show that approximately 1,500 customers are served each week at the BCS Borough Office locations. About 2% of these customers request language translations.

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

The Borough Offices encounter LEP customers on a weekly basis. We monitor the monthly billing reports from our Voiance Interpretation vendor on the number of calls made in our various Borough Offices.

The list below shows the most frequented languages requested in our Borough Offices:

- Manhattan Borough Office-Spanish, Chinese, Russian, Hindi
- Brooklyn Borough Office- Spanish, Hebrew/Yiddish, Haitian-Creole, Russian, Chinese
- Bronx Borough Office-Spanish, Chinese, Korean, Italian, Russian
- Queens Borough Office-Spanish, Chinese
- Staten Island office, Spanish, Russian, Chinese

Factor 3: The importance of the benefit, service, information, or encounter to the LEP person

The Borough Offices are a vital customer service operation. It provides information to LEP customers by assisting them in understanding billing issues, water conservation programs, payment, payment inquiries, payment plans, lien sales, permits and any other related water and wastewater issues.

If BCS were 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 language services

The Borough Offices 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 Translation Contract. Voiance is easily accessible when the requested language is not available at the time of the call.

BCS Call Center:

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

According to the 2017 Fiscal Year report, the Call Center responded to approximately 400,000 customers citywide. Reports and surveys collected by the Call Center Customer

Service Representatives indicated that approximately 3% to 5% of all calls taken were in Spanish and/or Chinese.

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

The Call Center encounters LEP customers on a daily basis. The Call Center tracks the number of LEP calls by requiring bilingual Chinese representatives to provide daily call logs. Through the monthly billing reports from our Voiance Interpretation vendor, we are able to track the number of LEP calls made in our Call Center.

Factor 3: The importance of the benefit, service, information, or encounter to the LEP person

The Call Center is a vital customer service operation. It provides 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 were 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 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 Translation Contract. Voiance is easily accessible when the requested language is not available at the time of the call.

To ensure that bi-lingual (Spanish) employees are qualified to provide accurate interpretation, the bureau has employees tested for proficiency in that language.

The Spanish Proficiency Test is administered by Language Line Academy. Language proficiency requires knowledge of grammar, vocabulary and syntax, among other things. The test is an oral proficiency interview conducted entirely in the tested language and designed to identify an individual's level of linguistic proficiency. This test uses Interagency Language Roundtable (ILR) rating scale, which is widely accepted by the government agencies and education sector in the United States. All Language Line tests have been validated by external experts or a psychometrician. The cost of the exam is \$145.00

The rating scale ranges from 1 to 5;

1. Novice
2. Low Intermediate
3. High Intermediate
4. Advanced
5. Educated Professional

Language Line Academy allows you to choose the date and time you want to schedule the candidate to take the test. After the candidate has taken the LLU Language Proficiency Test, the test results for the candidate are sent to the requested agency/organization coordinator within 3-5 business days.

BCS has two bi-lingual (Chinese) employees with more than ten years of service each, and the bureau has not found a need to have them tested nor to hire additional Chinese speaking employees.

IV PROVISION OF LANGUAGE SERVICES

Translation Services

The agency is in the process of reviewing the documents generated by each of its bureaus, and has identified the most widely distributed documents to be translated into the ten designated citywide languages. The documents to be translated include reports such as the annual Drinking Water Quality Report, as well as information on lead in drinking water, business letters sent to customers regarding their water and sewer charges, and delinquency notices, as well as notifications regarding discolored water, water shutoffs, and notices involving breaks in customers' water and sewer lines. It also includes information on rain gardens and a Right-to-Know brochure.

All documents will have a plain language review prior to translation and any reprinting, and moving forward all new documents will be reviewed prior to printing to make sure they are written in plain language. Staff from each bureau is attending plain language trainings, with two additional trainings scheduled for June, and the agency is developing a share point site for the review of new documents to ensure they comply with plain language principles.

DEP is contracting with professional translation services to provide translations, and is utilizing agency and city volunteer language banks to provide secondary reviews to ensure that the translations are accurate and make sense. When necessary, the Language Access coordinator will speak with the translators to make sure that the meanings of any translations are not just literal, and that they accurately reflect the intent of the messaging.

The goal of DEP's language access plan is to translate all widely distributed documents during FY 18, so that in FY 19 we can design the documents and place them on a language specific landing page.

The Agency currently uses a Volunteer Language Bank (VLB) in addition to contracted services for translation services on a limited basis. DEP has taken steps to enhance the language bank by initiating an agency-wide request for language translation and interpretation volunteers via an email to bureau administrators to canvas their staff on a regular basis for bi-and multi-lingual volunteers. Agency volunteers have been identified and the language bank database is being updated to reflect the names of additional

volunteers and the type of service (written, verbal translations) they will perform. The VLB coordinator will maintain and update the database on a regular basis, i.e., tracking volunteers by name, bureau and telephone, and language proficiency. Language service requests, dates received, and type of service (written, verbal translations) will be tracked in the database, which will be updated according to a regular schedule.

DEP's website, including digital media, press releases, and other than PDF documents, are all translatable using Google. The goal is to replace as many PDFs as practicable using professional translation services.

The DEP Press Office has also incorporated the City Hall Ethnic Media List into its distribution list.

Interpretation Services

The agency has made a determination that all of its inspectors, emergency responders, and staff that interact with the public should have the ability to utilize interpretation services. To that end, DEP has provided mobile phones and access to interpretive services to nearly everyone in the agency that interacts with the public, which will enable them to have a three-way conversation in at least 100 languages, including DEP Police and Security who respond to emergencies. Mobile phones will be provided for the few inspectors who do not yet have them.

In order to maximize bureau resources effectively, language access services provided by the Bureau of Customer Services will utilize a hierarchy for service provision. Borough Office and Call Center bi-lingual staff will provide service to LEP customers 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 their interpretation contract. This will allow the Bureau to maximize the dollars allocated through this contract.

DEP will continue to provide interpretation services through, bi-lingual employees in those areas where there is a preponderance of individuals who speak a particular language.

The Bureau of Environmental Compliance (BEC) has two public service windows, located on the 8th and 9th floors at 59-17 Junction Boulevard, Queens, NY where the public may come to pick up or drop off applications. One is the Asbestos Window and the other is the Records Control Window.

The purpose of the Asbestos Window is to allow members of the asbestos industry and the public to tender applications, notifications, and written requests relating to asbestos abatement projects. Applications are presented for certification as asbestos handler, asbestos supervisor, and asbestos investigator. Notifications are provided as directed by regulation for proposed asbestos abatement. Written requests are delivered for consideration of variances to the regulations as they apply to specific asbestos abatement projects.

The Asbestos Unit has bilingual personnel available to handle the majority of the clients they serve. Should the need arise to have interpretations conducted in any of these languages, the bureau has telephonic capability through an interpretation service.

At the Records Control Window, customers may come to the window to ask questions about air permits, to drop off permit applications and checks, or to speak to someone about a Notice of Violation (NOV). The LEP customer base is Spanish and Chinese and there is bilingual staff at the window to provide interpretation. In the few instances where interpretation to another language has been helpful as the customers were not comfortable with English, the bureau has telephonic capability through its interpretation service.

The Bureau LAC will continue to monitor the customer base to determine if there are needs that are not being met.

Outreach events and public hearings coordinated by BPAC will be vetted in consultation with DEP's Community Affairs Unit who will assess each instance as to whether it is necessary to provide interpretation services.

Notification of free interpretation signage –

BCS utilizes language cards developed by the Mayor's Offices of Operations (MOO) and Immigrant Affairs (MOIA) that customers can use to point to the language they speak.

The BCS Borough Offices use the City's "I Speak" cards and Guidelines for Interpreting Services template for identifying the language the LEP customer speaks to let the greeter know that an interpreter is needed. .

The two BEC public windows use Language Identification Cards.

Nearly all other bureau inspectors in the field carry Language Identification Cards, and any inspectors that do not currently carry them will be receiving the cards in the current fiscal year.

Language Access planning for Emergency Preparedness

DEP will ask each bureau to make sure that they account for the continuity of language access needs in their respective COOP plans

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 notification.

Any other emergencies that would constitute activating the coop plan would be handled through NYCEM.

V Training

The Agency conducts a new hire orientation every two weeks, and will add a component to address the importance of language access and writing in plain language to the program for all new hires.

The Bureau of Customer Services has a staff of professional trainers that are responsible for the training needs of all of its employees. The professional trainers train all BCS staff members who utilize the interpretation services. The training program is integrated as part of new staff orientation and is available as a refresher class when needed.

It is DEP's goal to ensure that all its inspectors and other public facing employees are trained on a yearly basis. We will meet with the appropriate bureau liaisons to develop a plan that is practicable to each bureau.

VI Record Keeping and Evaluation

A bureau liaison at each BCS Borough Office sends the Manager of the Borough Offices 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 (5) 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 LEP staffing requirements. Information is captured daily, submitted weekly for in-house compiling and internal reporting, and reported monthly in the Bureau's Metrics Data.

The Call Center and the Borough Offices' information will be sent to the Language Access Coordinator (LAC) on a quarterly basis for evaluation. Modification to the Language Access Plan will be considered if supported by the empirical data.

Other bureaus do not meet with the public with the same frequency and volume that BCS does, and have not kept these kinds of records. Nevertheless, all bureaus have access to interpretive and translation services. Each bureau that utilizes translation and/or interpretation services will be tasked with developing a system to allow for regular evaluations in order to adjust their programs to the needs of the LEP population. The Agency Language Access Coordinators will work with the bureau liaisons to monitor the plan on a quarterly basis.

VII Resource Analysis and Planning

The Borough Offices and the Call Center have developed a cost-effective strategic plan to address the LEP customer language needs as described in Section IV.

The LAC met with all the other bureaus individually to review the law and to determine what services they would need to ensure that they were in compliance. To that end, mobile phones were provided to DEP Police, inspectors, and other staff that interact with the public outside of DEP's offices, and interpretation services were contracted for the agency.

This fiscal year, BPAC is taking the lead to have all the widely distributed public facing documents translated. While we have ensured that there is an agency wide translation contract this fiscal year, we will work with the individual bureaus to make sure that they continue to fund the primary translation contract in the coming fiscal years. This will enable them to take over the responsibility for translating their individual documents, once they have been vetted and approved for plain language.

BPAC is working with the DEP Office of Information Technology to develop a SharePoint site to enable bureaus to submit their public facing documents for a plain language review.

BPAC has worked with Organizational Development and Human Resources to bring Plain language training to its Lefrak headquarters for all the staff that write any public facing documents. Several classes have already been conducted and there are two additional Plain Language trainings scheduled for June 2018.

DEP is developing an LEP Language landing page on its website to make it user friendly where a speaker of the ten citywide designated languages can find any widely distributed documents translated in their language.

VIII Outreach and Public Awareness

DEP has informed its Bureaus and offices of Local Law 30, ordering each City agency to create and distribute 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 will also be 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 on the DEP website 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.

IX Language Access Complaints

DEP has a procedure in place with 311 whereby any language access complaints are sent to DEP's correspondence unit who will forward all Language Access issues to Sara Pecker (Language Access Coordinator) for investigation and resolution. In 2017 there were no DEP languages access complaints received by 311 as well as no requests for DEP language access services via 311.

Any complaints received regarding language access will be included in the yearly plan updates. If there are complaints, we will discuss it with the appropriate bureau. Any complaints will be analyzed and if warranted, the plan will be adjusted accordingly.

X Implementation Plan Logistics

In order to maximize resources effectively, language access services provided by the Bureau of Customer Services will utilize a hierarchy for service provision. Borough Office and Call Center bi-lingual staff will provide service to LEP customers 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 service 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 maximum assistance in more than 100 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.

Language Access Goal	Milestones	Responsible Staff	Deadline
Set quarterly LAIP review meetings with bureau liaisons	Every three months beginning 10/1/18	Agency LACs Bureau liaisons	ongoing
Begin identification and translation of widely distributed documents	initial documents out for translation by May 15	Agency LACs Bureau liaisons	Process remains ongoing

translated documents out for secondary review	documents sent for secondary review within two weeks of receipt from vendor	DEP Volunteer Language Bank	ongoing
Start design work for all translated documents	All design work within three months	Agency Language Access Coordinator and DEP Graphics	12/31/18
Develop descriptive blurbs for each translated document	All descriptions finalized within three months	Agency and Bureau Language Access Coordinators	12/31/18
Translate document descriptions	All description translated within three months	Agency Language Access Coordinator	6/30/19
Develop landing pages for top ten LEP translated documents on DEP website	Develop landing page Develop English version for every language being translated Get approvals on content before translation Post translated pages	Agency LAC and DEP Web group	Ongoing with initial documents posted by 6/30/2019 new documents translated and added to the page as they are developed
Work with the Division of Emergency Response and Technical Assessment (DERTA) on development of their Right-to-Know (RTK) Video with closed captioning	Development within 6 months and closed captioning within the following six months	Agency LAC, bureau liaison and Web group	6/30/20
Develop Plain Language Review portal for public facing documents	Portal introduction	Agency Language Access Coordinators	12/31/18
Plain Language Review Portal finalized	Launch portal	Agency Language Access Coordinators DEP SharePoint	12/31/2018

Identify documents related to issuing permits, licenses and registrations	Begin gathering documents and reviewing for plain language by July 1, 2019	Agency LACs, bureau language access liaisons	12/31/19
Translate all supporting documents related to issuing permits, licenses and registrations	Start sending out supporting documents for translation	Agency LACs, bureau language access liaisons	6/30/20
Post all translated supporting documents on the website	Ongoing posting as documents are translated	Agency LACs and DEP web group	6/30/20



LANGUAGE
ACCESS
IMPLEMENTATION
PLAN

May 1

2018

Commissioner Jacques Jiha, Ph.D.

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I. Message from Commissioner Jacques Jiha

New York City is home to over eight million people who represent cultures and countries from around the globe. Our diversity is our strength, and we honor these cultures by offering city services in a variety of languages. This report reflects the Department of Finance's latest efforts to serve all New Yorkers, including those with limited English proficiency.

We provide interpretation and translation services in all of our units that interact or correspond with the general public. The DOF offices with direct customer service responsibilities have received language access training, and we offer many of our core services in a wide range of languages—for example, we will accept parking ticket and camera violation defenses in any language, and we offer multilingual in-person assistance at public outreach events in all five boroughs throughout the year.

The Department of Finance has been working for some time to implement Local Law 30. We have translated our most important and most frequently requested documents into the additional designated languages since the beginning of fiscal year 2018, a year ahead of the law's enactment. We are currently providing telephonic interpretation in 299 languages through our contracted service provider, Voiance. The department's website is accessible in many languages, and we continue to collect data from web analytics, 311 requests, and other customer interactions to determine how best to use our translation resources.

The Department of Finance believes that it is critically important to communicate clearly with the public and meet the diverse language needs of this great city. As the demand for language access shifts and demographics change, we remain committed to providing the best possible service to all New Yorkers, regardless of their primary language.

Sincerely,

Jacques Jiha, Ph.D.
Commissioner, New York City Department of Finance

II. Agency mission and background

The New York City Department of Finance (DOF) 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 this work, our employees interface with the public in a variety of ways on a wide range of topics. DOF collects approximately \$36 billion in revenue for the City and values more than one million properties worth a total market value of more than \$1 trillion. The department 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 \$14 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 \$160 billion pension system and \$16 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.

DOF employees **bill 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 DOF's five business centers, one of which is located 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. DOF employees collect unpaid taxes and other debt owed to the City through correspondence, phone calls, court actions, and other enforcement mechanisms.

DOF **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 tickets are one of DOF’s chief sources of customer interactions. Vehicle owners can pay or dispute their parking or camera violations online, by mail, via our Pay or Dispute app, or in person at any of our five business centers, 7-Eleven, and CVS. Our administrative law judges hear appeals of parking and camera violations, and the Adjudication Division employs a special unit for commercial vehicles.

DOF **values all property in the city**—more than one 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, DOF employees calculate, bill, and collect property taxes and other property-related charges. When property owners do not pay their taxes or other charges, DOF administers a property tax lien sale to transfer their debts to a private lienholder. DOF 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 employees 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 Department of Finance 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 Department of Finance. The Taxpayer Advocate reports directly to the commissioner and is able to assist taxpayers with issues they have been unable to resolve through normal DOF channels. The Office of the Taxpayer Advocate can recommend policy changes and request that the Department of Finance take action on behalf of taxpayers.

III. Agency language access policy and goals

The goal of the Department of Finance’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 DOF’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 DOF services free of charge. From online forms to in-person interactions with staff, the agency will not only offer free interpretation and translation, 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

DOF 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 Department of Finance 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. LEP population assessment

Before developing our implementation plan, the agency conducted an assessment to determine who needs our services, and in which languages. The Department of Finance'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 come into contact with 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

Because we serve all New York City taxpayers, we use survey data that reflect the city’s ever-growing and ever-changing population. The following sources provide the foundation of our LEP population assessment:

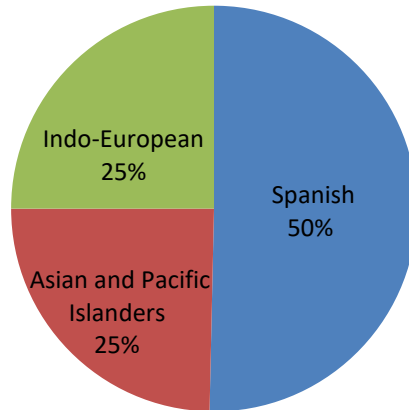
- The U.S. Census Bureau’s 2000 and 2007 American Community Surveys
- NYC Department of City Planning data and analysis

To ensure that the LAIP keeps pace with the needs of our customers, the Department of Finance will continue to review the American Community Survey for the City of New York as future editions are released.

According to the 2016 American Community Survey, New York City has a population of 8,461,961. The data below describe the language access needs of city residents:

- 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.
- Approximately 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 437,901. Several of these are among the fastest growing languages within the LEP community.

Breakdown of New Yorkers who speak English "less than very well"



According to the NYC Department of Planning, the city's immigrant population stood at 3.21 million in 2015, up 12% from 2.87 million in 2000. For scale, the city's foreign-born population is larger than the entire population of Chicago. Immigrants account for 38% of the city's population and 46% of its resident labor force.

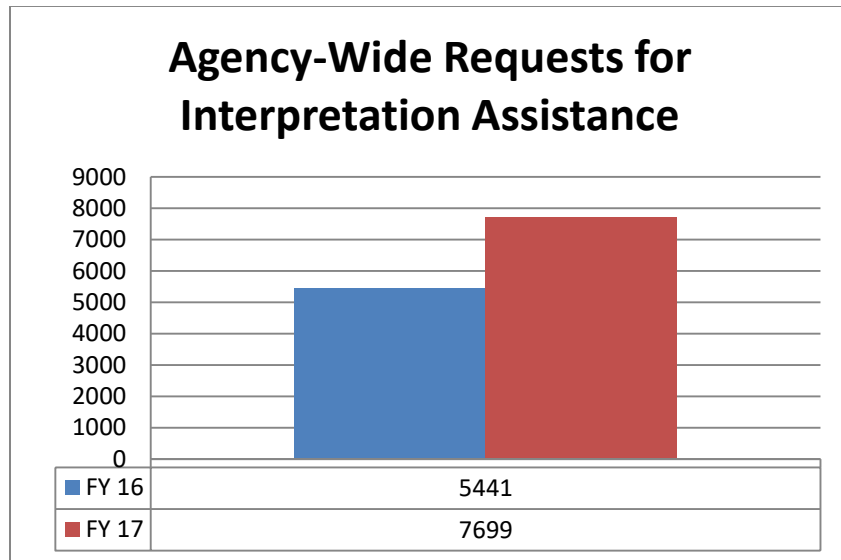
In addition to these broad studies, DOF analyzes language requests from our customers to determine their needs. The agency utilizes data collected from interpretation and translation requests made over the phone (including 311), online, from our community partners and other City agencies, and via DOF's customer case record management system. In FY17, we received a total of 7,699 requests for interpretation assistance, an increase of 41.5% over FY16 (5,441 requests).

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.

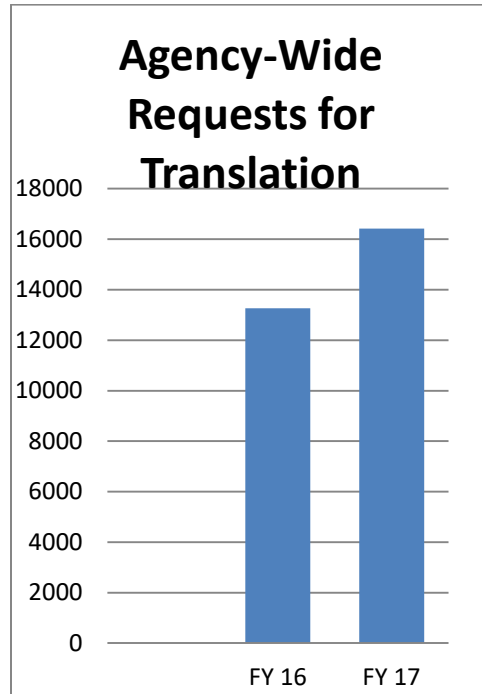
Our most recent review indicated that the vast majority of requests (97%) were comprised of the ten citywide languages mandated by Local Law 30.

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%

We have seen increased demand for Hindi, Punjabi, Turkish, Albanian, Greek, Italian, and Hebrew translation and interpretation. Although these languages comprise less than 1% of all requests, we will continue to monitor their frequency and adjust our plan as necessary.



Translation requests for FY17 totaled 16,416, a 23.7% increase from FY16 (13,267).



In 2017, we received more than 800 requests for translation via 311. A majority of these requests were for information about social service programs that help New Yorkers remain in their homes. As shown in the table below, the forms most frequently requested for translation via 311 are our Spanish-language Rent Freeze program applications. The provision of translation and interpretation services increases participation in these important programs and helps individuals address significant (and in some cases, life-altering) challenges with more information and a greater degree of confidence.

Form/Language request	# of Service Requests
SCRIE - Application for Seniors Not Enrolled - Spanish	289
SCRIE Initial Application - Spanish	138
Application for Disability Rent Increase Exemption - Spanish	78
Property Tax Exemption App - English	44
SCHE Renewal Application - Spanish	43
SCRIE - Application for Seniors Not Enrolled - Russian	29
DRIE Initial Application - Spanish	28
SCHE Renewal Application - Chinese	21
Property Tax Exemption Application - Spanish	15
SCHE Renewal Application - Russian	15
SCRIE - Application for Seniors Not Enrolled - Bengali	15
Property Tax Exemption Application - Chinese	14
SCRIE - Application for Seniors Not Enrolled - Chinese	11
SCHE Renewal Application - Korean	10
SCRIE Initial Application - Russian	10
Application for Disability Rent Increase Exemption - Russian	7
SCRIE - Application for Seniors Not Enrolled - Korean	7
DHE Renewal Application - Chinese	6
DHE Renewal Application - Spanish	6
SCRIE - Application for Seniors Not Enrolled - Haitian	6
DRIE Initial Application - Russian	5
Property Tax Exemption App - Chinese	4
Property Tax Exemption Application - Korean	4
DHE Renewal Application - Russian	3
Parking Ticket Hearing Guide - Chinese	3
Application for Disability Rent Increase Exemption - Bengali	2
Parking Ticket Hearing Guide - Spanish	2
Property Tax Exemption Application - Russian	2
90 Day Notice of Intention to Sell Liens - Russian	1
Application for Disability Rent Increase Exemption - Creole	1
Parking and Camera Violation General Information Brochure Chinese	1
Parking and Camera Violation General Information Brochure Spanish	1
Property Tax Exemption App - Russian	1
Property Tax Exemption App - Spanish	1
Property Tax Exemption Application - Bengali	1
Property Tax Exemption Application for Owners - Chinese	1
SCHE Renewal Application - French	1
SCRIE Initial Application - Chinese	1
TOTAL	827

V. Provision of language access services

The Department of Finance provides language access services to the LEP community in a variety of ways through staffing and vendors. Per Local Law 30, we provide translated documents in the ten prescribed citywide languages:

- Arabic
- Bengali
- Chinese
- French
- Haitian Creole
- Korean
- Polish
- Russian
- Spanish
- Urdu

We contract with Geneva Worldwide for translation and Voiance for telephonic interpretation. Absent these contracts, we would not be able to provide the breadth of languages or the high level of accessibility that we currently offer. The agency has designated two employees in the External Affairs Division to lead this work. These employees serve in the roles of language access coordinator and language access liaison in addition to their regular responsibilities.

Additionally, our contract with Geneva also includes the ability to procure in-person interpretation for large-scale public events.

Our language access services are provided whenever and wherever DOF is open for business. In the event that a natural disaster or other city-wide emergency should necessitate the closure of our offices or affect our ability to serve customers by phone, translatable notice will be posted on our website.

The Department of Finance 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.

As much of our language is, by its nature, technical and complex, we employ a full-time editor to help our subject matter experts communicate plainly. The editor is responsible for enforcing the conventions of the style guide and working with our webmaster and graphic designer to present

information in an eye-catching and easy-to-follow format. Our aim is to simplify the language to the greatest degree possible before translation.

Several members of the External Affairs Division regularly attend trainings and meetings on the subject of plain language. Most recently, the editor and 311 liaison attended the DCAS “Writing in Plain Language” course and clinic, and they are currently developing an internal plain language training for DOF staff.

When a public-facing document has been finalized, the editor, the assistant commissioner for External Affairs, the 311 liaison, the webmaster, and appropriate staff members from the Correspondence unit determine whether it should be translated. The following criteria are considered:

- **Reach:** How many people will receive or need to read the material?
- **Relevance:** How important is the information that is provided in the document?
- **Sunset date:** For how long will this information remain relevant? Some materials are time-limited in nature, while others have greater longevity.

Documents are then prioritized by deadline. For example, some forms, such as the Senior Citizen Homeowners’ Exemption application, must be submitted by a certain date, while other documents, such as our guide to parking ticket hearings, are general and informational in nature and not subject to any particular deadline.

The annual tax lien sale process exemplifies our procedure. This process is a last resort tool that DOF uses after taxpayers fail to respond to multiple notices informing owners that they are behind on their taxes. While the audience for this mailing is relatively small (approximately 20,000 properties), the content of the notices is very important: for many owners, inclusion in the tax lien sale process is a step toward foreclosure. As such, the notice is available in ten languages via 311 and our website:

Notice of Property Value (NOPV)

Every January, the Department of Finance mails New York City property owners a Notice of Property Value (NOPV). This important notice has information about your property’s market and assessed values. The Department of Finance determines your property’s value every year, according to State law. The City’s property tax rates are applied to the assessed value to calculate your property taxes for the next tax year. You get your first tax bill for the year in June. If you believe the values or property descriptions on the NOPV are not correct, click [here](#) for information on what you can do.

[Access Your Notice of Property Value](#)

What is your Notice of Property Value?

اللغة العربية | বাংলা | 中文 | français | kreyòl ayisyen | 한국어 | Polski | русский | español | اردو

<http://www1.nyc.gov/site/finance/taxes/notice-of-property-value.page>

Another example is the notice of property value, or NOPV, sent each January to every property owner in New York City. This important notice, with information about a property's market and assessed values, is sent to approximately 1.2 million property owners. We provide a translated information sheet that explains what the NOPV is and how property owners can get help if they do not understand the information it contains.

Lien Sales

When you do not pay your property taxes, water bills, and other charges against your property, these unpaid charges become tax liens that may be sold in a tax lien sale.

Each year, the Department of Finance sells tax liens. If your property has unpaid debt that qualifies for a lien sale, we will sell your lien debt (the amount owed) to an authorized buyer. A lien servicing company, on behalf of the buyer, adds more fees and interest to your debt, so it is much better to take care of your debt before we sell the lien.

We send you at least four (4) notices before your lien is sold telling you about the sale and advising you to pay your debt(s) so that your property's lien does not get sold.

Depending on your type of property, there can be as many as four conditions that make your property eligible for the sale. Use [this table](#) to understand the rules that apply to your property.

90-day Notice of Intention to Sell Liens - Includes detailed information and frequently asked questions about lien sales.

اللغة العربية | বাংলা | 中文 | français | kreyòl ayisyen
한국어 | Polski | русский | español | اردو

<http://www1.nyc.gov/site/finance/taxes/property-lien-sales.page>

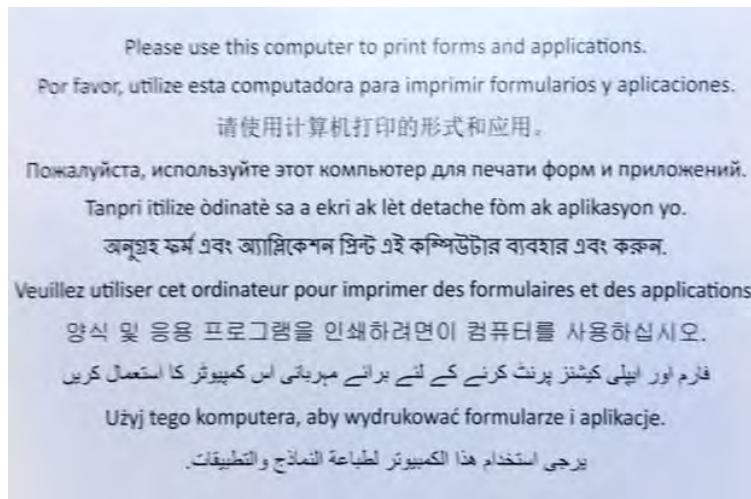
While the Department of Finance has prioritized language access in terms of breadth, we are also seeking to improve the quality of translations to ensure readability. The agency's language access coordinator is working with the budget office to seek a new contract with companies who can review our translations for clarity and comprehensibility, to ensure that our more technical language can be understood by an LEP audience.

To routinize the translation of the agency's most important documents, we have incorporated translations into our standard operating procedure for forms that are updated annually. As previously mentioned, when a form is newly created, we determine whether translation is necessary. When a previously translated form is updated, the file is sent immediately to Geneva for translation. There is sometimes a lag between the publication of our English and translated forms, and a priority for the agency going forward is to reduce the amount of time that it takes to produce and post translated documents.

The following section illustrates how the Department of Finance provides and advertises the telephonic interpretation services that it procures from Voiance. While access is at the core of

Local Law 30, the agency also strives to meet high standards of quality. Voiance quality-checks its product by having supervisors monitor interpreters as they assist customers, and DOF’s various business units submit monthly reports to the language access liaison to document and address any problems they have experienced with the service.

In-person: Signs advertising DOF’s free interpretation services are posted prominently throughout our public service areas. In addition, our business centers, located in each of the five boroughs, offer computer kiosks at which members of the public can download translated forms, notices, applications, and other documents. Signage is also displayed at the kiosks:



DOF employees who serve the public in these locations present “I Speak” cards to customers with limited English proficiency. The cards allow customers to point to the language in which they would like to communicate.

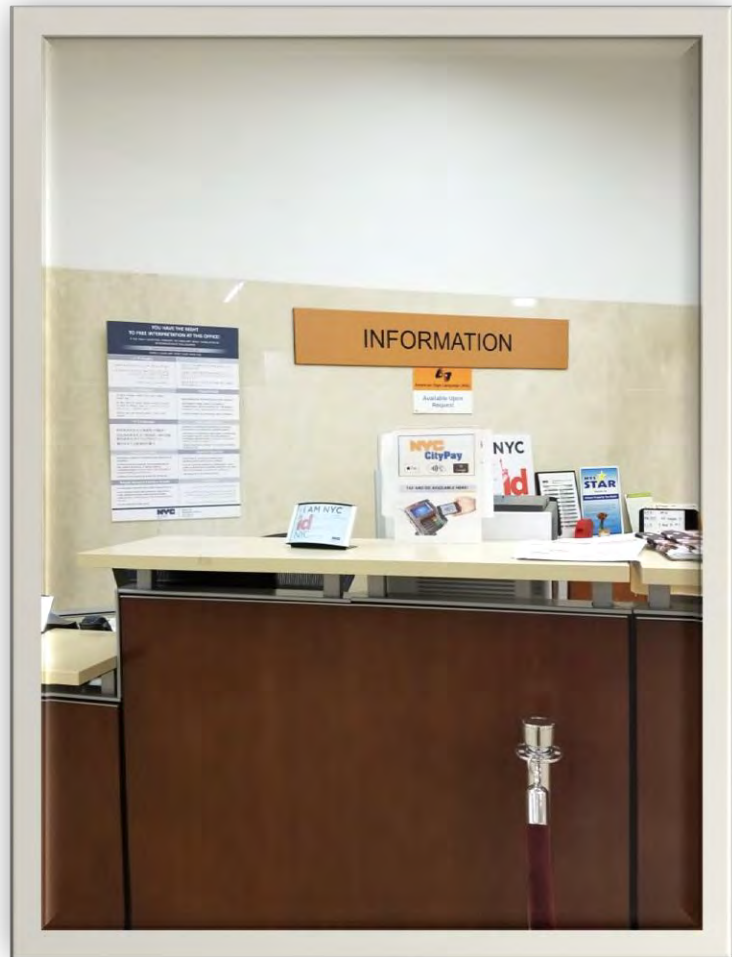


Given that many DOF employees speak more than one language, they are often able to assist constituents with limited English proficiency. (This is not a formalized offering to customers, nor is it a job requirement of staff.) If no multilingual employee is available, we utilize the over-the-phone interpretation system. As of April 2018, more than 375 employees have been trained on the program. The vendor, Voiance, employs interpreters who can determine the language needed when a DOF employee is unable to ascertain this information.

<p align="center">YOU HAVE THE RIGHT TO FREE INTERPRETATION AT THIS OFFICE!</p> <p align="center">IF YOU HAVE A QUESTION, COMMENT OR COMPLAINT ABOUT TRANSLATION OR INTERPRETATION AT THIS LOCATION</p> <p align="center">PLEASE TALK TO A MANAGER OR CALL 311</p> <p align="center">FILING A COMPLAINT WON'T HURT YOUR CASE</p>	
<p align="center">عربي/Arabic</p> <p>لديك الحق في تلقي خدمات ترجمة مجانية في هذا المكتب! إذا كان لديك سؤال أو تعليق أو شكوى بصدد الترجمة التي تلقيتها في هذا المكان، يرجى التحدث مع أحد المسؤولين أو الإتصال بـ 311. إن التقدّم بشكوى لن يضر قضيتك.</p>	<p align="center">한국의/Korean</p> <p>당신은 이 사무실에서 무료로 통역 받으실 수 있는 권리가 있습니다! 이곳에서 번역이나 통역에 관하여 질문, 의견, 또는 불만사항이 있으시면 매니저에게 말씀하시거나 311로 전화 주십시오. 불만사항 접수는 당신의 의외 사항에 아무런 영향을 끼치지 않습니다.</p>
<p align="center">বাংলা/Bengali</p> <p>এই অফিসে বিনামূল্যে অনুবাদ সেবা পাবার অধিকার আপনার আছে। এই স্থানে বাথ্যা বা অনুবাদ বিষয়ক আপনার যদি কোন প্রশ্ন, মন্তব্য বা অভিযোগ থাকে, তবে ব্যবস্থাপকের সাথে কথা বলুন বা 311 এ যোগাযোগ করুন। অভিযোগ জমা দান আপনার আবেদন এ কোন প্রভাব ফেলবেনা।</p>	<p align="center">Polski/Polish</p> <p>MASZ PRAWO DO INTERPRETACJI W TYM URZĘDZIE! JEŚLI MASZ PYTANIE, UWAGI LUB SKARGI O TŁUMACZENIU LUB INTERPRETACJI W TYM MIEJSCU, SKONSULTUJ SIĘ Z PRZEŁOŻONYM LUB ZADZWOŃ 311. ZŁOŻENIE SKARGI NIE ZASZKODZI TWOJEJ SPRAWIE.</p>
<p align="center">中文/Chinese</p> <p>你有权利在这办公室获取口译职务! 在这里如果你有关于笔译或口译的问题, 意见或投诉,请告诉经理或拨打311。 提出申诉不会影响你的案子。</p>	<p align="center">Русский/Russian</p> <p>ВЫ ИМЕЕТЕ ПРАВО ВОСПОЛЬЗОВАТЬСЯ УСЛУГАМИ БЕСПЛАТНОГО ПЕРЕВОДЧИКА В ДАННОМ ОФИСЕ! ЕСЛИ У ВАС ЕСТЬ ВОПРОСЫ, ЗАМЕЧАНИЯ, ИЛИ ЖАЛОБЫ ПО ПОВОДУ УСЛУГ УСТНОГО ИЛИ ПИСЬМЕННОГО ПЕРЕВОДА В ДАННОМ ОФИСЕ, СООБЩИТЕ МЕНЕДЖЕРУ ОФИСА ИЛИ ПО ТЕЛЕФОНУ 311. ПОДАЧА ЖАЛОБЫ НЕ ОКАЖЕТ НЕГАТИВНОГО ВЛИЯНИЯ НА ВАШЕ ДЕЛО.</p>
<p align="center">Français/French</p> <p>VOUS AVEZ LE DROIT A L'INTERPRETATION GRATUITE EN CE BUREAU! SI VOUS AVEZ UNE QUESTION, UN COMMENTAIRE OU UNE PLAINTE RELATIVE A LA TRADUCTION OU L'INTERPRETATION, N'HEситеZ PAS A VOUS ADRESSER A UN RESPONSABLE OU APPELEZ 311. LE DEPOT D'UNE PLAINTE NE NUIRA PAS VOTRE CAS.</p>	<p align="center">Español/Spanish</p> <p>USTED TIENE EL DERECHO DE OBTENER UNA INTERPRETACIÓN GRATIS EN ESTA OFICINA! SI USTED TIENE UNA PREGUNTA, COMENTARIO O QUEJA SOBRE LA TRADUCCIÓN O INTERPRETACIÓN EN ESTE LOCAL, POR FAVOR DIRÍJASE A UN GERENTE O LLAME AL 311. UNA QUEJA NO LE AFECTARA SU CASO.</p>
<p align="center">Kreyòl Ayisyen/Haitian Creole</p> <p>OU GEN DWA A YON ENTEPWET GRATIS NAN OFIS SA AI SI OU GENYEN YON KESYON, KOMANTE OSWA PLENT OSJE TRADIKSYON OSWA ENTEPWETASYON NAN LOKALITE SA A, TANPRI PALE AK YON RESPONSAB OSWA RELE 311. FE YON PLENT PAP BLESE KA OU.</p>	<p align="center">اردو/Urdu</p> <p>آپ کو اس دفتر میں مفت ترجمانی کا حق حاصل ہے! اگر آپ کے ذہن میں کوئی سوال ہے، کوئی بات کہنا چاہتے ہیں یا اس مقام پر ترجمے یا ترجمانی کے بارے میں کوئی شکایت ہے تو، کسی مینیجر سے رابطہ کریں یا 311 پر کال کریں۔ شکایت درج کرانے سے آپ کے کسی کو کوئی نقصان نہیں پہنچے گا۔</p>

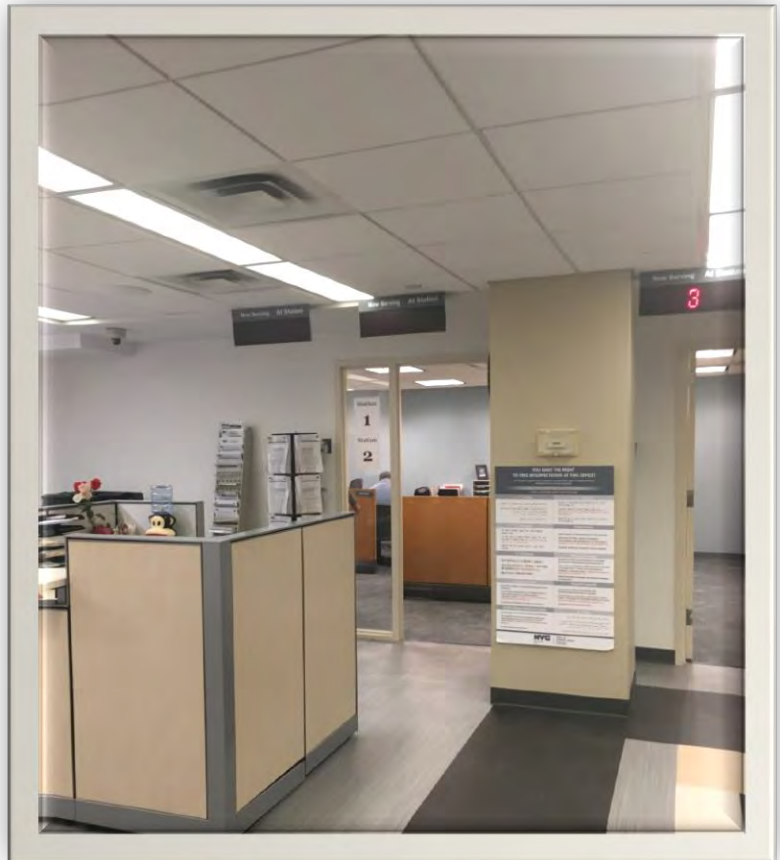
Brooklyn Business Center:

210 Joralemon St



SCRIE/DRIE Walk-in Center:

66 John St, Manhattan



Sheriff's Office:

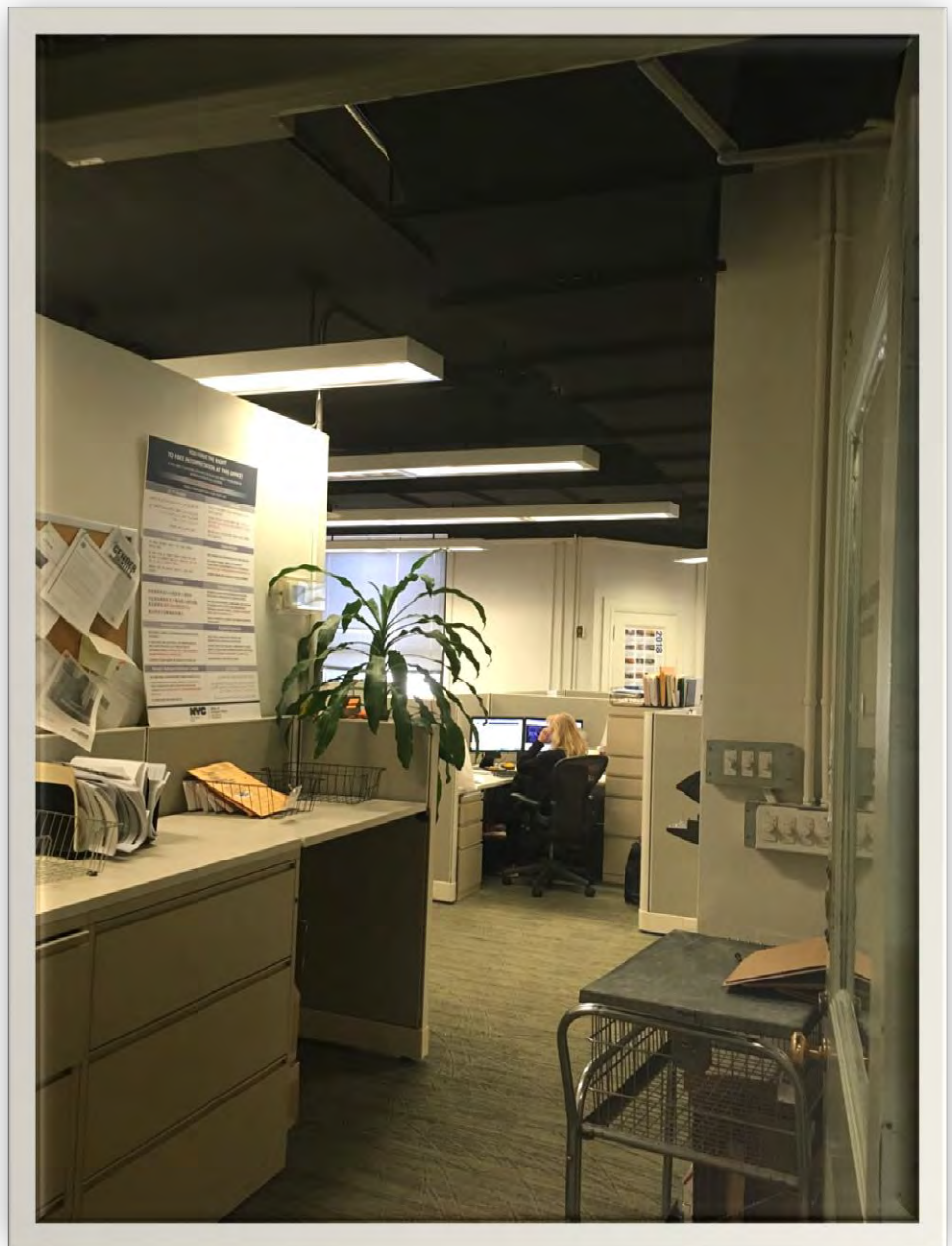
144-06 94th Ave, Queens



External Affairs

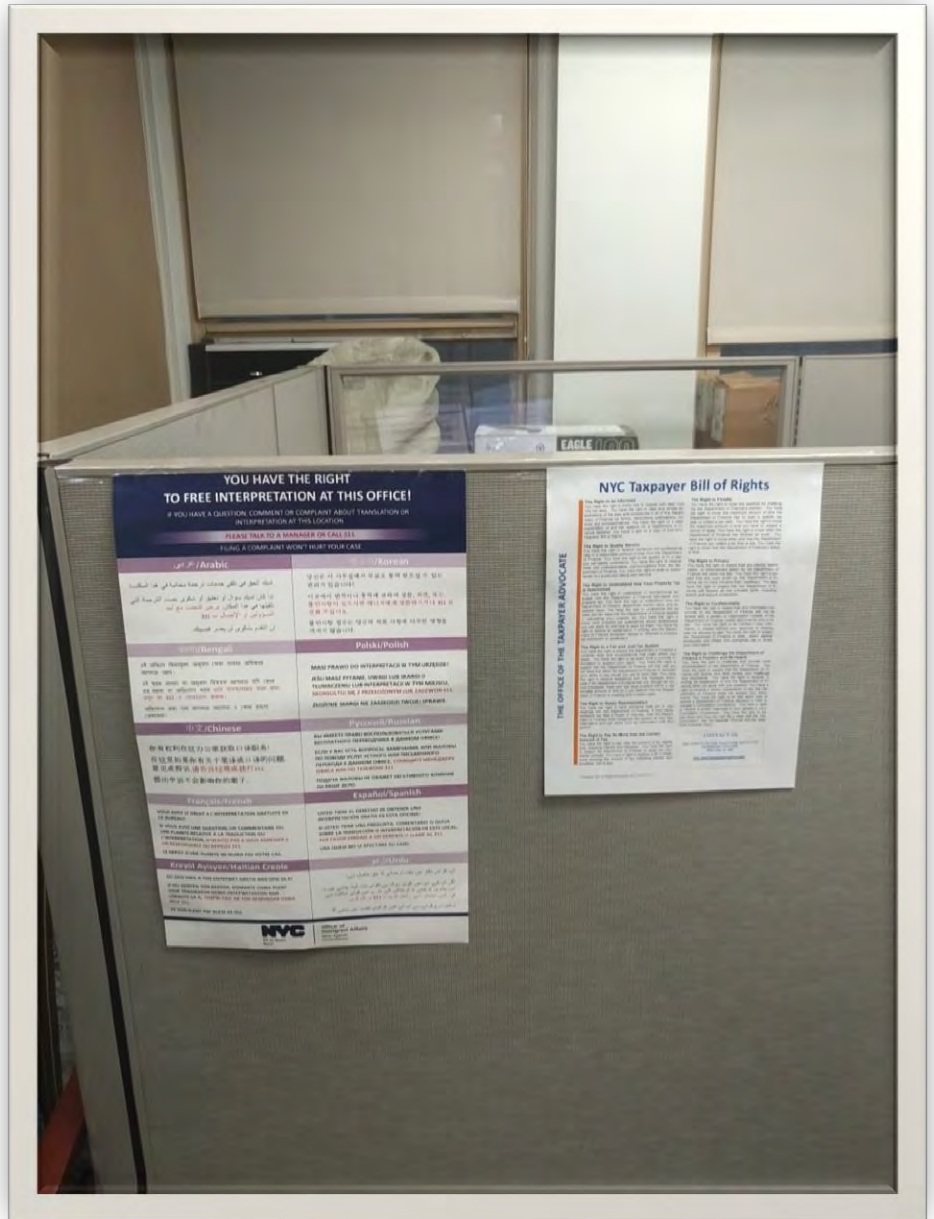
Division:

1 Centre St, Manhattan



Office of the
Taxpayer Advocate:

253 Broadway, Manhattan



Phone: Units that communicate with the public over the phone have been trained to use the interpretation system. Staff members are able to engage an interpreter via the same system available to in-person customers. This contracted service provides interpretation assistance in 299 languages, a full list of which is available in the [appendix](#).

Mail: Correspondence written in a language other than English is submitted to DOF's language access coordinator, who can either request assistance from a bilingual employee or submit a request for translation to our contracted vendor. Due to demand, some DOF business units have direct access to the vendor and may submit their requests for translation, which can generally be completed within 24 hours. On the whole, the agency receives very little correspondence in languages other than English.

Email and 311 service requests: Electronic communications come to the agency through a direct email form on our website or via the customer case record management program used in conjunction with 311. Depending upon the service requested, DOF may respond with a phone call using our telephonic interpretation system or via a written response in the language of the LEP customer.

In addition to one-on-one customer interactions, we also have a communications shop whose role is to share news stories and other information with the public. Our social media and press strategy incorporates languages other than English. Some examples include:

- When advertising the ECB Forgiving Fines program in October 2016, we posted in Spanish and Chinese on our Twitter feed, @NYCFinance.
- As part of our marketing campaign around the new Pay or Dispute parking app in 2017, we shared posts on Facebook and Twitter in both English and Spanish.
- We posted YouTube videos featuring Commissioner Jiha speaking in Haitian Creole about our Rent Freeze program.
- On Twitter, we advised the public that our tax class 1 property tax guide is available in 10 languages.

Social media isn't just about posting information, but about providing good customer service. In 2018, we received a tweet from a follower who asked if we would have a Mandarin translator at one of our NOPV outreach events, and as a result, we made sure to have someone there who could assist the customer.

We work with ethnic press across the city to publicize DOF programs and services, incorporating press opportunities (both earned and paid) in a range of languages. Our campaigns have included ads in *Chinese World Journal*, *Sing Tao*, *La Voz Hispana*, *Diario de Mexico*, and *Queens Latino*. In addition:

- We conducted an editorial board to develop relationships with ten prominent members of the Chinese press and introduce them to the agency's leadership.
- Our SCRIE/DRIE events have been featured in the *Korea Times*, *Korea Daily*, Univision, *Sing Tao*, *China Press*, *El Diario*, *World Journal*, and others.

- Commissioner Jiha has appeared on the Russian radio program *Davidzon Radio* and the Haitian Creole station *Radio Soleil*. He has also been featured on several Chinese television news shows, including *SinoVision TV*.
- Taxpayer Advocate Eunkyong Choi has been featured in the *Korea Daily*.
- The sheriff's chief of staff, Peter Sammarco, has appeared on CCTV, a Chinese television network operated by Reuters, and an Univision story featured one of our deputy sheriffs.



VI. Training

DOF understands the importance of training in the execution of Local Law 30, but also recognizes the importance of staff awareness agency-wide. All new Department of Finance employees 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. Employees are informed that more information can be found on DOF's intranet.

Employees who work in public-facing business units attend the Voiance training with the language access liaison. To date, more than 375 employees have been trained, an increase of 25% since the beginning of FY17. These business units include:

- External Affairs
- 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

The training provides information on:

- identifying a customer's primary language
- reporting requests for language services
- how to use dual handsets
- best practices for telephonic interpretation
- plain language, cultural competency, and disability communications

Once a year, the language access coordinator, in conjunction with HR, sends an agency-wide email that includes an overview of our language access work and its importance. This email ensures that each employee, regardless of division, is aware of our interpretation and translation services.

VII. Record keeping and evaluation

The Department of Finance uses internally and externally collected data to monitor trends in the LEP community. The language access coordinator receives monthly reports on interpretation and website translation requests from Voiance and the DOF webmaster. This makes it possible to regularly review the types of requests we are receiving and increase our translation efforts as demand grows.

On-site surveys help DOF determine where to post translated signs in public areas. The language access coordinator makes routine visits to our public-facing business units to make certain that language access signage is posted where required and that “I Speak” cards are plentiful. 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 coordinator is the first point of contact for business units that require assistance or clarification in the provision of these services. Complaints, comments, and requests for assistance received via phone (including 311), the web, email, and other channels are forwarded to the coordinator for research and resolution.

The language access coordinator is also involved in the review and assessment of the vendors that provide DOF with document translation and over-the-phone interpretation. The coordinator is the contact person for these vendors and provides them with end user feedback, which ultimately provides for better products and more efficient service.

The language access coordinator attends regular meetings scheduled by the Mayor’s Office of Immigrant Affairs. At these meetings, language access coordinators 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.

VIII. Resource analysis and planning

As previously mentioned, DOF has both a language access coordinator and a language access liaison. These individuals are staff members in the External Affairs Division and perform this work in addition to their regular responsibilities.

Our interpretation and translation vendors are critical partners in implementing language access. In FY17, DOF spent approximately \$175,000 on these two contracts, and we expect this amount to rise with the passage of LL30. The agency is also looking into an additional “reviewer” contract that would help ensure the quality of our translated documents.

IX. Outreach and public awareness of language access services

Pursuant to LL30 §23-1102b, Item #9, DOF’s strategy for creating public awareness is multi-pronged and encompasses all public communications and interactions produced and sponsored by the agency. Our outreach and public awareness efforts are referenced in the previous section on “Provision of language access services.”

Mail: DOF sends millions of pieces of mail per year. Mailings for which 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, Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu upon request. Call 311 for assistance.” (See below.)

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.

هذا إخطار هام من New York City Department of Finance. يرجى قرائته بعناية. لا يتوفر هذا الإخطار باللغة العربية إلا عند الطلب. اتصل على رقم 311 للمساعدة.

নিউইয়র্ক শহরের অর্থ বিভাগের থেকে এটি একটি গুরুত্বপূর্ণ বিজ্ঞপ্তি। অনুগ্রহ করে এটি মন দিয়ে পড়ুন। এই বিজ্ঞপ্তিটি অনুরোধের ভিত্তিতে বাংলাতে উপলভ্য। সহায়তার জন্য 311 নম্বরে ফোন করুন।

Un avis important de la part du Ministère des Finances de la Ville de New York. Veuillez le lire attentivement. Cet avis est disponible en français sur demande. Appelez le 311 pour demander de l'aide.

Sa a se yon avi Depatman Finans Vil New York (New York City Department of Finance) voye pou ou. Tanpri pran san ou pou w li l. W ap ka jwenn avi sa a an kreyòl ayisyen depi ou mande. Rele 311 pou jwenn asistans.

본 문서는 뉴욕시 재무부(NYC DOF)의 중요한 통지 사항을 담고 있으므로 찬찬히 읽어 보시기 바랍니다. 이 통지서는 한국어로 요청하실 수 있습니다. 지원 문의는 311 번으로 전화하십시오.

Ważne powiadomienie od Departamentu Finansów w Nowym Jorku. Należy je uważnie przeczytać. Powiadomienie jest dostępne w języku polskim na żądanie. Pomoc można uzyskać dzwoniąc pod 311.

Это важное уведомление от Департамента финансов города Нью Йорка. Внимательно ознакомьтесь в нем. По запросу уведомление предоставляется на русском языке. Если вам необходима поддержка, позвоните по номеру 311.

这是来自纽约市财政局 (New York City Department of Finance) 的重要通知。请仔细阅读。本通知可按要求提供中文版。致电 311 可获取协助。

Este es un aviso importante del Departamento de Finanzas de la Ciudad de Nueva York. Léalo con atención. El presente aviso está disponible en español si lo solicita. Llame al 311 para recibir asistencia.

یہ نیویارک شہر کے شعبہ مالیات (Department of Finance) کی جانب سے ایک اہم اطلاع نامہ ہے۔ براہ کرم اسے غور سے پڑھیں۔ درخواست کرنے پر یہ اطلاع نامہ اردو زبان میں بھی دستیاب ہے۔ معاونت کے لیے 311 پر کال کریں۔



Website: On the top right of the Department of Finance home page (www.nyc.gov/finance) is a translation link that customers can click for a dropdown list of available languages. When translations are available for a particular document, links are displayed below or beside it.

Examples:

Español ▶ Translate | ▼

বাংলা ▶ Translate | ▼

Kreyòl Ayisyen ▶ Translate | ▼

한국어 ▶ Translate | ▼

The screenshot shows the NYC Department of Finance website with a language selection dropdown menu open. The menu lists 48 languages, including Afrikaans, Albanian, Amharic, Arabic, Armenian, Azerbaijani, Basque, Belarusian, Bengali, Bosnian, Bulgarian, Catalan, Cebuano, Chichewa, Chinese (Simplified), Chinese (Traditional), Corsican, Croatian, Dutch, Esperanto, Estonian, Filipino, Finnish, French, Frisian, Galician, Georgian, German, Greek, Gujarati, Haitian Creole, Hausa, Hawaiian, Hebrew, Hindi, Hmong, Hungarian, Icelandic, Indonesian, Irish, Italian, Javanese, Japanese, Kannada, Kazakh, Khmer, Korean, Kurdish (Kurmanji), Kyrgyz, Lao, Latin, Latvian, Lithuanian, Luxembourgish, Macedonian, Malay, Malayalam, Malagasy, Maltese, Marathi, Mongolian, Myanmar (Burmese), Nepali, Norwegian, Pashto, Persian, Polish, Portuguese, Punjabi, Romanian, Russian, Samoan, Scots Gaelic, Serbian, Sesotho, Shona, Sindhi, Sinhala, Slovak, Slovenian, Somali, Spanish, Sundanese, Swahili, Swedish, Tajik, Tamil, Telugu, Thai, Turkish, Ukrainian, Urdu, Uzbek, Vietnamese, Welsh, Xhosa, and Yiddish. The dropdown is positioned over the main navigation area, which includes the NYC logo, a search bar, and a 'Text-Size' link.

Below the dropdown menu, there are four promotional tiles:

- Do Not Lose Your House Or Property:** Annual Property Lien Sale!
- Tentative Assessment Roll Published:** Image of a street with an American flag.
- Pay Parking Tickets in Cash at 7-Eleven Stores:** Image of a hand using a card reader.
- Pay or Dispute Parking Ticket App Now Available!** Image of a hand holding a smartphone.

At the bottom of the page, there are three columns of links:

- News and Updates:**
 - Get Lien Sale Help
 - Get Help With Your NOPV
 - FY19 Tentative Assessment Roll
 - Download Pay or Dispute App
 - More...
- Business:**
 - Business Tax
 - Tax Professionals
 - File & Pay Taxes Online
 - Ways to Save
 - Doing Business in NYC
- Property:**
 - Bills & Payments
 - Data and Lot Information
 - Property Tax Search & Pay
 - Borough-Block-Lot (BBL)
 - Ways to Save



<http://www1.nyc.gov/site/finance/taxes/property-reports.page>

Business centers: Signs advertising DOF’s free interpretation services are posted prominently in our five business centers. In addition, each center offers computer kiosks at which members of the public can download translated forms, notices, applications, and other documents. Signage is displayed at the kiosks, as well. Staff members present “I Speak” cards to customers with limited English proficiency. The cards allow customers to point to the language in which they would like to communicate.

Office of the Taxpayer Advocate: Since its founding in 2015, the Office of the Taxpayer Advocate, an independent office within the Department of Finance, has fielded over 2,000 inquiries from members of the public. The office’s caseload more than doubled from 2015 to 2017, and it continues to rise. Like the rest of the agency, the Taxpayer Advocate publicizes its translation and interpretation services.

Community events: The purpose of DOF’s public events is not merely to publicize our work, but also to provide on-the-spot assistance to customers in a variety of languages.

The DOF Outreach unit serves the public in libraries, community centers, parks, and other locations throughout the city. In 2017 alone, the unit participated in more than 400 events and served over 36,000 New Yorkers. These events feature palm-sized interpretation cards, access to over-the-phone interpretation services, and, when appropriate, translated materials. Additionally, members of the Outreach team speak French, Haitian Creole, Italian, and Spanish. For larger events, we maintain the ability to procure a professional in-person interpreter through Geneva.

In addition to the work of the Outreach unit, the Community Assistance Program in DOF’s Property Exemptions Administration works closely with over 100 community-based organizations, offering visits, conducting presentations, and organizing staff trainings. In 2017, they held approximately 150 of these partnered events, helping DOF reach a wide range of customers.

Examples of our events include:

- Tax lien sale process events
- NOPV notice events
- Councilmember town halls
- Rent Freeze enrollment events
- Senior living facility visits
- Homeowner clinics
- Housing resource fairs



X. Language access complaints

Through a partnership with 311, the Department of Finance has established a process to monitor and respond in a timely fashion to public complaints regarding language access. In 2017, as in 2016, the agency received only one such complaint. When 311 receives a complaint directed at the Department of Finance, our language access coordinator is notified. The complaint is then addressed through the appropriate business unit. DOF employs a similar process for complaints reported directly to the agency. The employee receiving the complaint will forward it to the language access coordinator for resolution. If the volume of complaints should increase in the coming years, DOF will develop a process to address them systemically.

How members of public can submit language access complaints, questions, and requests	Agency 311 Data (CY 2017)	Description of how complaints/requests were addressed
The public can submit requests, questions or complaints via email, phone calls, regular mail, in person at our business centers, or at outreach events attended by DOF staff. Submissions through 311 are handled by MOIA and forwarded to DOF.	<i># of language access complaints received via 311: 1</i>	Complaints via 311 are forwarded to the Language Access Liaison, who, under the direction of the Language Access Coordinator, responds accordingly.
	<i># of requests for language access services via 311: 827</i>	The requests for translated literature were either emailed by 311 operators or mailed by the DOF warehouse.

XI. Implementation plan logistics

As per LL30 §23-1102b, Item #1, External Affairs Assistant Commissioner Stina Skewes-Cox Trainor will serve as the Department of Finance's language access coordinator. She and the External Affairs Division are committed to updating this plan every three years, or sooner should she deem it necessary and/or prudent, as per §23-1102d. This plan will be made available on the public-facing Department of Finance website, www.nyc.gov/finance.

Language Access Goal	Milestones	Responsible Staff	Deadline
Send agency-wide email on Local Law 30 annually	Draft email; Process through HR for approval; Send agency-wide	Language Access Coordinator	5/31/2018
Present to DOF Cabinet Meetings annually	Create PowerPoint deck to present at bimonthly cabinet meeting	Language Access Coordinator	5/31/2018
Schedule recurring monthly Language Access meetings		Language Access Coordinator	5/31/2018
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 unit head	Language Access Liaison; 311 Liaison	7/1/2018
Expand translations for "Notice by Mail of Recorded Document" to include Arabic, Polish, and Urdu	Obtain quote from vendor; obtain approval from unit head	Language Access Liaison; 311 Liaison	7/1/2018
Expand translations for "Notice by Mail of Recorded Document" FAQ to include Arabic, Polish, and Urdu	Obtain quote from vendor; obtain approval from unit head	Language Access Liaison; 311 Liaison	7/1/2018
Expand translations for "Taxpayer Bill of Rights" to include Arabic, Polish, and Urdu	Obtain quote from vendor; obtain approval from unit head	Language Access Liaison; 311 Liaison	7/1/2018
Expand translations for "Deed Fruad Brochure" to include Arabic, Polish, and Urdu	Obtain quote from vendor; obtain approval from unit head	Language Access Liaison; 311 Liaison	7/1/2018
Assess and update DOF website to make translated forms easy to find		Web & Forms unit; Language Access Coordinator; Language Access Liaison; 311 Liaison; Editor	2/1/2019

Finalize new contract with "reviewer" vendor to ensure quality of translations	Seek vendors; Select Vendor; Process Budget Request	Budget Office; Language Access Coordinator; Language Access Liaison	6/30/2019
Expand most commonly used documents from ten to 15	Gather inputs from business units across the agency; Select five new documents to translate; Process documents through Geneva for translation; Post online, offer in public-facing units, advertise through comms shop	Language Access Coordinator; Language Access Liaison; 311 Liason; Web & Forms unit	7/1/2019

Name of form	Date last updated in English	Arabic	Bengali	Chinese	French	Haitian-Creole	Korean	Polish	Russian	Spanish	Urdu
What is Your Notice of Property Value (NOPV)?	Jan-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18
Homeowner's Exemption applications	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18
Rent Freeze applications	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18	Apr-18
Rent Freeze Guide for Tenants	Feb-15	*Jul-18	Feb-15	Feb-15	Feb-15	Feb-15	Feb-15	*Jul-18	Feb-15	Feb-15	*Jul-18
Property Brochure Tax Class 1	Jan-18	Mar-18	Mar-18	Mar-18	Mar-18	Mar-18	Mar-18	Mar-18	Mar-18	Mar-18	Mar-18
Property Brochure Tax Class 2	Sep-17	*Jul-18	*Jul-18	Jan-17	*Jul-18	*Jul-18	Jan-17	*Jul-18	Jan-17	Jan-17	*Jul-18
Notice by Mail of Recorded Document	May-16	*Jul-18	June-16	June-16	June-16	June-16	June-16	*Jul-18	June-16	June-16	*Jul-18
Got a Parking Ticket or Camera Violation?	Sep-17	Sep-17	Sep-17	Sep-17	Sep-17	Sep-17	Sep-17	Sep-17	Sep-17	Sep-17	Sep-17
90-Day Lien Sale Notice	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18	Feb-18
Taxpayer Bill of Rights	Nov-15	*Jul-18	Nov-15	Nov-15	Nov-15	Nov-15	Nov-15	*Jul-18	Nov-15	Nov-15	*Jul-18
Notice by Mail of Recorded Document FAQ	May-16	*Jul-18	May-16	May-16	May-16	May-16	May-16	*Jul-18	May-16	May-16	*Jul-18
Deed Fraud Brochure	Mar-17	*Jul-18	Mar-17	Mar-17	Mar-17	Mar-17	Mar-17	*Jul-18	Mar-17	Mar-17	*Jul-18

Appendix

Acholi (Sudan-Uganda) 264	Gujarati 083	Navajo 144
Afghan 265	Gulf Arabic 401	Ndebele 374
Afrikaans 224	Gwa 284	Neapolitan 249
Akan 016	Haitian Creole 129	Nepali 081
Akateko 418	Hakka 039	Nigerian Pidgin English 363
Aklan 120	Hamer-Bana 396	Norwegian 054
Albanian 070	Hausa 022	Nuer (Sudan) 294
Amharic (Ethiopia) 027	Hawaii Creole 285	Oromo (Ethiopia) 251
Apache 323	Hebrew 106	Paluan 296
Arabic 090	Hindi 082	Pampango 116
Armenian 072	Hindko 351	Pangasinan 114
Armenian (Eastern) 420	Hindustani 319	Papiamento 253
Armenian (Western) 421	Hmong 046	Pashto (Afghanistan) 110
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Assyrian 139	Huizhou 352	Pidgin English 254
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Baluchi 394	Ibanag 234	Polynesian 073
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Banda 267	Icelandic 133	Portuguese Creole 141
Bangi 268	Ilocano 113	Pothohari 358
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Bassa 314	Indonesian 050	Punjabi 080
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Bhutanese/Dzongkha 391	Jamican English	Romani 298
Bicol 118	Creole(Patois) 357	Romanian 066
Borana 382	Japanese 040	Russian 078
Bosnian 263	Jarai 411	Samoan 126
Brazil-Portuguese 270	Javanese 236	Saudi Arabic 400
Bulgarian 069	Jula 328	Senegalese 255
Burmese 042	Kachchi 371	Serbian 148
Cakchiquel 325	Kamba 412	Serbo-Croatian 299
Cambodian 048	Kanjobal 288	Shanghainese 037
Cantonese 031	Kannada 289	Sichuan/Szechuan 333
Cape Verdean 013	Karen 369	Sicilian 256
Catalan 132	Karenni/Kayah 384	Sindi 257
Cebuano 122	Kazakh 238	Sinhala 089

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Chamorro 403	Khmer 023	Slovakian 301
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Chin (Hakha) 406	Kongo 376	Suchown 258
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Chungshan 034	Kunama 370	Swedish 053
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Creek 348	Kurdish (Kurmanji) 372	Taechew 302
Crioulo 341	Kurdish (Sorani) 375	Tagalog 117
Croatian 067	Lakota 143	Taiwanese 033
Czech 063	Lao 043	Tamil 137
Dakota 271	Latvian 204	Telugu 303
Danish 055	Levantine Arabic 402	Temne 359
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Filipino 395	Mandarin 035	Uzbek 336
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Gallinya 280	Mola/Mossi 389	Yupik 146
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New York City
Department of Health and Mental Hygiene's
Language Access Implementation Plan

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Language Access Manager: Luis Valle
Language Access Coordinator: Ahram Kim

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 (DOHMH) is one of the largest public health agencies in the world. DOHMH is also one of the nation's oldest public health agencies, with more than 200 years of leadership in the field.

Every day, DOHMH staff protect and promote the health of 8 million diverse New Yorkers. The agency's work is broad-ranging: staff members inspect and grade dining establishments, provide dog licenses, work in low- to no-cost health clinics across the city, and provide birth certificates for our littlest New Yorkers.

DOHMH 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.

DOHMH addresses many health issues, including obesity, diabetes, heart disease, HIV/AIDS, tobacco addiction, substance abuse and the threat of bioterrorism. DOHMH also works to address enduring gaps in health between White New Yorkers and communities of color. Structural racism is at the root of these health inequities, which is why the 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),¹ providing language services is vital to the agency's mission and goals.

II. Agency Language Access Policy and Goals

The agency established its Language Access Policy in spring 2016 to eliminate language barriers to DOHMH 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 now with 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:

¹ U.S. Census Bureau, 2014 American Community Survey

1. Population Needs

- a. Emergency communications, legal notices and administration priority communications intended for all New Yorkers will be translated into any languages spoken by at least 1 percent of New York City's LEP population (**Appendix A**).
- b. All other communications will be translated into any languages spoken by at least 5 percent 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 clients upon request or if a need is identified. The City's contracted vendor can provide telephonic interpretation in more than 240 languages, and the Publications and Language Access unit can advise if a program identifies a language need that the vendor cannot address.

2. Permitted Language Services

- a. The following language services are permitted when interacting with LEP clients:
 - i. Publications that are written in plain language and professionally translated
 - ii. Professional interpretation, including telephonic interpretation, in person interpretation and American Sign Language interpretation
- b. The following language services are permitted under certain conditions:
 - i. Multilingual staff can provide direct language services (services in a non-English language) in non-medical settings. Professional interpretation services are the gold standard when interacting with LEP clients; however, when neither a proximal (i.e. face-to-face) interpreter nor a telephonic interpreter (via LanguageLine) can be secured, multilingual staff, who have passed a fluency assessment, can provide direct services in non-medical settings. In medical settings, multilingual staff can provide direct language services when giving general guidance or information (such as hours, directions, etc.).
 - ii. Medical staff who wish to provide services in a non-English language must have done **one** of the following:
 1. Completed a bilingual fluency assessment for medical vocabulary
 2. Completed medical school training in the non-English language
 3. Provided medical services in the non-English language for two years. The services must have been provided in a country where the non-English language is spoken widely.
- c. The following services could be at risk of violating privacy rights, causing confusion and/or placing LEP clients at risk for medical errors, and are therefore not permitted by agency policy:
 - i. In-house translations, other than those completed by the professional translator(s) in the Publications and Language Access unit
 - ii. Interpretation help from children under 18 years of age
 - iii. In medical settings, interpretation help from friends, relatives, or staff who are not involved in the client's care or do not meet the criteria outlined in section B above
- d. If an LEP client declines interpretation services in a medical setting, it is DOHMH policy to:
 - i. Reiterate that language assistance is free and is the client's right
 - ii. Explain that providing language assistance is required by agency policy
 - iii. Call an interpreter even if the client chooses to use a friend or relative

3. Mandatory Trainings

The Publications and Language Access unit will train DOHMH staff on the Language Access Policy and how to provide meaningful access to services for LEP clients at new hire orientations and annual trainings for specific types of employees:

- a. New hire orientations include a brief presentation on:
 - i. The agency’s mission to promote health, racial equity and social justice
 - ii. Permitted language services, as defined in section B above
 - iii. Services provided by the Publications and Language Access unit
- b. Division-specific annual trainings are required for the following staff:
 - i. Those who have the potential to interact with LEP individuals
 - ii. Those whose job it is to arrange for language services
 - iii. Program directors

4. Hiring Multilingual Staff

DOHMH encourages divisions to take language skills into account when hiring so the agency can better serve New York City’s LEP clients. 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.

5. Performance Measurement

- a. To measure progress and language access needs, the agency will report on the number of staff trained in language access. Divisions that provide services to the general public will also record the number of LEP clients served and the type of language services required.
- b. The Publications and Language Access unit will assess progress by:
 - i. Collecting and reporting on vendor and divisional data for language services provided
 - ii. Performing one visit per month to different public-facing sites to ensure availability of:
 1. Translated documents on the premises that are already printed or ready to print
 2. Translated informational or directional signs
 3. Signs that inform clients of free interpretation services
 - iii. Conducting annual agencywide language access and secret shopper surveys
 - iv. Reviewing the citywide language access secret shopper survey results
 - v. Scheduling quarterly meetings with the agency’s communications and language access liaisons to review survey results and discuss needs

III. LEP Population Assessment

In response to Executive Order 13166 , “Improving Access to Services for Persons with Limited English Proficiency”² in 2002, the U.S. Department of Justice developed the following “four-

² <https://www.gpo.gov/fdsys/pkg/FR-2000-08-16/pdf/00-20938.pdf>

factor analysis”³ 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.³

The Department of Health and Mental Hygiene took into consideration these four factors in writing and implementing our Language Access Policy and will continue to do so in the planning 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 2014 American Community Survey¹. 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 essential program documents and communications be translated into any languages spoken by at least 1 percent of New York City’s LEP population based on U.S. census data¹. As of 2013 these languages were: Spanish, Russian, Cantonese, Haitian Creole, Korean, Bengali, Mandarin, Italian, Polish, Yiddish, Arabic, French and Urdu. 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

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 Access 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..*

³ <https://www.gpo.gov/fdsys/pkg/FR-2002-06-18/pdf/02-15207.pdf>

DOHMH serves more than 8 million New Yorkers from diverse, cultural and economic backgrounds. The agency's services range from performing inspection grades for dining 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 access team to contact our telephonic interpreter vendor during LEP client interactions. The Health Department uses vendor data as proxy for frequency 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 services directly to the public. Through its clinics, hotlines, restaurants and child care inspectors, Action Centers and disease detectives, DOHMH 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 access 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 grantee/recipient and costs.*

DOHMH provides telephonic interpretation in more than 240 languages, as well as in-person interpretation (spoken and ASL) to its clients. The contract with these vendors is over \$630,000. The agency also provides professional translations of materials for target populations and the general public through the use of a professional translation vendor and two review vendors. The agency has contracts and purchase orders of over \$1.3 million dollars. 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.

As part of the Language Access Policy, the agency developed, with the help of a professional 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. As of date, more than 150 clinical and nonclinical staff have taken the assessment and passed with favorable scores.

IV. Provision of Language Access Services

1. Interpretation Services

a. How will you provide interpretation – both over the phone and at service centers?

All DOHMH 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.

Some of our health clinics also have access to video-remote interpretation for American Sign Language interpretation. We are currently working with our contracted vendor, 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 vendor Geneva. As public community events and hearings are under the jurisdiction of Community Affairs, the language access coordinator acts as an intermediary between programs and Community Affairs. The language access coordinator helps 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.

- b. Will you use the DOITT citywide contract for LanguageLine and/or other vendors? Will you use existing bilingual staff?

DOHMH 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. 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 help provide services to clients who don't speak English very well. 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 will also have the option to take a standard fluency assessment to prove competency in a certain language. 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.

- c. 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."⁴ DOHMH 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 helps them track it. We are currently looking for ways to create a standardized system of collecting language access data 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

⁴ www.lep.gov

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 with 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 access team also works with the digital communications department to upload all essential program documents and notices to the agency's website. The agency created a Language Services webpage where LEP clients who have access to Internet can navigate to our resources and services in their respective language.

In terms of continuity of agency service to LEP persons, the Office of Emergency Preparedness and Response (OEPR) team consulted with the language access team to create and evaluate language access protocols for during and after an emergency. We have protocols in place for canvassers to identify LEP residents and their respective primary language to be able to provide appropriate services during and after a disaster. (Please see **Appendix D** for a language access roadmap)

OEPR front-line staff have, and will continue to be trained on an annual basis, on culturally and linguistically-appropriate interactions with LEP clients. For example, OEPR staff have been advised to introduce themselves as being from the Health Department (focus groups tells us the LEP populations of NYC have a favorable view of the agency) and to emphasize the fact that we are not interested in their immigration status.

d. How will you ensure that your contractor provides quality services?

The Publications and Language Access team will ensure that our interpretation and translation vendors provide quality services by continuing to have monthly meetings with our vendors. The language access team has created a shared document, available to all agency staff, where staff can report poor or insufficient services provided by our vendors. The monthly 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 some bureaus designate a language access liaison. The language access team meets with each liaison monthly and quarterly. Each liaison is tasked with helping each program identify essential or vital public documents. After careful vetting, the language access team translates these documents into the top languages (1 percent threshold) spoken by New York City's LEP population using our

citywide vendors. All Health Bulletins (the agency's most widely distributed public education documents), for example, are translated into the current agencywide designated languages.

b. How will you ensure that your contractor provides quality services?

Prior to sending documents for translation, the Publications and Language Access unit reviews them for plain language. DOHMH recognizes that if the English document is unclear, the vendor will not be able to provide a quality translation. Additionally, 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: legal notices, vital documents, 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 who also review LanguageLine-translated documents.

To ensure consistency and high-quality language services in agency translations, the Publications and Language Access 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.

c. Will you use existing bilingual staff?

To ensure the quality of all of our public-facing translated documents, in-house translations, other than those completed by the professional translators in the Publications and Language Access unit, are not permitted.

3. Outreach and Signage at Public Service Centers

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. These signs provide direction to clients and services offered to them.

b. How will you otherwise conduct outreach to inform LEP persons of these services?

The language lists created by the language access team, using census and programmatic data, inform each program's outreach. Based on these lists, programs translate outreach documents into languages spoken by at least 5 percent of their eligible or active population. Our marketing and social media team also advertise our services in different languages on radio, television and various social media platforms.

V. Training

The agency will provide the following mandatory trainings to help staff comply with DOHMH policies and provide meaningful access to services for LEP clients.

- a. Introduction to Language Access for New Hires: New hire orientation will include one slide and a brief presentation on:
 - i. The agency's mission to promote health, racial equity and social justice
 - ii. Permitted language services
 - iii. The Publications and Language Access unit's services
- b. Annual Language Access Training: With the help of the Publications and Language Access unit, each division will provide annual trainings for the following staff:
 - i. Staff who have the potential to interact with LEP individuals
 - ii. Staff whose job it is to arrange for language services
 - iii. Program directors

VI. 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 Publication and Language Access 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 administered by the Language Access Manager also ensures that our staff provide a level of interpretation services equal to that provided to our English-speaking clients.

The Publications and Language Access team has instituted a review process that includes reviewing documents to make sure they abide by plain and simple 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 Publications and Language Access 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 access team also keeps records of new-hire orientation and annual staff trainings and of all the programs' translated vital documents.

Evaluation

The language access coordinator will evaluate the progress of the language access implementation plan by:

- Compiling results from “mystery shopping” evaluations and site visits. The language access coordinator will use available data collected from agency programs as well as data from the Customer Service Group of the Mayor’s Office of Operations
- Surveying staff on their understanding of language access procedures. The language access coordinator will conduct the 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

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.

VII. 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, 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 \$1.3 million for translations and translation reviews and over \$630,000 for telephonic interpretation services. The language access team 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 nor tracking that data, the language access coordinator works with the program in developing a system for tracking such data.

VIII. 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 press releases about public services, 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. Divisions will, with assistance from the language access coordinator and the Office of Intergovernmental and Community Affairs, locate and provide written notification to these groups.

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.

IX. Language Access Complaints

Complaints about language access received through 311 are automatically upload to our IQ 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 on the monthly meetings.

X. Implementation Plan Logistics

The language access unit, currently consisting of the language access manager, language access coordinator and an intern, are responsible for coordinating DOHMH's language access services and will be involved in the implementation of the language access plan. The Publications and Language Access team will include any additional requirements needed by the language access plan under Local Law 30 into its existing Language Access Policy implementation efforts. The agency is thus on track to meet Local Law 30's deadline of 7/1/18 to provide language services for all purposes except the issuing of licenses, permits or registrations. However, as the Language Access Implementation Plan needs to be updated annually, major milestones in our plan will include:

Fiscal Year 2019

- Identify all agency essential documents and translate them into the designated agency-wide languages
- Conduct site visits to all public-facing sites
- Conduct annual training for all public-facing staff.
- Create a HealthNet training course for all agency staff about protocol and guidelines when providing language access services to LEP clients
- Continue providing fluency assessment to clinical providers who wish to provide direct services in a different language.

Fiscal Year 2020

- Improve agency-wide standards for tracking the intake of LEP clients
- Compile agency-wide language services data into language lists for all public-facing programs to use as a resource when providing services
- Provide language access services in the designated agencywide languages to clients who need licenses, permits or registrations.

Roles and Responsibilities of the Language Access Unit:

The language access unit is comprised of the language access manager, the language access coordinator and a language access intern. The language access unit will coordinate the implementation of the plan, with help from the agency and its liaisons. The language access unit will update the Implementation Plan, consult divisions on how to implement language access services for agency programs, compile data on and complete evaluations of the agency's provision of language access services, monitor quality assurance measures and coordinate staff training. The unit will also consult the agency's customer service liaison to implement the plan in accordance with other customer service policies. The unit will continue to work with division liaisons to help implement this plan.

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 Access 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, 2009-2013 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.

Nurse-Family Partnership (Active Clients)		
	Language	% of LEP Population
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.

Nurse-Family Partnership (Eligible Population)	
Languages	% of LEP Population
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 1

Appendix C. Language ID Sheet.



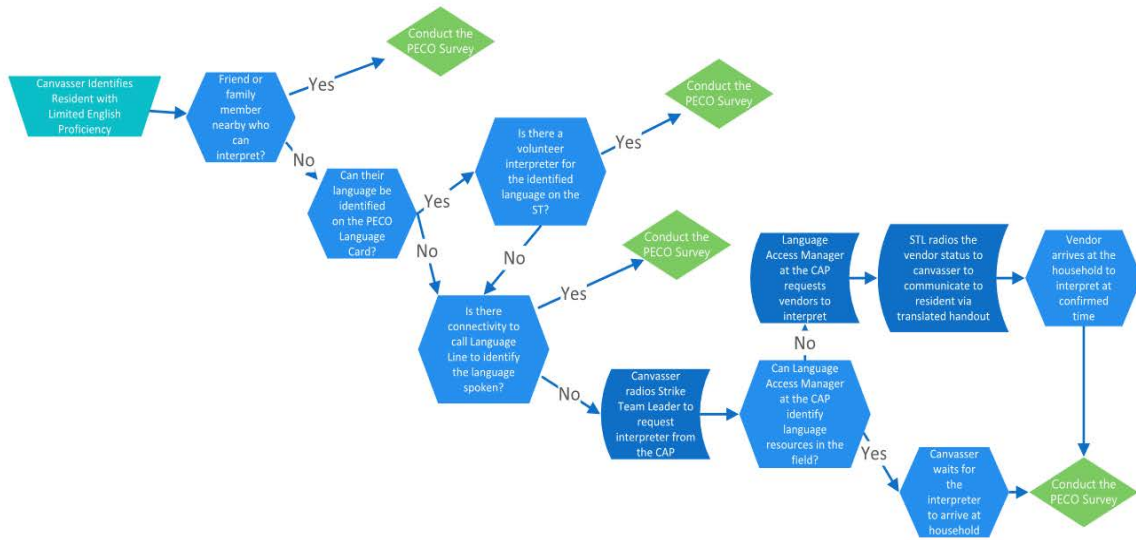
Language ID Sheet

<p>Español Spanish</p> <p>Tiene derecho a recibir servicios de idiomas gratuitos. Señale su idioma y llamaremos a un intérprete.</p>	<p>Русский Russian</p> <p>У вас есть право на бесплатные языковые услуги. Укажите ваш язык, и мы вызовем вам переводчика.</p>
<p>廣東話/普通話 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>Kreyòl ayisyen 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>한국어 Korean</p> <p>여러분은 무료 언어 서비스를 받을 권리가 있습니다. 사용하는 언어를 손가락으로 가리키시면 도와줄 통역사를 부르겠습니다.</p>	<p>বাংলা Bengali</p> <p>আপনার বিনামূল্যে ভাষা পরিবেশা পাওয়ার অধিকার আছে। আপনি কোন ভাষায় কথা বলেন তা জানান, আমরা আপনার কবে ডেউপার্টিক ডের করব।</p>
<p>普通话/广东话 Mandarin/Cantonese</p> <p>您有權享受免費的語言服務。請選擇您使用的語言，我們將為您提供口譯人員。</p>	<p>Italiano Italian</p> <p>Ha il diritto di ricevere servizi linguistici gratuiti. Indica la tua lingua e sarà nostra premura contattare un interprete.</p>
<p>Polski Polish</p> <p>Każdy ma prawo do korzystania z bezpłatnych usług językowych. Wskaz język, a my wywołamy tłumacza.</p>	<p>יידיש Yiddish</p> <p>איר האט די רעכט צו קענען ניצן אונזערע פארשטענדליכע שפראכן צו קענען די זאכן וואס איר ווילן זאגן און איר ווילן פארשטענדן. צייגט אונז וואס שפראך איר שפראך און איר ווילן פארשטענדן און איר ווילן פארשטענדן.</p>
<p>العربية Arabic</p> <p>لديك الحق في الحصول على خدمات اللغة المجانية. يرجى الإشارة إلى لغتك ومترجمنا مع مترجم توري للمساعدة.</p>	<p>Français 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>اردو Urdu</p> <p>آپ کو مفت لسانی خدمات یا حق حاصل ہے۔ اپنی زبان بتائیں اور ہم آپ کی زبان سے مترجم تلاش کریں۔</p>	<p>Ελληνικά Greek</p> <p>Δικαιούστε δωρεάν υπηρεσίες διαμεγέλειος. Δειχτε μας τη γλώσσα σας και θα καλέσουμε έναν διαμεγέλειος για να σας βοηθήσει.</p>
<p>Tagalog 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>Shqip Albanian</p> <p>Kenë të drejtën e shërbimeve gjuhësore falas. Zgjidhni gjuhën tuaj dhe ne do të telefonojmë një përkthyes për ju.</p>
<p>ਪੰਜਾਬੀ Punjabi</p> <p>ਤੁਹਾਨੂੰ ਮੁਫਤ ਭਾਸ਼ਾ ਸੇਵਾਵਾਂ ਦਾ ਹੱਕ ਹੈ। ਅਪਣੀ ਭਾਸ਼ਾ ਦੱਸੋ ਅਤੇ ਅਸੀਂ ਤੁਹਾਡੇ ਲਈ ਸਹੀ ਤਰ੍ਹਾਂ ਤੁਹਾਡੀ ਭਾਸ਼ਾ ਲਗਵਾਂਗੇ।</p>	<p>Português Europeu Portuguese</p> <p>Tem direito a serviços linguísticos gratuitos. Indique o seu idioma e será chamado um intérprete para si.</p>

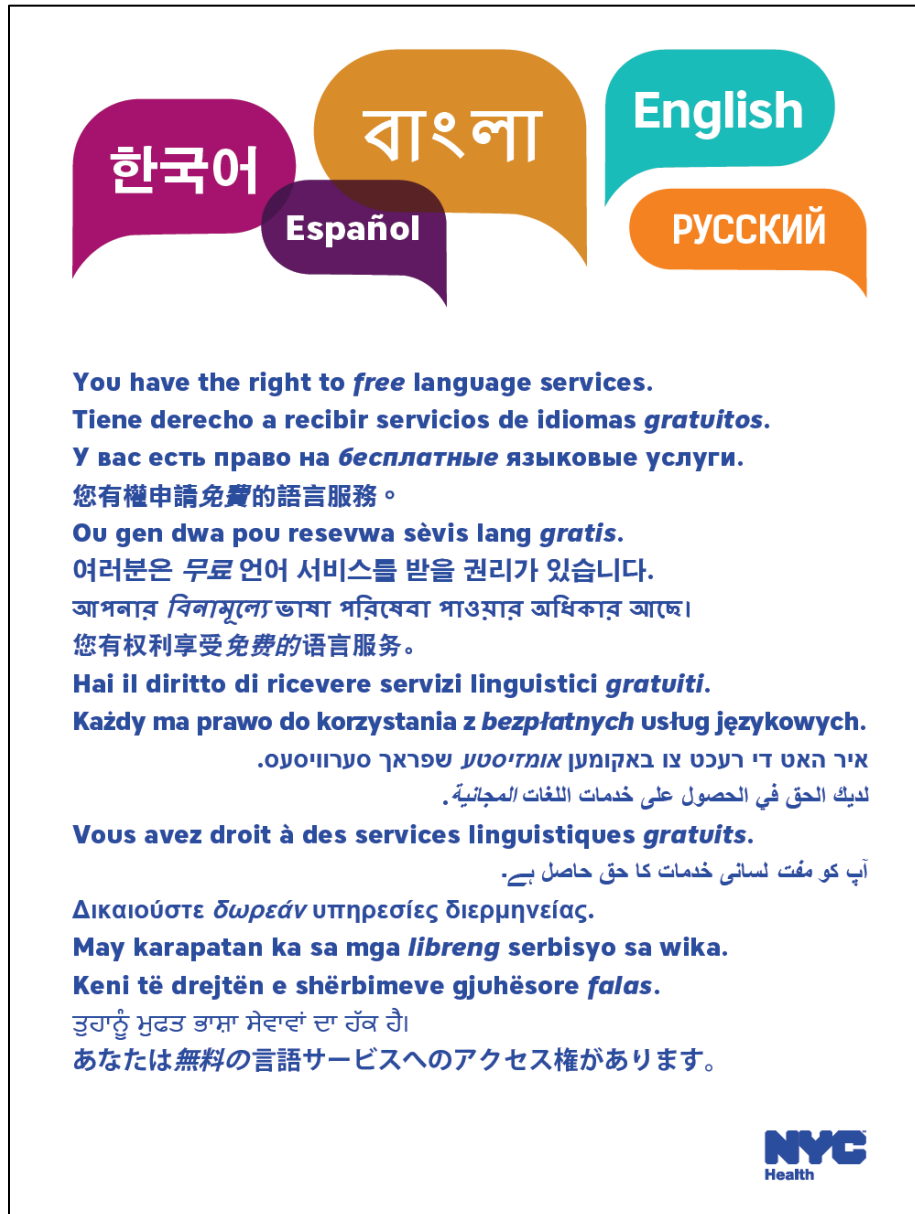


Appendix D. PECO Language Access Plan to be used during and after a city emergency.

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。

NYC
Health

LANGUAGE ACCESS PLAN

NYC Department of
Housing Preservation and Development
May 2018 Final Plan

Name and title of Language Access Coordinator:

Sean Soun, Executive Director of Operations, Human Resources.

I. 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 2,300 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.

II. Agency Language Access 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.

The Agency's Human Resources' Division will be primarily responsible for guiding implementation of the 2018 Language Access Plan ("Plan"). Human Resources will work in conjunction with language access liaisons from the Agency's divisions to implement this Plan. 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 two years to reflect the Agency's progress and next steps.

III. 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 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.	Multiple times per day	High
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	Assists in writing, vetting, and editing website and	Several times per week	Moderate

Communications	other communications channels; manages Agency social media accounts.		
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
Office/Division	Core Public-Facing Service	Frequency of Interaction With Public/LEP Persons	Level of Importance to LEP Population
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 (within the Office of Legal Affairs)	Communicates with residential and commercial tenants of City-owned properties and with persons serving legal papers on HPD.	Daily	High

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 two 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 2018 and 2019.

IV. 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, 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 Language Line for interpretation. Public-facing staff members who frequently interact with members of the public have access to Language Line phone lines in their service areas and can easily use the Language Line 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. 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 Language Line 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 Language Line for interpretation. Employees who frequently interact with members of the public have access to Language Line phone lines in their service areas and can easily use the Language Line to accommodate LEP persons by phone.

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.

The Agency is currently contracted with Language Line vendor, who is providing over 173 languages in addition to any other languages the Agency may request.

V. 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.

VI. 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.

VII. 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.

VIII. 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.

IX. 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.

X. 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 2018 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 January 2018
Standardize training across divisions	Review current training	Language Access Coordinator; Director of Training and Development	1 st Quarter 2018
Create LEP-specific emergency plan	Review current employee emergency plan	Language Access Coordinator; Emergency Preparedness Team	1 st Quarter 2018
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	2 nd Quarter 2018
Create marketing	Create sample	Language Access	3 rd Quarter 2018

materials to promote and encourage translation.	documents for review.	Coordinator, Assistant Commissioner of Human resources	(FY 2019)
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 th Quarter 2018 (FY 2019)
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

Sean Soun, Executive 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.



NYC Parks

Language Access Plan

City of New York Parks & Recreation

Parks Citywide Operations
July 2018

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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) individuals.

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 the Community Outreach & Partnership Development Division

I. 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 tree-related 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 patrons 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.

II. 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 patrons 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 patrons that interpretation services are available as well as to help identify the primary language that patrons speak.
- Phone interpretation services are always available in more than 100 languages currently through Language Line. To access phone translation services, staff are directed to call Central Communications at 646.613.1200 and request a translator for the language specified by the patron.
- 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 with your request.
- Staff should make an effort to offer interpreters for meetings with patrons where needed and/or requested. To arrange an interpreter for a meeting, please email Tiffany.Maynard@parks.nyc.gov with your request.
- Patrons may bring someone to interpret for them (this person should not be a minor), 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 ark facilities.
- To provide clear access for LEPs 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 seven languages: English, Spanish, Russian, Chinese, Haitian Creole, Korean, 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 patrons 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 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.
 - 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.

III. 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, Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, French and English.
- ~ NYC Parks will provide interpretation services in all available languages, including Spanish, Russian, Chinese, Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, French, and English, through its in-house Language Bank, Accurate Communications, and/or Language Line (where more than 100 languages are available telephonically).
- ~ NYC Parks will provide translation services in all available languages, including Spanish, Russian, Chinese, Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, French, and English, through its in-house Language Bank and/or Geneva Worldwide.
- ~ 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.
- ~ 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 will be involved in the Language Access 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.

IV. Provision of Language Access Services

NYC Parks is taking the following steps to provide interpretation services:

- ~ NYC Parks will work to have foreign language proficient 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, Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, and French. 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.
- ~ 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 Language Line at walk-in facilities using dual 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 customers and will instruct staff on how to communicate that primary language effectively to Central Communications if resources outside the facility are needed.
- ~ In the event of an emergency declared by the NYC Office of Emergency Management (OEM), Parks will communicate and continue to provide services to LEP customers by updating our website with directions and content distributed by OEM. Parks provides access to website translation, and where possible, we will send staff to sites to provide onsite services in customer languages. For calls that come into our Central Communications office, we will use our current telephonic language translation vendor (Language Line) to translate accordingly.

NYC Parks will take the following steps to translate essential documents.

- ~ NYC Parks’ list of essential documents for implementation in this plan include: permit 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 with symbols for features and services like basketball courts or bathrooms in each park.
- ~ 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 will contract for translation services with Geneva Worldwide, Accurate Communications, and Language Line, and also provide translation services and quality control using its internal Language Bank.

NYC Parks will take the following steps to develop signage relating to the Language Access Plan:

- ~ 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, Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, and French, 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 the 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.

V. Training

Parks will take the following steps to introduce the Language Access Plan to staff and to 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 the Parks Plant will provide introduction and regular 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 will organize 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 2018.
- ~ 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.

VI. 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 will develop an inspection report to cover signage, availability of translated materials, and language identification posters, and will look into the feasibility of adding 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.

VII. Resource Analysis and Planning

Parks will take the following steps to implement this plan using existing agency and inter-agency 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 the Geneva Worldwide, Accurate Communications, and Language Line contract, or an equivalent, to augment translation services and provide back-up interpretation services. To monitor costs, only Parks Central Communications and Community Outreach will be 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.

VIII. 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. In order 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 patrons, 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.

IX. 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.

X. 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.

- ~ NYC Parks will continue to use Language Line, Geneva Worldwide, 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.
- ~ 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.
- ~ 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.
- ~ NYC Parks will continue training and refresher training for all staff, especially staff at recreation centers, pools and permit offices, to assist LEP patrons and to understand the goals and tools involved with this plan.
- ~ 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.
- ~ 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.
- ~ NYC Parks will continue to expand the translated content provided on the website.

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 UPS 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.

Appendix 1:

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
Total	201,826	100.0%
English Only	54,728	27.1%
Language other than English	147,098	72.9%
LEP	80,625	39.9%
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
Total	125,102	100.0%
English Only	61,985	49.5%
Language other than English	63,117	50.5%
LEP	25,278	20.2%
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
Total	120,922	100.0%
English Only	84,145	69.6%
Language other than English	36,777	30.4%
LEP	13,297	11.0%
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
Total	113,343	100.0%
English Only	52,861	46.6%
Language other than English	60,482	53.4%
LEP	23,214	20.5%
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
Total	207,726	100.0%
English Only	154,121	74.2%
Language other than English	53,605	25.8%
LEP	11,698	5.6%
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
Total	184,183	100.0%
English Only	132,653	72.0%
Language other than English	51,530	28.0%
LEP	14,168	7.7%
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
Total	140,315	100.0%
English Only	96,856	69.0%
Language other than English	43,459	31.0%
LEP	13,191	9.4%
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
Total	140,373	100.0%
English Only	102,747	73.2%
Language other than English	37,626	26.8%
LEP	8,355	6.0%
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
Total	157,698	100.0%
English Only	72,404	45.9%
Language other than English	85,294	54.1%
LEP	44,537	28.2%
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
Total	143,876	100.0%
English Only	106,269	73.9%
Language other than English	37,607	26.1%
LEP	10,206	7.1%
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)

Appendix 2

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
Total	100,792	100.0%
English Only	47,196	46.8%
Language other than English	53,596	53.2%
LEP	19,976	19.8%
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
Total	131,973	100.0%
English Only	96,033	72.8%
Language other than English	35,940	27.2%
LEP	12,341	9.4%
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
Total	118,201	100.0%
English Only	71,448	60.4%
Language other than English	46,753	39.6%
LEP	11,810	10.0%
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
Total	121,562	100.0%
English Only	51,120	42.1%
Language other than English	70,442	57.9%
LEP	28,336	23.3%
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
Total	151,589	100.0%
English Only	57,499	37.9%
Language other than English	94,090	62.1%
LEP	40,068	26.4%
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
Total	115,372	100.0%
English Only	32,351	28.0%
Language other than English	83,021	72.0%
LEP	40,229	34.9%
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
Total	121,291	100.0%
English Only	33,458	27.6%
Language other than English	87,833	72.4%
LEP	45,101	37.2%
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
Total	130,039	100.0%
English Only	38,389	29.5%
Language other than English	91,650	70.5%
LEP	44,793	34.4%
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
Total	172,412	100.0%
English Only	73,451	42.6%
Language other than English	98,961	57.4%
LEP	44,881	26.0%
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
Total	144,662	100.0%
English Only	49,415	34.2%
Language other than English	95,247	65.8%
LEP	49,750	34.4%
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

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)

Appendix 4

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
Total	164,639	100.0%
English Only	67,230	40.8%
Language other than English	97,409	59.2%
LEP	42,188	25.6%
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
Total	168,613	100.0%
English Only	26,740	15.9%
Language other than English	141,873	84.1%
LEP	80,837	47.9%
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
Total	237,331	100.0%
English Only	66,046	27.8%
Language other than English	171,285	72.2%
LEP	110,670	46.6%
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
Total	114,406	100.0%
English Only	45,756	40.0%
Language other than English	68,650	60.0%
LEP	34,105	29.8%
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
Total	189,273	100.0%
English Only	125,743	66.4%
Language other than English	63,530	33.6%
LEP	23,128	12.2%
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
Total	145,275	100.0%
English Only	56,729	39.0%
Language other than English	88,546	61.0%
LEP	38,641	26.6%
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
Total	134,413	100.0%
English Only	20,612	15.3%
Language other than English	113,801	84.7%
LEP	69,072	51.4%
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
Total	104,913	100.0%
English Only	39,461	37.6%
Language other than English	65,452	62.4%
LEP	27,325	26.0%
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
Total	128,949	100.0%
English Only	34,352	26.6%
Language other than English	94,597	73.4%
LEP	51,074	39.6%
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
Total	157,704	100.0%
English Only	75,867	48.1%
Language other than English	81,837	51.9%
LEP	35,532	22.5%
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
Total	138,302	100.0%
English Only	55,603	40.2%
Language other than English	82,699	59.8%
LEP	35,670	25.8%
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
Total	221,173	100.0%
English Only	157,780	71.3%
Language other than English	63,393	28.7%
LEP	32,672	14.8%
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
Total	126,772	100.0%
English Only	83,381	65.8%
Language other than English	43,391	34.2%
LEP	15,952	12.6%
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
Total	107,645	100.0%
English Only	74,618	69.3%
Language other than English	33,027	30.7%
LEP	14,976	13.9%
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

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)

Appendix 5

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

PUMA 3901: Staten Island Community District 3-- Tottenville, Great Kills & Annadale		
	Total	Percent
Total	157,474	100.0%
English Only	121,295	77.0%
Language other than English	36,179	23.0%
LEP	11,802	7.5%
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%

PUMA 3902: Staten Island Community District 2--New Springville & South Beach		
	Total	Percent
Total	124,859	100.0%
English Only	79,344	63.5%
Language other than English	45,515	36.5%
LEP	17,238	13.8%
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%

PUMA 3903: Staten Island Community District 1--Port Richmond, Stapleton & Mariner's Harbor		
	Total	Percent
Total	161,182	100.0%
English Only	106,327	66.0%
Language other than English	54,855	34.0%
LEP	20,133	12.5%
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

January 2018

**Phyllis R. DeLisio
Language Access Administrator**

I. 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. We are located in every borough across the City and provide 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

Annually, over 742 probation officers supervise more than 27,060 adults and 2,282 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, at 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

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.

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.

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 period of 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. The Department 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. The Department is utilizing 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

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.

encourages responsibility and accountability.

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 balancing the best interest of the child and the safety of the community. In some cases, placement of the child is recommended.

The Department 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 and the youth is returned to the courts.

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.

II. Agency Language Access Policy and Goals

Meaningful Access

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 particularly important as most discussions are regarding issues that could impact a client's freedom. It is DOP's goal to ensure that a client's primary language is never an obstacle to achieving 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 services. All language access services are provided to our clients free of charge.

With our younger population, Probation Officers may need to communicate with parents who may not speak English. Language access services are provided during these interactions as well.

It is the Department's policy to always provide our LEP clients with telephonic or in person language access services from contracted qualified interpreters. During field visits, Probation Officers are equipped with cell phones for the provision of telephonic language access services. 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 held during the field visit is verified through contracted language services.

The Department's kiosk reporting system, used by clients deemed to be low risk of offending has easy to follow instructions offered in 4 languages: English, Spanish, Chinese and Russian. In 2017, approximately 9,000 clients used our kiosks. Of the 9,000, 5846 Spanish speaking, 733 Chinese speaking and 289 Russian speaking clients chose their primary language at the kiosk. For a client who speaks a primary language other than the 4 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, DOP provides written translation and oral interpretation at DOP public events via contracted vendor services. DOP determines the needs of the LEP population attending these events through

the provision of a phone number to request language access services on advertising materials.

Every client is assigned to a specific Probation Officer who fosters a strong connection with the client during in office supervision visits. During an emergency at the office, the Probation Officer communicates directly with an LEP clients through the use of contracted telephonic interpreter services. Should a verifiable emergency occur on a client’s reporting day that prevents the client from attending the appointment, the client is excused for not reporting and rescheduled for another appointment.

III. LEP Population Assessment

Methodology for Language Assessment

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

Factors 1 and 2

DOP serves a defined population sentenced by a judge to court ordered supervision by Probation Officers.

Through DOP’s case management system the agency maintains data on the primary language of each client, the frequency with which each client meets with his/her assigned Probation Officer as well as the services provided to the client. The frequency with which each client is required to meet with his/her Probation Officer is determined by the level of supervision deemed necessary to ensure the client’s success in reaching targeted goals.

In 2017, the top 10 languages spoken by DOP’s LEP clients were Spanish, Mandarin, Cantonese, Russian, Polish, Haitian Creole, Punjabi, Urdu, Romanian, and Albanian. This targeted population of LEP individuals differs slightly from the top 10 languages under Local Law 30: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French and Polish.

Factor 3

DOP provides critical services to individuals sentenced to Probation by the courts. DOP ensures that individuals 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. Language access services are critical for our clients who speak limited English as a lack of clear

communication between a Probation Officer and his/her client may impact a client’s freedom. Therefore, it is DOP’s goal to ensure that a client’s primary language is never an obstacle to achieving 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 services that are provided free of charge.

Factor 4

In 2017, DOP spent \$33,219.00 on Language Line Telephonic Services and \$14,177 on in-person translation and sign language services. This reflects DOP’s commitment to provide language access services and to ensure that all clients have equal access to the services they need to lead successful lives outside the criminal justice system.

In 2017: 31 clients were provided face to face interpreter services and 134 were provided services in American Sign Language. 4285 telephonic language access service calls were provided in 37 different languages.

IV. Implementation Plan Logistics

DOP has been providing language access services to our clients for over 21 years through contracted services. These services include telephonic translation and face to face translation in more than 100 languages (including American Sign Language). In addition, through NYC’s Language Bank, 8 DOP employees are NY Certified in 5 languages to assist with unexpected interpreter needs at the boroughs and to review documents translated by contracted vendors in plain language.

Telephonic and in-person interpreter services are secured for the LEP client by his/her Probation Officer who engages directly with the individual during supervised meetings. For the in-person 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 to ensure full remedy. The fill-in form is reviewed for completeness and accuracy and is then e-mailed to the contracted vendor. The request is tracked until the vendor confirms that a face to face 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 present to assist him/her as needed.

I SPEAK/Language Identification posters and cards are clearly 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 via 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.

All forms/documents/information needed by DOP's LEP clients are provided directly to them by their assigned Probation Officers in their primary language.

On a regular basis, Probation Officers meet with their respective borough leaders to determine which documents are essential for effective communication with their LEP clients. These essential forms/documents are forwarded to the LAA who secures the services of a contracted vendor for translation in required languages and plain language. To date, Probation Officers have 31 documents translated in the Languages most spoken by our targeted population available to them on DOP's intranet.

As the primary language of every client is captured in our case management system at the very first intake appointment, DOP can determine the primary language most spoken by clients at each DOP location to target the distribution of flyers in the language most spoken by the clients at that office/borough.

The Commissioner's Executive Assistant, who is also the LAA, has been tasked with handling 311 complaints regarding language access services so they are resolved promptly and completely. In 2017, no complaints were received with regard to language access services. An excel spreadsheet will be maintained to capture data on language access complaints filed, the timeliness of the agency's response and the remedy provided.

Roles and Responsibilities

Each year, the Commissioner re-establishes her commitment to the provision of language access services to DOP clients via a written memo to all staff. The General Counsel, Director of Communications and Press, Deputy Commissioner of Administration, Director of Training and borough leaders form the agency's team for ensuring the provision of language access services to all LEP clients in compliance with all Executive Orders and Local Laws.

Under the direction of the Deputy Commissioner for Administration, DOP's LAA 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 LAA 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 and borough leaders determine which essential documents need to be translated to effectively communicate with LEP clients and make such request to DOP's LAA.

DOP's LAA collects data on the primary language needs of our clients based on the # of requests for telephonic and face to face interpreter services in each borough office to allocate sufficient funding. DOP determines the most commonly spoken language(s) at each borough office (based on the data collected) and places documents in these primary languages in client waiting rooms.

DOP's LAA 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 LAA 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.

Borough leaders work collaboratively with DOP's LAA to ensure that all staff: are aware of and have access to available resources for effective engagement with LEP clients, receive appropriate training, and comply with DOP's written language access policy.

V. Service Provision Plan

Interpretation Services

DOP has a contract with an in-person interpretation contracted vendor utilized whenever DOP's LEP clients are in need of assistance with language access. This service is available during supervision visits, courtroom hearings, at treatment and service providers and at agency public events.

Identifying Primary Language

When an individual is sentenced to probation by the court they are sent to respective DOP office to begin supervision. Upon arrival, the individual is met by a greeter who is trained in assisting LEP clients. The greeter brings the client to an Intake Officer who captures the client's primary language in DOP's case management system. The LEP client is assigned to a Probation Officer, who engages directly with him/her/they on a regular basis, ensures that the client's primary language needs are continuously met through contracted language access services and the provision of documents written in the client's primary

language to ensure that the client clearly understands what is expected of him/her/they, increasing the likelihood of compliance to court orders and success in finishing the term of probation.

Our LAA reviews the records of our language assistance service contractors, our case management data and canvasses the opinions of senior staff and clients to ensure services are targeted to the population at each individual location and that the services being provided meet DOP's commitment of excellence.

All flyers advertising events open to clients and the public provide a telephone number for a LEP to call to request language interpretation services at the event.

Signage at Probation Offices

Each DOP office displays "I SPEAK" posters at the entrance to and in all of our waiting areas where clients report to their Probation Officers for supervision. The "I SPEAK" posters are also made available at the entrance to venues for public events.

Most client waiting areas display a "Welcome Sign" in the many languages spoken by our clients.

VI. Training

Training on Language Access

Newly hired Probation officers are taught about language access services and the rights of LEP clients during the Academy. Among many other topics, Academy Training covers the responsibility to provide language assistance to our LEP clients. Officers are made aware of the agency's written policy/procedure notice which guides the training curriculum. Each PO is provided with a palm card explaining how to access telephonic services. Additionally, once assigned in one of the agency's borough offices, supervisors are available to show new officers how to access both telephonic and face to face interpreter services for LEP clients.

Waiting Room greeters 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.

A bi-annual review of Language Access Services and the rights of LEP clients is provided to all staff during mandated Right to Know Training.

The agency classroom training on diversity best practices also includes a piece on language access services.

VII. Record Keeping and Evaluation

Quality Assurance

DOP gauges language access effectiveness through supervisory reviews of language service provisions by our service providers, through client satisfaction surveys and review of data from language service providers.

All documents translated into the primary languages of DOP clients are translated by contracted vendors. The translated document undergoes a second review by a NY Certified employee to ensure correct translation in plain language.

Senior staff reports any dissatisfaction with language access service providers to the LAA who takes appropriate action to immediately remedy the problem. The Agency's ACCO also reports any problems with language access service providers to DOITT or DCAS who holds the master contract.

Record Maintenance

Our new case management system maintains the primary language of all DOP clients.

Our Language Services Administrator keeps records of our language assistance services via usage reports from our vendors.

VIII. Resource Analysis and Planning

Current Agency Resources

DOP is satisfied with the current language service providers which have proven time and time again to be reliable, timely and competent in translation and interpretation of the many languages our clients speak.

Implementation Logistics/Milestones

DOP's LAA will request that the Office Manager of each DOP office serve as a Language Access Ambassador to ensure that the agency's LAA is made aware of all upcoming agency events to provide translation and/or interpretation in the primary Languages spoken by the population at the event.

All advertising material for agency events will include a phone number for attendees to request language access services.

DOP will update its policy/procedure notice and training curriculum with the requirements of Local Law 30.

DOP will apply plain language principles to the development of all new materials distributed to clients and the public.

DOP's LAA will partner with MOIA and other agency partners to learn and share valuable information regarding new resources, new needs of LEP clients and best practices.

Given the increase in the use of all of our language services, DOP anticipates that the range of languages and volume of requests in the future will continue to grow. The agency will continue to adjust its language service contracts to meet the increase in demand and the requirement for developing materials in plain language.



DEPARTMENT OF RECORDS & INFORMATION SERVICES

Language Access Plan



NYC DEPARTMENT OF RECORDS & INFORMATION SERVICES LANGUAGE ACCESS PLAN

Name and Title of Language Access Coordinator:

Gerald Rosero, Special Assistant to the Commissioner

I. 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 within the Department that interact with the public: 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 19th 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 collection includes 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.

II. Agency Language Access Policy and Goals

The Department of Records and Information Services has updated its previous 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 receive professional treatment regardless of the language they speak. The agency will publish the Plan on its website and update the language access plan every three years or sooner if 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 directors of the divisions. The LAC will hold semi-annual meetings with the staff of these divisions to discuss and implement changes and improvements to the Plan. The LAC will also develop a reporting template which the division directors will use to submit quarterly reports. Each quarterly report will document the interpretation services received and the languages requested.

III. LEP Population Assessment

The Department will provide language access services in ten designated citywide languages: Spanish, Chinese, Russian, Korean, Bengali, Haitian Creole, Arabic, Urdu, French, and Polish. These ten languages were designated based on findings from an assessment conducted by the Mayor's Office of Immigrant Affairs.

This agency plan was updated and on its implementation was designed and rolled out with consideration given to the U.S. Department of Justice "four factor analysis."

Factor 1. The Department has three divisions that have direct contact with the public: The Municipal Archives, the Municipal Library and the External Affairs Group all located at 31 Chambers Street. According to the 2014 American Community Survey, the following are the top languages spoken at home by a Limited English Proficient (LEP) Population in New York City: Spanish, Chinese, Russian, Bengali, French Creole, Korean, Arabic, Yiddish, Italian, Urdu, Polish, and French.

It has been the agency experience that speakers of these languages are not our primary customer base. Even so, the agency will provide language access to patrons who are not English language proficient. In FY 2017, the Archives responded to 34,495 requests for copies of vital records and a total of 53,890 requests for information or research services (this figure includes the vitals, plus walk-ins, emails, etc.). None required language interpretation services. The Municipal Library received 1,702 requests for information or research service. No requests for language services was received. The agency hosts exhibits and has translated materials into Spanish, Chinese, Arabic and Braille.

Although in the past the agency has not received any requests for language services, the revised language access plan will build on the current capacity to provide language access. The plan and/or future updates will incorporate data to evaluate the language access needs of our customers, including identifying supplemental languages.

Factor 2. As stated above a review of language access requests for the last fiscal year shows there have been no language access requests submitted. This could indicate that researchers do not require language access services and do not need interpretation services. However, to ensure accuracy of language access needs, the divisions with direct public contact will maintain a service log, and document whether any interpretation services were performed. The divisions will gather this data from May 2018-September 2018. The monthly log will track how many patrons required interpretation services and which language was requested.

Factor 3. The Department strives to provide equal services to all our patrons no matter what language they speak. The updated Plan may bring in a new customer base that previously may have been unaware of our resources. 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 Plan will help the agency continue to respond promptly to all research requests no matter the language spoken by the

requestor.

Factor 4. The agency has in place a service contract 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. Our existing agency volunteer language bank, which currently can provide language interpretation in the following languages; Spanish, Cantonese, Italian, French, French Creole, Russian, Gujarati, Punjabi, and Hindi will be utilized to communicate one-on-one with an LEP patron.

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.

IV. Provision of Language Access Services

The Department will provide telephonic interpretation services in the divisions accessed by the public through VOIANCE a contracted DCAS vendor.

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 interpretation request may occur for a scheduled public program event.

Public programs events are usually held at 31 Chambers Street. In order to ensure interpretation services are available at a scheduled event, the Department will place 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 will have an embedded hyperlink that will provide the person the contact information of the agency's LAC. Interpretation requests must be received at least 3 days prior to a scheduled event. The Department is currently outreaching to DCAS to identify an in-person interpretation service vendor in order to have a contract in place and utilize them as needed.

Researchers and genealogist utilize the Library and Archives division; at this time, no documents or forms have been identified for translation. The Department will monitor this provision and adjust as necessary. The Department will review its existing order forms, such as the Birth and Death Certificate Applications, as well as the photo licensing agreement/permission

to publish forms to ensure they are following Plain Language Principles. If a future need arises for document translation, then the Department will utilize a DCAS vendor to provide those services. Language bank volunteers will review translated materials and provide feedback to the contracted vendor. The Language Access Coordinator will maintain the list of all translated documents and update the list as necessary.

The Department's website averages about 900,000 page views per year. 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. The Department will look to the Mayor's Office of Immigrant Affairs and DOITT for any guidance regarding this issue and will adhere to citywide standards.

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/shall also be available to assist emergency LEP needs.

V. Training

All front line workers and supervisors in the Municipal Library, Municipal Archives and External Affairs divisions will be required to attend a training on the Departments language access policies and procedures as set forth in the Language Access Plan. All staff attending the training will be required to sign a training attendance sheet. 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.

Some areas of training will cover: ensuring that the Free Interpretation Services poster are always visibly posted, identifying the primary language spoken by the patron using the "Language Identifications" tools, documenting requests for interpretation services, etc. The training will also cover how to contact the telephone interpretation contracted vendor when a patron needs this service, and how to handle and record language access complaints. The Department will incorporate cultural competency training as part of the agencies EEO training curriculum.

The LAC will maintain a list of all staff who have attended the training and report on this in the annual LL30 report.

VI. Record Keeping and Evaluation

The LAC will create a monthly 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 month; they will submit the log to the agency's LAC. The LAC will review these monthly 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 in order 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.

VII. 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, Russian, Gujarati, Punjabi and Hindi.

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 into our plan.

VIII. 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.

IX. 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.

In the 2017 Mayor's Customers Observing and Reporting Experience (CORE) Results, the Department received a 100% overall score because the divisions providing language access services, were evaluated and found to be accessible to LEP customers.

Informing Patrons of Free Translation and Interpretation Services: The agency has received the "You Have the Right to Free Interpretation" poster from the Mayor's Office of Immigrant Affairs, the poster will be displayed in

public areas.

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.

X. Implementation Plan Logistics

Identifying the Language Access Coordinator

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.
- Develop a process to determine when to revise the plan.

Updating Language Access Plan Logistics

- April 2018 - The Language Access Coordinator at DORIS will update the existing language access plan and submit a draft to the Mayor's Office of Immigrant Affairs by the end of the month.
- April 2018 – Evaluate whether to utilize MWBE certified Language

Access vendors for document translation and in-person interpretation services or utilize a DCAS approved vendor.

- May 2018 – Schedule Staff meetings with the Municipal Archives, Municipal Library, and External Affairs to begin to familiarize them with Local Law 30 and the agency’s revised language access plan.
- June 2018 -Hold training for all staff, which have direct access to the public on the agency language access plan and on contracted vendor services.
- May 2018 – Evaluate feasibility of language access option on agency phone system.

Major Milestones

- May 2018 - Update the agency employee volunteer Language Bank.
- May 2018 - Update Language Access Vendor Contracts.
- May 2018 – Develop language access policy/procedures.
- May 2018 - Meeting with agency staff to familiarize them with Local Law 30 and the updated language access plan – Divisions affected are the Municipal Archives, Municipal Library and External Affairs.
- June 2018 - Training staff on Language Access Services.
- Ongoing - The Language Access Coordinator will provide implementation updates through the quarterly report to the Commissioner and to the Division Directors. The quarterly report will include information such as complaints received via 311 and internally, along with milestones achieved.
- Ongoing - During the quarterly meetings, the language access coordinator, along with Division Directors, will have an opportunity to review the need to make modifications and/or update areas of the language access plan.



Language Access Plan

Department of Sanitation

City of New York

Language Access Coordinator

Debra Barreto, Deputy Director

Bureau of Community Affairs

2018

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I. 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's 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.

II. Agency Language Access Goals

The Department of Sanitation's primary services are to provide communities with refuse and recycling collection, street cleaning and snow removal. These City services do not fully depend upon consumer interaction; however, we are committed to providing Limited English Proficiency (LEP) individuals with free interpretation services and materials developed/implemented by DSNY, in compliance with the Mayor's Office of Immigrant Affairs (MOIA) guidelines. Although, service requests and complaints are handled through the New York City Customer Service Center (311) with its available language-line services, the Department 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.

The Department also remains committed to working with elected officials, community groups and immigrant/ethnic service organizations to provide outreach and education about Sanitation services and codes to LEP customers. Along with the use of City Planning demographic/census data, Sanitation staff obtains feedback from local community groups, service organizations and its field staff to assist in determining what language translation(s) may be helpful to a specific outreach or educational campaign. Written translations are based upon the Department's past experience with LEP needs encountered, or as part of community engagement, outreach and educational efforts for which interpretation is requested as necessary. The Agency's primary services (e.g. refuse and recycling collection, street cleaning and snow clearing) are provided geographically on a regular schedule and are not related or dependent upon the need for customer contact.

The Department of Sanitation is committed to updating its Language Access Plan and programs as may be necessary and whenever feasible. The LAP is periodically reviewed and revised accordingly.

III. 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. Frequentness of LEP persons come contact with services;
 3. Nature and importance of services provided to LEP persons;
 4. Resources available and costs to recipient.
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 2. Frequentness of LEP persons come contact with services: The Department does not operate “in person”/walk-in” centers. However whenever necessary, it serves the LEP community in multiple languages by way of bi-lingual staff who are invited to meetings/events, or with the use of translated material. Although most information may be neighborhood specific, commonly used informational material is available in the top 10 designated citywide languages.
 3. Nature and importance of services provided to LEP persons: While we understand 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. Our 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: The Agency’s available resources and costs to LEP clients continue to evolving. Because of our minimal interaction with the public and LEP clients, the NYC Customer Service Center at 311 is our primary source for public requests for services and/or information. Over the years, the DSNY has received very few service requests from LEP clients in languages other than English. 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 (typically under the 14-day City Hall mandate) to the LEP community. We are in the process of making language access line services available to staff; they will be provided with a guide and orientation on the use of the language line services.

IV. Provision of Language Access Services

The Department is in the process of securing its City-wide contract for language translation services. Where in-house or City language bank expertise may be available, efforts will be made to utilize them to translate and vet materials for accuracy in the delivery of information. The volunteer Language Bank remains a valuable source for Language Access needs.

The Department of Sanitation officials are kept informed of the availability of translated documents. In addition, 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.

The agency also 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 materials available for download and translation.

During major agency-related emergencies/weather events, (i.e., snow storms), 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 the language list provided by the Mayor's Office of Immigrant Affairs on the 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.

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. The City's 311 Customer Service Center has served as the Department's "hot-line information center" since assuming this responsibility for what was then the Sanitation Action Center in 2001. 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 over-the-phone interpretation services, Language Access Services are generally available to limited English proficiency customers. In the last year, the DSNY received only one (1) request via 3-1-1 which after investigation, turned out to be non-LEP related.

The Department of Sanitation does not operate “walk-in” facilities which are open to the public similar to those of other agencies. However, in an effort to address LEP customers, the Department provides the appropriate signage at our household special waste sites and at the several S.A.F.E. disposal events held during the year to assist residents to rid themselves of harmful household products. DSNY staff has 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.

Our community engagement and outreach staff is used to educate a variety of groups of constituents (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 when appropriate into our commonly distributed general information pieces. We plan to continue reviewing and translating print pieces as warranted into the top ten designated languages with links directing LEP clients to PDFs of the translated English print in multiple languages available on our website.

Our ongoing outreach efforts and community feedback enable the agency to keep current with communications 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. Due to the rising costs of printing, and in particular, for documents which require updates/revisions as new mandates/laws/codes are implemented, the agency provides a link on our website directing LEP clients to PDFs of English print documents/information translated into multiple languages.

V. Training

DSNY Department officials and outreach staff are kept abreast on Agency resources available in other languages, translation/interpretation contracts for services, etc. Up-to-date Language Access Service information and translated documents are available on our website and updated to reflect new information/translated materials. During periodic employee updates and training sessions attended by both existing and new managerial/supervisory personnel, appropriate staff is made aware of new language-related resources available to the public and for their own communications with LEP clients.

VI. Record Keeping & Evaluation

DSNY’s Bureau of Community Affairs which serves as the agency’s liaison to the Mayor’s Office of Immigrant Affairs will periodically, survey agency users of language access tools to determine, their effectiveness and utility. Using official contracted requests for interpretation/transition services along with the instances LEP customers use the “translate” feature on our website, metrics from the language access provider will be reported. Furthermore, any DSNY related inquiries and requests handled by way of the

New York City Customer Service Center -311 are recorded and available by the appropriate language.

VII. Resource Analysis & Planning

The Agency is currently working to finalize a contract for Language Access Line Services that will be available to staff who may interact with the public. The Department works closely with elected officials and the community boards in identified communities about specific programs such as the organics program and ensures that bilingual staff is available to address community needs. In addition, the DSNY has created its own “Hello I Speak” flyer for outreach staff to identify LEP individual’s language and be able to direct them to the appropriate materials. We also created badges for staff that speak languages other than English, so that LEP individuals will know who can better serve them.

VIII. Outreach and Public Awareness of LAS

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.

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 document translation via any approved translation service that may be contracted;
- 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.

IX. Language Access Complaints

The Department rarely receives complaints submitted in languages other than English. We continue to experience that the NYC Customer Service Center (311) handles the vast 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 (typically under the 14-day City Hall mandate) to the LEP community. We are in the process of making language access line services available to staff; they will be provided with a guide and orientation on the use of the language line services. In the interim, the DSNY has created a “Hello I Speak” flyer for outreach staff to identify LEP individual’s language and be able to direct them to the appropriate materials. We also created badges for staff that speak languages other than English, so that LEP individuals will know who can better serve them.

X. Implementation of 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 will be 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 be available to staff; they will be provided with a guide and orientation on the use of the language line services. 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 S.A.F.E Disposal 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.

XI. Milestones

The DSNY will work towards achieving the following goals in FY19 and FY20:

- Finalize contract with Language Line to provide access to all DSNY employees that interact with the public;

- Train all staff in the Bureau of Recycling and Sustainability, Bureau of Community Affairs and Bureau of Public Affairs in language access protocols and procedures;
- Develop and track all staff training;
- Continue review of educational/informational material for plain language usage;
- Translate the Zero Waste Bookmark into ten languages;
- Re-evaluate the definition of “commonly distributed” to potentially include more pieces based on new usage data;
- Work to improve our language PDFs database to include all flyers.



Language Access Plan

Department of Sanitation

City of New York

Language Access Coordinator

Debra Barreto, Deputy Director

Bureau of Community Affairs

2018

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- VI. Record Keeping & Evaluation
- VII. Resource Analysis & Planning
- VIII. Outreach and Public Awareness of Language Access Services
- IX. Language Access Complaints
- X. Implementation Plan Logistics

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Our community engagement and outreach staff is used to educate a variety of groups of constituents (i.e. property owners or building superintendents, merchants, etc.) utilizing multilingual material as needed. Due to changes in recycling and commercial laws/regulations, the agency will be updating its *Summary of Sanitation Rules and Regulations*. Once the update is completed we plan to translate this document into the top ten designated languages with a link directing LEP clients to PDFs of the translated English print in multiple languages will be available on our website.

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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.

XI. Milestones

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**2018 Language Access Implementation Plan:
Department of Homeless Services (DHS)**

- I. Agency Mission and Background**
 - a. Programs and Services Offered

- II. Agency Language Access Policy and Goals**
 - a. DHS's Policies around Language Access
 - b. Goals of DHS's Language Access Implementation Plan

- III. LEP Population Assessment**
 - a. US Dept. of Justice Four Factor Analysis
 - b. Language Access Needs of the Agency

- IV. Provision of Language Access Services**
 - a. In-person Interactions
 - i. Identifying a Resident's Language of Preference
 - ii. Telephonic Interpretation Services
 - iii. Bilingual Staff
 - iv. Video Interpretation Services
 - v. On-Site Interpretation Services
 - vi. Client Provided Interpretation Services
 - b. Over-the-Phone Interactions
 - c. Field and/or Home Visits
 - d. Hearings
 - e. Public Events (forums, town halls, etc.)
 - f. Public Notices and Mailings
 - g. Agency Website
 - h. Emergency Preparedness and Response

- V. Training**

- VI. Record Keeping and Evaluation**

- VII. Outreach and Public Awareness of Language Access Services**

- VIII. Language Access Complaints**

- IX. Implementation Plan Logistics**
 - a. Language Access Coordinator
 - b. Implementation Goals and Timeline
 - c. Implementation Plan Updates

The Department of Homeless Services (DHS) is a relatively small agency with a huge and important mission: preventing homelessness in one of the most expensive cities in the world and housing any New York City resident who has nowhere else to go.

In 2017, the administrative operations of DHS and the Human Resources Administration (HRA) were consolidated in order to better carry out that mission. Included in the new Department of Social Services (DSS) is the Office of Refugee and Immigrant Affairs (ORIA), a team of advocates working to ensure that immigrants and limited English proficient (LEP) New Yorkers have equal access to Agency benefits. Having a dedicated team give expert guidance on language access issues, manage language services contracts, review and advise on policies and procedures and conduct trainings has significantly increased DHS's capacity for providing language services.

In 2017, DHS piloted allowing shelter vendors to access DHS's telephonic interpretation services contract. When combined with the diverse, bilingual staff that work in shelters operated by non-profit providers, this access should ensure that all of our shelter residents are able to communicate with their case workers and get the housing support that they need in their own language.

DHS has also used the shared resources of DSS to improve the way that clients are notified of their right to interpretation services. In 2017, new "Free Interpretation Services" posters were hung at all DHS-run locations, making it clear from the moment that clients walk in the door that the Agency is a multi-lingual living and work space.

Finally, DHS has benefited from the shared contracting services of HRA and DSS. DHS now has access to on-site interpretation services for individual client appointments and for public meetings.¹ Even clients who are unable to use the phone can now communicate with DHS easily. At community meetings, members of the public will be able to receive Agency news and updates, as well as provide feedback, in a language that they understand.

DHS is committed to the changes that are being made in our Agency, but we still have work to do. Over the course of 2018 and early 2019, DHS and DSS will be working to ensure that every notice that we share with residents, applicants and members of the public is available in twelve languages. (Eleven translations plus English.) By going beyond the requirements of Local Law 30, DHS is in the process of creating a truly multi-lingual living and working space that reflects the diversity of our city.

Thank you for taking the time to review this Language Access Implementation Plan and learn more about the many ways that DHS programs and staff are working to prevent homelessness and ensure that ALL New Yorkers have a safe place to call home.

¹ Refers to on-site interpretation services for spoken languages. DHS has had access to on-site interpretation services for sign language for many years.

I. Agency Mission and Background

The Department of Homeless Services (DHS) works to prevent homelessness before it occurs, address street homelessness, and assist New Yorkers in transitioning from shelter and street homelessness to permanent housing. DHS collaborates with non-profit partners to provide temporary shelter and services that homeless New Yorkers need to achieve and maintain housing permanency.

In February 2017, the Mayor announced his comprehensive plan to turn the tide on homelessness in New York City, neighborhood by neighborhood. The plan's guiding principle is community and people first, and giving homeless New Yorkers, who come from every community across the five boroughs, the opportunity to be sheltered closer to their support networks and anchors of life, including schools, jobs, healthcare, family, houses of worship, and communities they called home in order to more quickly stabilize their lives and return to independent living in the community. These goals are best achieved through partnerships with those we serve, public agencies, and the business and non-profit communities.

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 the 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

In 2017, the administrative units of the NYC Human Resources Administration (HRA) and the 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 better work for more New Yorkers in need. This includes sharing resources for providing free and confidential language services, managed by the Office of Refugee and Immigrant Affairs (ORIA).

a. Programs and Services Offered

Shelter

Governed by a unique right to shelter mandate, New York City provides temporary emergency shelter to every man, woman, and child who is eligible for services, every night. This policy sets New York apart from municipalities across the nation—many of which turn homeless individuals and families away once shelters have filled up or simply put their names on a waiting list.

New York City's shelter system is consistently recognized as the most sophisticated and comprehensive in the nation. The City is also an innovative leader in the field of preventive services for those who are at

risk of becoming homeless. All New Yorkers should be proud to live in a city that focuses intently on prevention efforts at the forefront of its policies, while providing shelter as a safety net for those in need.

Before any New Yorker can enter shelter, he or she must first apply at the intake center that is designated for his or her family composition:

- Families with children under the age of 18 should go to Prevention Assistance and Temporary Housing (PATH), 151 E. 151st Street, Bronx, NY 10451
- Adult families (more than one individual, but none under the age of 18) should go to the Adult Family Intake Center (AFIC), 400-430 E. 30th Street, New York, NY 10016
- Single adult men should go to 30th Street Intake Center at 400-430 East 30th Street, New York, NY 10016
- Single adult women should go to either HELP Women's Shelter, 116 Williams Avenue, Brooklyn, NY 11217 *or* Franklin Shelter, 1122 Franklin Avenue, Bronx, NY 10456

Individuals and families who do not have other options available to them are then provided shelter in a location that is either DHS or vendor operated. All shelter sites, whether they are DHS or vendor-operated are required to have tools, procedures and resources for working with LEP residents in their preferred language.

Ombudsman

The Office of the Ombudsman is charged with resolving constituent issues and concerns through alternative dispute resolution methods, including mediation services. Experienced Constituent Services Representatives provide effective conflict resolution, and work to ensure fair and equal access to DHS, City, and community-based services and resources. The staff actively engages constituents and empowers them to participate in positive decision-making processes. With the goal of seeking independent and impartial issue resolution, the Office is responsible for:

- Providing information and education on homeless services
- Providing a supportive client experience through effective and compassionate listening, and timely client-focused case management
- Providing general assistance and communication facilitation, including service referrals and connections
- Addressing unresolved grievances or dissatisfied outcomes
- Evaluating and investigating client grievances
- Mediation
- Strategic data tracking and recommendations to DHS management

II. Agency Language Access Policy and Goals

a. DHS's Policies Around Language Access

Ours is a city of immigrants. In this ever-changing national climate, DHS and DSS are in the process of making changes that demonstrate our commitment to providing equal access for all New Yorkers, regardless of immigration status or language preference.

DHS is a multi-lingual work and living space. In 2017, the Agency sheltered a total of 112,715 individuals or families. Of those, nine percent, or 10,369 individuals/families identified their preferred language as something other than English. Collectively, our residents spoke almost 30 languages.

All DHS employees are required to work with every resident in his or her preferred language. Historically, the Agency has provided language services by using our bilingual staff and contracted telephone interpretation services. When needed, staff used on-site interpretation services for deaf/hard-of-hearing residents.

As of 2017, DHS staff also have access to video interpretation services for deaf/hard-of-hearing clients and on-site interpretation services for limited English proficient (LEP) residents in more than 100 spoken languages. Over the course of 2018 and 2019, DHS staff will be implementing a plan to meet the Agency's goal of creating a fully multi-lingual space, where all of the documents and notices given to clients will be in the eleven² city-wide translation languages: Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

b. Overall goals of DHS's language access implementation plan

In keeping with DHS's commitment to providing benefits and services to all eligible applicants, this plan ensures that language shall not be an obstacle to receiving shelter for individuals with limited English proficiency.

The goal of this plan is to guarantee that all eligible persons receive appropriate benefits without undue delay or difficulty based on language. Intake and placement should take no longer for LEP clients than it does for English proficient clients. All of the support services available to shelter residents should be available to all residents, regardless of language.

² DHS recognizes that Local Law 30 lists ten designated city-wide languages for translation, but the law does not designate which form of Chinese characters should be provided. Given the size of the Chinese reading population that the Department of Social Services (DSS) serves, the Agency has opted to provide all notices in both styles of characters, implementing the Local Law 30 mandate as eleven translations or twelve languages when counting English, rather than ten.

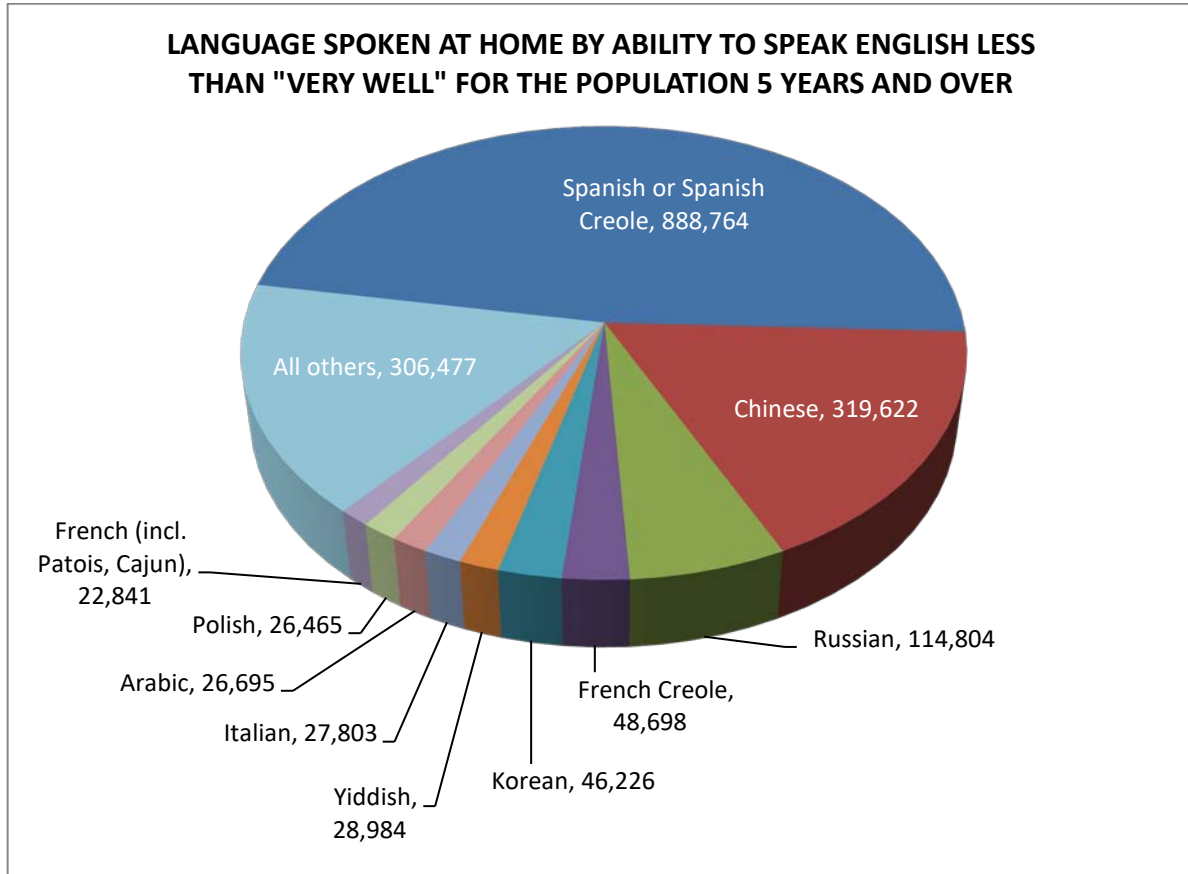
This Language Access Implementation Plan will inform DHS clients, applicants for benefits, the public, the Mayor's Office of Immigrant Affairs (MOIA) and the New York City Council about the language services that DHS provides and how they are provided.

III. LEP population assessment: U.S. Department of Justice “Four Factor Analysis”

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

According to the U.S. Census Bureau³, New York City residents who speak English less than “very well” are most likely to speak: Spanish, Chinese, Russian, French Creole, Korean, or Yiddish (see Figure 1).

Figure 1

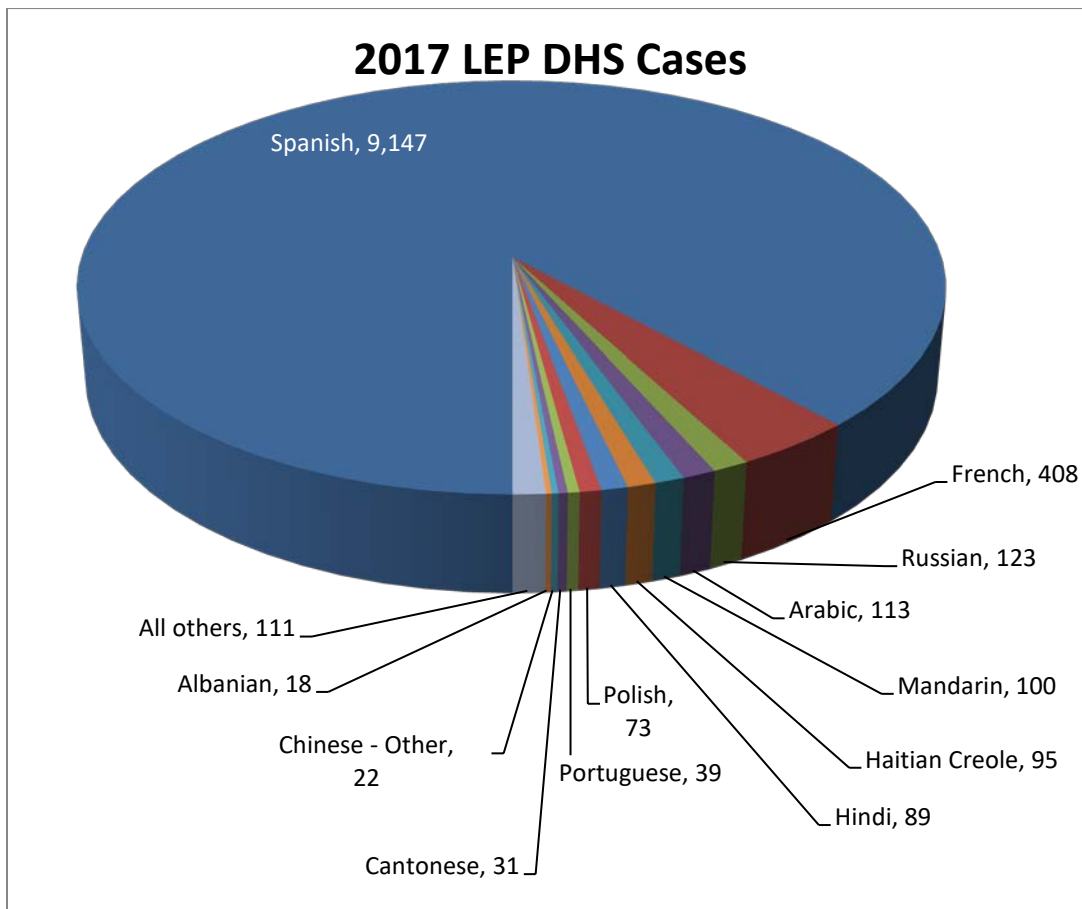


³ 2011-2015 5-Year American Community Survey

Factor 2 is an analysis of the frequency with which LEP individuals come into contact with the program.

In 2017, 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 English are Spanish, French, Russian, Arabic, Mandarin, Haitian Creole, Hindi, Polish, Portuguese and Cantonese. [see Figure 2]

Figure 2



Given the residential nature of DHS programs, the majority of the interactions between clients and staff occur in-person at intake centers and shelters. Clients do have the opportunity to call or write to the Ombudsman Unit to resolve complaints, case issues or shelter concerns. Staff meet with residents and landlords in the field as well. Finally, residents, applicants and members of the public receive written information from the Agency regarding their specific benefits and general information about programs and services offered.

Factor 3 requires an explanation of the nature and importance of the program, activity, or services provided by the program to people's lives.

The nature and importance of DHS stems from its mission to assist individuals in profound need of assistance. Temporary housing assistance is an essential city service to which all should have equal access. This plan reflects DHS'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 and clients have equal access to the services for which they are eligible, regardless of the level of their English proficiency;
- To inform all DHS applicants and clients 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 of providing various types of language services.

DHS primarily meets the needs of LEP residents through the use of bilingual staff and telephonic interpretation services (available in more than 200 languages). Deaf/Hard-of-Hearing clients are provided on-site interpretation services. DHS staff gained access to onsite interpretation for spoken languages and video interpretation for sign language in 2017. With these tools, DHS staff are expected to communicate with every resident in his or her language of preference.

The Agency uses outside vendors to provide written translation, on-site interpretation, telephonic interpretation, and sign language interpretation. These services are provided to residents through the citywide language service contracts provided through the Department of Citywide Administrative Services (DCAS).

In November of 2017, DSS was able to put in place a process for on-site interpretation services for LEP residents at DHS for the first time. (This service is distinct from sign language interpretation services.) Within DHS, it is expected that the use of this service will continue to be very low, as the large majority of DHS residents will be able to use telephonic interpretation service, but for those residents who do need the service, it will be an invaluable support.

As discussed in detail in Section IV.f, DHS is still in the process of creating both appropriate notices and distribution mechanisms for translated notices. It is expected that the Agency's use of written translation services will be much higher in coming years. DHS will not be translating into additional languages other than those required by LL30 because the Agency has a relatively small population of LEP clients and client needs will be met under the local law.

Type of Service	Vendor	2017 Instances	2017 Expenditure
Telephonic Interpretation	Language Line Solutions, Inc.	14,582	\$146,568.00
On-Site Interpretation (excluding sign language)	Geneva Worldwide, Inc.	0 (implemented 11/17)	\$0
Sign Language Interpretation	Accurate Communication, Inc.	144	\$28,367.16
Written Translation	Language Line Solutions, Inc.	50 documents	\$31,038.00
Total Costs			\$205,973.16

b. Language Access Needs of the Agency

DHS fully understands that effective communication in any language is essential for accessing our crucial services and programs. The Agency is firmly committed to ensuring that all New Yorkers, no matter their language of preference, can apply for and access shelter. While serving more than 8,000 limited English proficient New Yorkers per year requires a significant commitment, it is a commitment that the Agency is prepared to make.

DHS provides telephonic interpretation services in more than 200 languages, which means that the Agency is able to communicate with more than 99.5% of residents in their language of preference.

Between 2017 and 2019, DHS intends to make a significant investment in written translations. In order to meet the mandate of Local Law 30, all DHS forms must be cataloged, reviewed for plain language, free form text fields must be removed (to the extent possible), and then they must be translated into the eleven city-wide languages. At the same time, an entirely new document production process must be created in order to generate, print and distribute notices in languages other than English. By July of 2019, DHS is committed to being fully compliant with Local Law 30 by providing all notices in twelve languages.

IV. Provision of Language Access Services

a. In-Person Interactions

All DHS staff are required to work with every resident in his or her preferred language. To do this, staff must first correctly identify the resident’s language using a combination of tools.

Once an individual’s preferred language is identified, there are five ways for staff to meet the language mandate: they can use telephonic interpretation services, their own bilingual skills, video interpretation services, on-site interpretation services or the resident can provide his or her own interpreter.

1) Identifying a Resident’s Language of Preference

All direct interactions between DHS staff and residents begin with an offer of free language services. If a resident accepts the offer of language services, the second step is to identify his or her language of preference. Many residents self-identify their preferred language in English. Others are identified by the Agency’s diverse bilingual staff. In addition, staff can use the Language Card or our telephonic interpretation services vendor to identify a resident’s preferred language. An additional Notice of Free Interpretation Services will be available by the spring of 2018.

The Language Card

As of the summer of 2017, DHS staff are using the same Language Card as HRA staff. The Language Card is a folded card that contains the phrase: “Do you speak [name of the language]? Please be seated. I will call an interpreter for you.” This phrase appears in the following languages: English, Albanian, Arabic, Bengali, Bosnian, Cantonese (traditional characters), Mandarin (traditional characters), Haitian Creole, French, Greek, Hebrew, Hindi, Italian, Khmer, Korean, Polish, Russian, Spanish, Ukrainian, Urdu, Vietnamese, and Yiddish. It also includes the symbol for deaf/hard-of-hearing services. The card is available in two sizes, 11”x17” and 5”x7”.

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.”	Hindi	क्या आप हिन्दी बोलते हैं?	कृपया बैठ जाइए। मैं आपके लिए दुमासिरे की व्यवस्था करूंगा / करूंगी।
Albanian	Flisni shqip?	Uluni ju lutem. Po shkoj të thërras një përkthyes për ju.	Italian	Parla italiano?	Prego, si accomodi e attenda mentre Le chiamo un interprete.

Use of Telephonic Interpretation Services to Identify a Client’s Preferred Language

If a resident does not identify their preferred language on the Language Card, it may be because they speak another language or because they do not read in any language. At that point, staff can call

telephonic interpretation services and ask for a Client Services Representative. The representative can work with the staff member to identify the client’s language using various linguists.

Notice of Free Language Interpretation

By the spring of 2018, all DHS applications for shelter services will include an 8.5”x 11” notice of free interpretation services in their application packets. This notice, which will be shared with HRA, will read “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. In a Center, 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.” This message will be printed in English, Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

2) Telephonic Interpretation Services

Most frequently, DHS staff use professional telephonic interpretation services to communicate with residents who prefer to use a language other than English. In 2017, DHS used telephonic interpretation services more than 14,500 times.

In December of 2017, DHS began a pilot to extend the provision of telephonic interpretation services to contracted shelter providers. At the end of 2018, the Agency will review the additional costs and outcomes of this pilot with program leaders and shelter providers to determine the best mechanism for ensuring that all residents have access to language services from within the shelter.

The quality of the Agency’s telephonic interpretation services are confirmed by ORIA. ORIA staff track complaints and meet regularly with program staff and outside advocates to understand the experiences and concerns of individuals who have used the service. Complaints about interpreters or interpretation services are forwarded to our professional services vendor, who, when a specific call can be identified, has management staff listen to and review the call and take appropriate action. When complaints are more general, the vendor can create detailed reports of wait times, the number of calls and the number of interpreters available during a specific period.

3) Bilingual Staff

DSS (which includes both HRA and DHS) employs more than 2,100 individuals who speak a language other than English. Collectively, our staff speaks 128 languages.

DSS’s Bilingual Staff (as of 5/15/2017)

Language	Number of bilingual staff*
Spanish	1,303
Russian	406
Yoruba	211

French	203
Haitian Creole	197
Cantonese	137
Mandarin	123
Bengali	112
Hindi	101
Ukrainian	85
Urdu	58
Igbo	49
Arabic	44
Ibo	35
Malayalam	33
Nigerian Pidgin English	30
Punjabi	30
Hebrew	27
Polish	25
Italian	24
Tagalog	24
Toishanese	20
German	19
Portuguese	19
Gujarati	18
Vietnamese	16
Edo	15
Korean	15
Greek	12
Pidgin English	12
Tamil	12
Yiddish	12
American Sign Language (ASL)	11
Patois	11
All others (94 languages)	277
TOTAL	3,726

*bilingual staff members speaking more than one language are counted twice.

4) Video Interpretation Services

In specific instances, DHS can provide video interpretation services for deaf/hard-of-hearing residents.

All of the DHS-run intake centers, including PATH (the intake center for families with children) the Adult Families Intake Center and the 30th Street Intake Center (for single men), are equipped with video technology, including cameras and dual monitors, to provide video interpretation services for deaf/hard-of-hearing clients. Using video technology, an interpreter can be arranged in only 20 minutes.

In 2018, ORIA will continue to work with staff from DHS Disability Affairs and intake center staff to increase the use of this technology by providing training and equipment support.

5) On-site Interpretation Services

In 2017, DHS used on-site sign language interpretation services more than 200 times.

In November 2017, DHS gained access to on-site interpretation services for spoken languages through a shared contract under DSS. These services are primarily intended for situations in which a client is unable to use the phone or when a conversation would be too difficult to have using the phone. The Agency expects that the usage of this contract will increase in 2018, but will always remain low.

6) Client Provided Interpretation Services

In some DHS situations, residents have the right to bring friends, family or confidants with them to DHS interviews/meetings. In these instances, residents may choose to allow their family or friends to provide interpretation services on their behalf, if the suggested interpreter is over the age of eighteen. In all instances, if a resident suggests using a friend or family member as an interpreter, Agency staff reiterate that free and confidential language services are available, but will ultimately allow the resident to make the decision as to how he/she wishes to communicate.

b. Over-the-Phone Interactions

The majority of the over-the-phone interactions between DHS residents and staff occur at the Ombudsman Unit, where residents can file complaints and/or make adjustments to their case. In 2017, this unit transferred to the Office of Constituent Services within the Department of Social Services. Together, the units that make up the Office of Constituent Services received more than 4 million calls in 2017.

All DHS and DSS staff who answer or make phone calls have access to telephonic interpretation services in more than 200 languages.

c. Field and/or Home Visits

There are two primary instances in which DHS staff meet residents in the field. One is to try to arrange for residents to return to a previous living situation. The other is to attend housing interviews or view a potential new apartment with a resident.

When staff meet residents or landlords in the field, they have access to the same language tools as staff working in DHS locations: the Language Card to identify the individual's preferred language and access to telephonic interpretation services.

d. Hearings

There are a variety of circumstances under which DHS residents have the right to a Fair Hearing in a New York State Administrative Court. DHS is a party to those proceedings, but is not responsible for providing language services.

The only situation in which DHS hosts hearings is when a family shelter requests that a resident be involuntarily transferred out of a State-regulated shelter. In that circumstance, the resident is presented a written discharge form that explains the reason for the discharge and allows the resident to request a pre-discharge hearing. This discharge form is currently available in English and Spanish, but will be available in all 11 city-wide designated translation languages by July 1, 2018. A part of the hearing request that is included in the discharge form asks if the resident would like language services to be provided at the hearing. Even if the resident does not answer the language services question, the shelter will give the DHS hearing staff information on the resident's preferred language so that interpretation services can be arranged.

If a resident requests language services at a pre-discharge hearing, or if DHS attorneys or shelter staff believe that the client needs language services, then those services can be provided one of three ways: staff can use telephonic interpretation services, bilingual staff can use their own language skills, or residents can use their own interpretation services. For information on how the Agency provides each of these services, please see sections IV.a.2, IV.a.3 and IV.a.5 of this report.

e. Public Events (forums, town halls, etc.)

DHS participates in two types of public events: public hearings and community events.

If required by law, DHS will hold public hearings before implementing or changing certain program rules. Notifications for these hearings will be made according to the legal requirements of that specific program. As a part of the notification, individuals will be informed that they can contact the Agency to request interpretation services at the hearing. Even if not requested, DHS will provide on-site, simultaneous interpretation services at every public hearing. When individuals sign-in to attend the hearing, they will be asked if they would like to use these language services.

Agency leaders and outreach staff are also periodically asked to attend/present at public forums and events. In these instances, the need for interpretation services is usually determined by the group or community-based organization that is hosting the event. When asked, DSS has assisted other City agencies and community-based organizations with on-site interpretation services.

f. Public Notices and Mailings

In 2017, DSS established an Agency-wide translation policy that requires that all Agency-developed materials which will be distributed to or seen by clients (including notices, forms and informational materials) be translated into Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

In December 2017, the DSS General Counsel created a work group to bring DHS into compliance with Local Law 30 and the DSS translation policy. The work group includes members from ORIA, DHS program leaders, staff from the DSS Office of Policy, Procedures and Training (OPPT), staff from Information Technology Services (ITS) and representatives from the Office of Legal Affairs. To date, the group has come up with a detailed work plan and will oversee this complex and challenging process. Additionally, as part of DHS's integration with HRA, DSS now has centralized the production, tracking and revision of forms in an office that serves both agencies. This centralized process will facilitate DHS's effort to come into compliance with Local Law 30. For details on how the Agency will achieve compliance, please see section IX.b of this Plan.

g. Agency Web Site

As of December 2017, the DHS public web site, nyc.gov/dhs, provides users with a Google Translate option which allows readers to view most of the text on the site in a large number of languages.

The Office of Communications and Marketing (OCM), ORIA and DHS program areas are currently working together to create new multi-lingual text for the DHS web site that models the HRA site, nyc.gov/hra. Rather than providing the entire site in multiple languages, DHS program areas will summarize key information and provide professional translations of that summary in the eleven city-wide translation languages: Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian-Creole, Korean, Polish, Russian, Spanish and Urdu. The site is expected to include this multi-lingual text by Sept. 2018.

h. Emergency Preparedness and Response

DHS has updated its Emergency Preparedness Plan to ensure that LEP residents are able to access services during an emergency. This plan includes ensuring 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. In addition, DSS's Crisis and Disaster Unit and ORIA have worked closely with MOIA and the Office of

Emergency Management (OEM) to develop a plan to improve citywide coordination around LEP access to services during an emergency. The plan incorporates services for LEP populations as part of business continuity planning, such that language access will be available during and after an emergency.

V. Training

All DHS staff who work with clients, whether by phone, email or in-person, are mandated to receive training on working with limited English proficient (LEP) New Yorkers every year. The current version of the training, which takes an hour and half to deliver, was written by ORIA in 2017. It will be rewritten in 2018 in order to include updated material and ensure that the presentation is fresh and interesting.

DHS's LEP training includes an overview of the Agency's client population and a brief discussion of our legal obligations before going into detail on how to provide language services. The training gives staff step-by-step instructions on how to interact with LEP residents at intake locations, in shelter, over-the-phone and in the field. (This framework allows trainers to emphasize some forms of interaction and/or summarize others, depending on the roles of the staff being trained.) It includes information on when to speak with their designated Language Liaison and when to call ORIA for additional support. The training also includes specific information on working with sign language clients. Finally, the training ends with five challenging, real-world scenarios.

In 2018, DHS plans to use a train the trainer model to conduct LEP trainings. Staff leaders from each location will be trained by ORIA and then, in turn, they will train the other members of their team. DHS program areas will receive support from OPPT and ORIA in administering, tracking and conducting trainings.

VI. Record Keeping and Evaluation

The primary database used by DHS staff for tracking client needs and interactions is the Client Assistance and Rehousing Enterprise System (CARES).

Prior to 2017, CARES only recorded the language spoken by DHS case heads. In 2017, a field to record and track reading language was added.

One of ORIA's roles is to determine how LEP clients are being served by DHS. As of July 2017, ORIA is maintaining detailed records of the language services used by DHS staff. The team tracks:

- the number of calls to telephonic interpretation services by program, by vendor and by language;
- the number and nature of documents translated;
- sign language interpretation requests by program and method (video or on-site); and
- on-site interpretation requests by program and by language.

All of these requests are regularly compared to client data for each program to ensure that the number of service requests is appropriate for the client population.

In addition to carefully monitoring data and working closely with center-based staff, ORIA and other DSS outreach units meet with CBOs and community leaders to get a sense of whether appropriate services are being provided. DSS's Office of Constituent Services tracks any language access complaints received by the Agency, 311, nyc.gov and/or elected officials. ORIA reviews and responds to the complaints and takes appropriate follow-up actions with program areas.

VII. Outreach and Public Awareness of Language Access Services

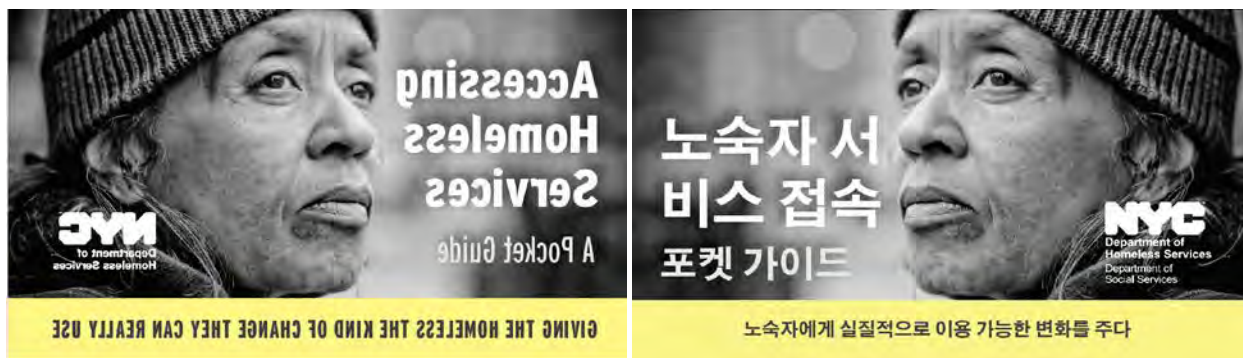
DHS engages in two types of outreach: outreach to homeless individuals to encourage them to transition into housing and outreach to partner organizations and individuals to give them information about the Agency's services. In addition to this outreach, residents are informed of their right to free language services by free interpretation posters and by staff.

Homeless Outreach

Operating the most comprehensive street outreach program in the nation, DHS deploys outreach teams 24 hours per day, seven days a week, 365 days a year, citywide, to canvass the five boroughs with the goal of engaging street homeless individuals and encouraging them to accept services and transition from the streets into housing.

Homeless outreach efforts become more urgent during periods of extreme hot or cold weather and homeless New Yorkers seeking shelter during inclement weather in New York City will not be turned away. Implementing its Code Blue and Code Red procedures respectively, DHS redoubles efforts to help unsheltered homeless New Yorkers indoors during extreme temperatures by doubling the number of outreach staff in the field, enabling teams to check on vulnerable individuals more frequently, making regular, repeated contact to protect safety and continue to offer services and support.

To the extent possible, all DHS outreach teams follow the same procedures for language access as other Agency staff members. Outreach staff all carry Language Cards (for details on this card, see section IV.a.1) to allow them to appropriately identify the language of the individual they are meeting and offer every potential resident free language services. Outreach staff use mobile phones to contact telephonic interpretation services from anywhere in the city. In addition, these staff carry pocket guides that list the various intake centers in 12 languages: Arabic, Bengali, Simplified and Traditional Chinese, English, French, Haitian-Creole, Korean, Polish, Russian, Spanish and Urdu.



(The text appears backwards because of the way the document is designed to fold.)

Outreach to Partner Organizations

In addition to outreach to currently homeless populations, DHS informs CBO partners of the availability of language services through community outreach. ORIA has conducted outreach to immigrant-serving community-based organizations and has given presentations on how LEP residents can access services.

Since 2016, ORIA has been working closely with a group of language access legal advocates in a Language Access Work Group. This group, and the Agency/community interaction that it generates, is expected to continue into the future.

Free Interpretation Services Poster

In 2016, HRA updated its “If you need an interpreter” poster to make it applicable to both HRA and DHS locations. The poster reads “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.” This statement is translated into Albanian, Arabic, Bengali, Simplified Chinese, Traditional Chinese, French, Greek, Haitian Creole, Hebrew, Hindi, Italian, Korean, Polish, Punjabi, Russian, Spanish, Urdu, Vietnamese, and Yiddish. The new, improved poster also indicates the availability of sign language interpretation services. These posters are prominently displayed in all DHS intake centers and direct-run shelters.

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 an HRA worker or call 311. Filing a complaint will not affect your case.*

ARABIC ▶ لديك الحق في الحصول على خدمات الترجمة الفورية المجانية في هذا الموقع. إذا كنت بحاجة إلى مترجم فوري، يُرجى الذهاب إلى مكتب الاستقبال وستقوم بالاتصال بشخص يقوم بالترجمة الفورية لك. إذا كان لديك سؤال أو تعليق أو شكوى بشأن الترجمة أو الترجمة الفورية في هذا الموقع، يُرجى التحدث إلى موظف إدارة الموارد البشرية أو الاتصال بالرقم 311. إن التقدم بشكوى لن يؤثر على حالتك.

ALBANIAN ▶ Në këtë vend gëzoni të drejtën e shërbimeve të interpretimit falas. Nëse ju duhet një interpretues, ju lutemi t'i drejtoheni receptionit dhe ne do të caktojmë dikë që të interpretojë për ju. Nëse keni pyetje, komente apo ankesa në lidhje me përkthimin ose interpretimin në këtë vend, ju lutemi flisni me një punonjës të Administratës së Burimeve Njerëzore (HRA) ose telefononi në numrin 311. Dorëzimi i ankesës nuk do të ndikojë në çështjen tuaj.

BENGALI ▶ এই জায়গায় আপনি মিনহরচায় ইন্টারপ্রিটারের পরিষেবা পেতে পারবেন। আপনার কোনো ইন্টারপ্রিটারের প্রয়োজন হলে, অনুগ্রহ করে রিসেপশন ডেস্কে গিয়ে জানান এবং আমরা আপনার জন্য ইন্টারপ্রিটার অনিয়মে দেব। এই জায়গায় অনুবাদ বা ইন্টারপ্রিটেশন নিয়ে আপনার কোনো প্রশ্ন, মতামত বা অভিযোগ থাকলে, অনুগ্রহ করে কোনো HRA কর্মীর সঙ্গে কথা বলুন বা 311 নম্বরে কল করুন। অভিযোগ জানাচ্ছে এমন কাহিনে আপনারকে কোনো অসুবিধায় পড়তে হবে না।

Staff

In addition to the free interpretation services poster, as discussed earlier, all residents are informed by staff at the beginning of every conversation that free language services are available.

Finally, beginning in May 2018, all residents will receive a notice in their application packet, in ten languages, that free language services are available. (For details on the form, see section IV.A.1.)

VIII. Language Access Complaints

DSS's Office of Constituent Services, which includes the Ombudsman Unit, tracks any language access complaints received by the Agency and the Shelter Repair Hotline. Calls are summarized by agents and emails uploaded directly into the Agency's Internet Quorum (IQ) program. Any complaints that include a language component are forwarded to the Ombudsman Unit or to the Ombudsman and a specific program area for resolution. If a complaint is limited to language services concerns, the Ombudsman 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 case issues are involved as well, the Ombudsman works with the appropriate program to ensure that both case issues and language access concerns are addressed.

Shelter complaints, including language complaints, received by 311 or nyc.gov are uploaded and tracked in Siebel, a customer service management program. These complaints are sent directly to DHS program areas for resolution.

DHS and DSS staff are working to combine these two procedures into a single, streamlined process by February of 2019, which will improve tracking, accountability and customer service.

IX. Implementation Plan Logistics

a. Language Access Coordinator

The Language Access Coordinator for the Department of Social Services, including the Department of Homeless Services, is Marah Rhoades, Deputy Commissioner, Office of Advocacy and Outreach.

b. Implementation Goals and Timeline

		Responsible Staff	Deadline
GOAL #1: Ensure all client notices and documents are in compliance with the Agency’s translation policy (available in 11 languages)			
Milestone 1	Create an inventory of all client notices/forms	DHS programs, ITS, OPPT	Feb. 2018
Milestone 2	Determine what systems/programs will be used to provide translated notices	ITS, DHS programs	April 2018
Milestone 3	Ensure that all involuntary discharge forms are available in 11 languages	OLA, ORIA	July 2019
Milestone 4	Review all notices to determine which should remain in circulation and prioritize translation	DHS programs	Sept. 2018
Milestone 5	Review all notices for plain language	OPPT and DHS programs	Dec. 2018
Milestone 6	Review all notices to reduce free-form text	ITS, DHS programs	Dec. 2018
Milestone 7	Create/update systems to allow the production of non-English forms and drop-in text	ITS	March 2019
Milestone 8	Translate all forms into 11 languages	ORIA, OPPT	March 2019
Milestone 9	Program new, translated forms into new distribution systems	ITS	July 2019

GOAL #2: Use the power of shared DSS services to improve client service			
Milestone 1	Provide additional information on nyc.gov/dhs in all 11 citywide designated translation languages	OCM, ORIA, DHS programs	Sept. 2018
Milestone 2	Ensure that all application packets include a notice of free interpretation services	HPA, OPPT, ORIA	July 2018
Milestone 3	Combine 311 and Shelter Repair Hotline complaint tracking procedures	OCC, DHS programs	Feb. 2019
GOAL #3: Increase the use of newly available communications tools			
Milestone 1	Increase the use of on-site interpretation services to ensure that the language needs of the most vulnerable residents are met	ORIA, DHS programs	Sept. 2018
Milestone 2	Increase the use of video to provide sign language interpretation services and reduce client wait times	ORIA, Disability Affairs, DHS programs	Dec. 2018
GOAL #4: Ensure the continuity of services over multiple platforms			
Milestone 1	Review the use of telephonic interpretation services by DHS shelter vendors	ORIA, DHS programs	Dec. 2018
Milestone 2	Make a determination on the best way to provide language services to residents living in vendor-run shelters	ORIA, DHS programs	July 2019
GOAL #5: Maintain compliance with Executive Order 120 by providing all front-line staff with LEP training			
Milestone 1	Rewrite LEP training for 2018	ORIA	Jan. 2018
Milestone 2	Train all front-line staff	DHS programs, OPPT, ORIA	Dec. 2018

GOAL #6: Improve customer service by improving service tracking mechanisms			
Milestone 1	Correct CARES database to use distinct lists for spoken and written languages	ITS	Feb. 2018
Milestone 2	Review language data available in CARES to ensure that volume of interpretation services provided is appropriate and proportional	ORIA	Jan. 2019

c. Implementation Plan Updates

This implementation plan will be updated at least once every three years and the updates posted on dhs.gov, as required by Local Law 30. Intermediary plans will be created and posted more frequently if deemed necessary by DSS’s Language Access Coordinator and Agency leadership.

2018 Language Access Implementation Plan: The Human Resources Administration (HRA)

- I. Agency Mission and Background**
 - a. Language Access Coordinator
 - b. Programs and Services Offered

- II. Agency Language Access Policy and Goals**
 - a. HRA's Policies around Language Access
 - b. Goals of HRA's Language Access Implementation Plan

- III. LEP Population Assessment**
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 - a. In-person Interactions
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 - iii. Telephonic Interpretation Services
 - iv. Bilingual Staff
 - v. Video Interpretation Services
 - vi. On-Site Interpretation Services (in HRA offices)
 - vii. Client Provided Interpretation Services
 - b. Over-the Phone Interactions
 - c. Field and/or Home Visits
 - d. Hearings
 - e. Public Events (forums, town halls, etc.)
 - f. Public Notices and Mailings
 - g. Agency Website/Mobile Applications
 - h. Emergency Preparedness and Response

- V. Training**

- VI. Record Keeping and Evaluation**

- VII. Outreach and Public Awareness of Language Access Services**

- VIII. Language Access Complaints**

- IX. Implementation Plan Logistics**
 - a. Implementation Goals and Timeline
 - b. Implementation Plan Updates

I. Agency Mission and Background

a. Language Access Coordinator

The Language Access Coordinator for the Department of Social Services, including the Human Resources Administration, is Marah Rhoades, Deputy Commissioner, Office of Advocacy and Outreach.

b. Programs and Services Offered

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, 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. Almost 650,000 of the New York City residents that HRA served in 2016 were limited English proficient (LEP). In 2017, the administrative units of the NYC Human Resources Administration (HRA) and the 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 better work for more New Yorkers in need. This includes sharing resources for providing free and confidential language services, managed by the Office of Refugee and Immigrant Affairs (ORIA).

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 do not qualify for cash assistance services due to immigration status or other factors may apply 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 do not qualify for SNAP benefits may be able to apply for and receive services 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 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. 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 physically and/or mentally impaired adults 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.

Investigation, Revenue and Enforcement Administration

The integrity of HRA programs is maintained by the Investigation, Revenue and Enforcement Administration (IREA). IREA confirms eligibility for first time applicants and active public assistance clients, conducts investigations of individuals and organized groups, and deters Cash Assistance 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](#).

II. Agency Language Access Policy and Goals

a. HRA's policies around language access

In our city of immigrants, HRA and DSS are committed to providing equal access for all New Yorkers, regardless of immigration status or language preference.

One-third of HRA's clients are limited English proficient (LEP). Collectively, our clients speak more than 90 languages. Over the years, we have provided language services by using our bilingual staff; increasing the use of our telephone interpretation service; providing translated documents and, when the need arises, using our in-person, video and sign language interpretation contracts.

While each HRA program has its own language access policy that is tailored to the client services provided, all of the Agency's language access procedures and policies reflect the same core principles:

1. All Agency employees are required to work with clients in the language of the client's¹ 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 will be seen by clients must be available in the following eleven languages in addition to English: Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

b. Overall goals of HRA's Language Access Implementation Plan

HRA serves a uniquely diverse population. In keeping with the Agency's commitment to providing benefits and services to all eligible applicants, this plan ensures that language will not be an obstacle to receiving services. The goal of this plan is to ensure that all eligible applicants and recipients receive the appropriate benefits without undue delay or difficulty. The application for benefits should take no longer for LEP clients than it does for English proficient clients. All of the support services the Agency provides should be available to all clients, regardless of language.

The goal of this Language Access Implementation Plan is to inform HRA clients, the Mayor's Office of Immigrant Affairs (MOIA) and the New York City Council about the language services that HRA provides and how they are provided.

¹ Throughout this plan, the expression "client" is used to refer to clients, applicants, consumers or members of the public.

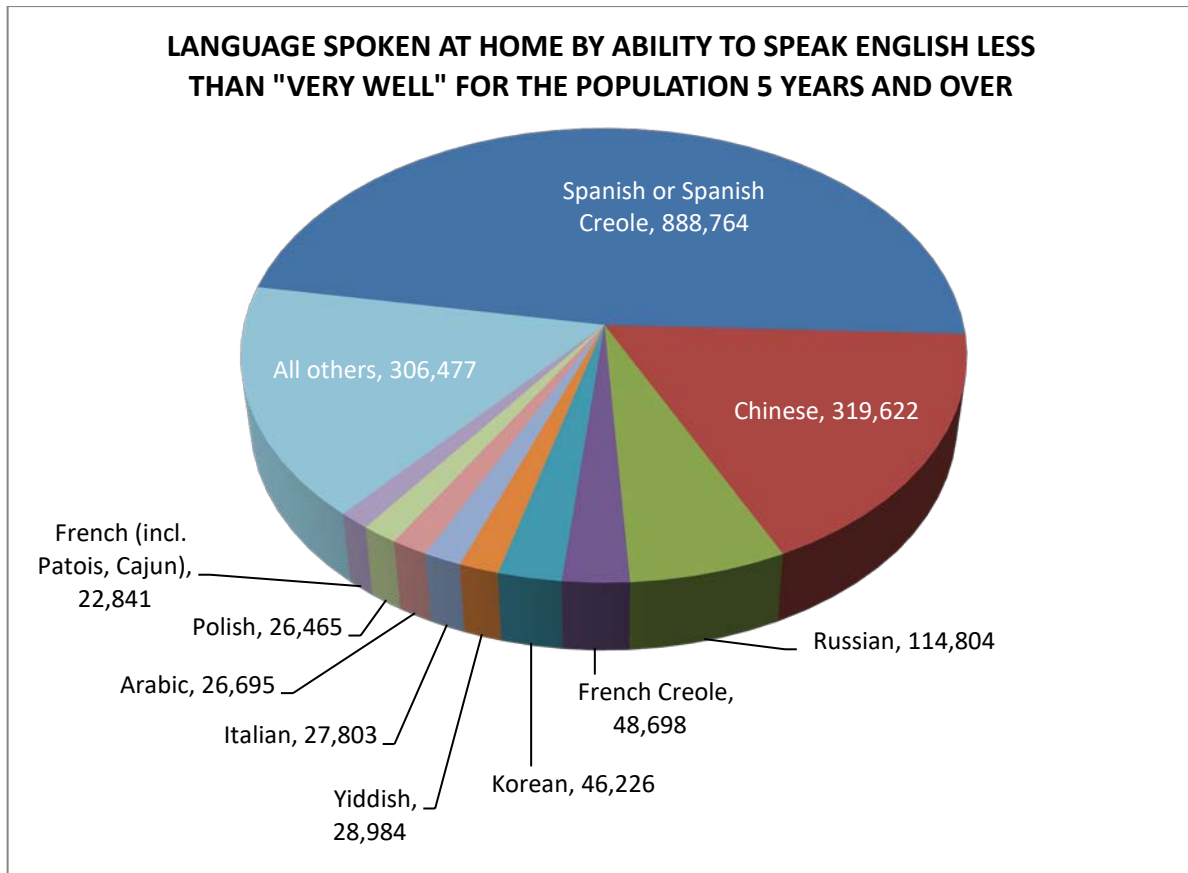
III. LEP Population Assessment

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

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

According to the U.S. Census Bureau², New York City residents who speak English less than “very well” are most likely to speak: Spanish, Chinese, Russian, French Creole, Korean, or Yiddish (see Figure 1).

Figure 1

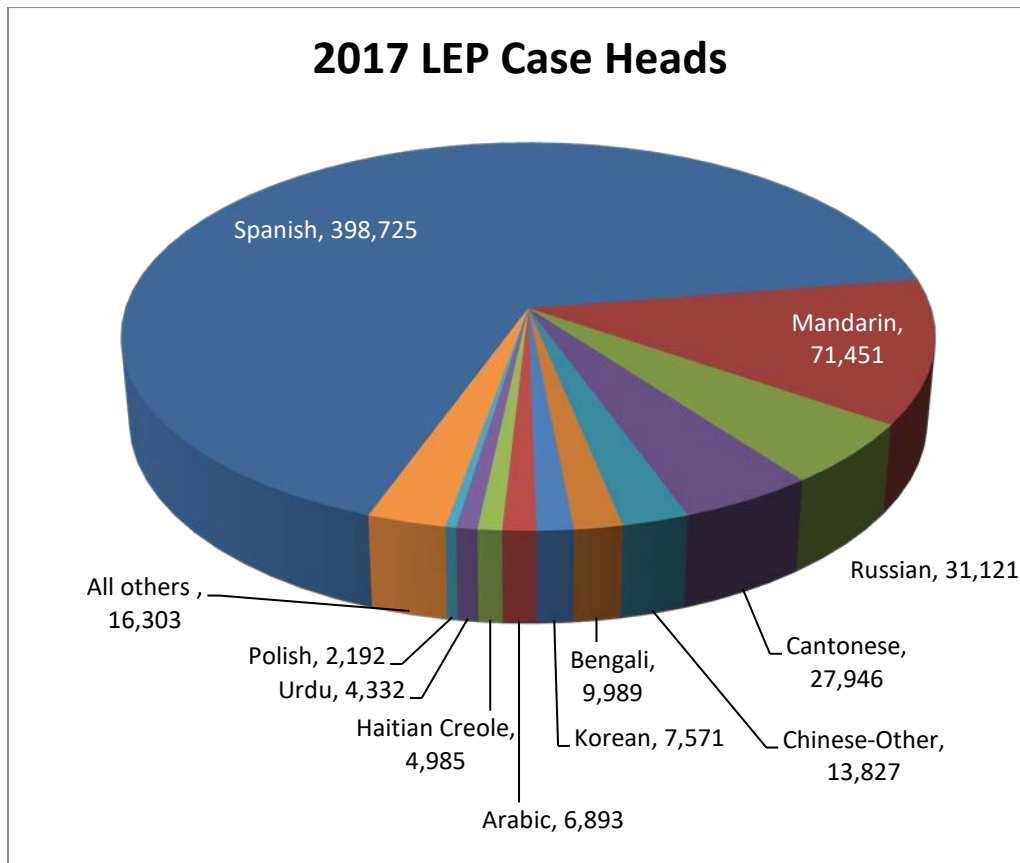


² 2011-2015 5-Year American Community Survey

Factor 2 is an analysis of the frequency with which LEP individuals come in contact with the program.

In 2017, HRA served 1.9 million unique cases. One-third (32%) of HRA's client population is limited English proficient. The top nine non-English languages spoken by HRA clients are: Spanish, Chinese dialects, including Mandarin, Cantonese and other, Russian, Bengali, Korean, Arabic, Haitian Creole, Urdu and Polish [see Figure 2].

Figure 2



HRA 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, HRA staff is expected to communicate with every client in his or her language of preference.

The Agency also provides written documents in the eleven³ city-wide languages mandated by Local Law 30 (Arabic, Bengali, Simplified and Traditional 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.

HRA 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 HRA's offices, language must not be a barrier to the receipt of appropriate services. This plan reflects HRA'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 and clients have equal access to the services for which they are eligible, regardless of the level of their English proficiency;
- To inform all HRA applicants and clients 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.

HRA uses bilingual staff, telephonic interpretation and, when appropriate, video or on-site interpretation to speak with clients in their preferred language.

In 2017, HRA provided written notices and documentation in their preferred language to clients who read Arabic, Bengali, Simplified or Traditional Chinese, Haitian Creole, Korean, Russian, Spanish or Urdu. By July 2019, all HRA produced documents will also be available in French and Polish. As per Agency policy, when a client notifies the Agency, either in-person or by calling Infoline, that they do not understand, for any reason, a document that has been sent to them, it is the staff member's responsibility to read and/or summarize the notice for them in a language that they understand.

HRA 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 Department of Citywide Administrative Services (DCAS).

³ HRA recognizes that Local Law 30 lists ten designated city-wide languages, but the law does not designate which form of Chinese characters should be provided. Given the size of HRA's Chinese language population, the Agency has opted to provide all notices in both styles of characters, implementing the Local Law 30 mandate as eleven languages rather than ten.

Type of Service	Vendor	2017 Instances	2017 Expenditures
Telephonic Interpretation	Voiance Language, LLC.	279,389	\$1,895,715
On-Site Interpretation (excluding sign language)	Geneva Worldwide, Inc.	3,235	\$216,627
Sign Language Interpretation (video and in-person)	Accurate Communication, Inc.	599	\$87,150
Written Translation	Language Line Solutions, Inc.	2,903	\$1,448,438
Bilingual Skills Testing	LM Language Services	11	\$1,284
Total Costs			\$3,649,214

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

HRA fully understands that effective communication in any language is essential for clients in accessing our crucial services and programs. The Agency is firmly committed 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.

HRA provides telephonic interpretation services in more than 200 languages, which covers more than 99% of Agency clients. Given that the eleven city-wide 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.

IV. Provision of Language Access Services

a. In-Person Interactions

All HRA staff are required to work with every client in his or her preferred language. To do this, staff must first correctly identify a client's language. In some locations, clients use a self-service check-in process to self-identify their language of preference. In other locations, staff use a combination of tools to correctly identify a client's language.

Once a client's preferred language is identified, there are five ways for staff to meet the preferred language mandate: they can use their own bilingual skills, telephonic interpretation services, video interpretation services, on-site interpretation services or the client can provide his or her own interpreter, as long as the individual is over the age of eighteen.

1) Using a Kiosk to Self-Identify Language Needs

At some Job and SNAP centers, clients use self-service check-in kiosks to identify their reason for being in the center and get an automatically generated ticket number. The first screen on the kiosk asks clients to self-identify their language of preference. The current options are English, Spanish, Arabic, Korean, Chinese (Traditional), Russian or Haitian Creole. Once a client has selected an option, the entire check-in process is conducted in that language.



The self-service check-in kiosks will be updated to reflect all eleven city-wide designated languages by December of 2018.

Once the check-in process is complete, all clients are given a ticket which tells them which floor/area to report to and provides a ticket number. Every ticket also includes the message "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." This message is printed on the ticket in English, Spanish, Traditional and Simplified Chinese, Russian, Bengali,

Korean, Arabic, Urdu and Haitian Creole. This message will also be translated into French and Polish by December of 2018.

Importantly, each ticket also identifies the client’s language. This not only allows the client to check his/her language option, but also informs staff who will later interact with the client. For new clients the recorded language is the language in which they used the kiosk. For clients who are previously known to the Agency, the language recorded on the ticket is the client’s language of record.

MELROSE SNAP CENTER
TUESDAY, JULY 11, 2016 11:39:30 AM
FLOOR: 3
NON-CASH ASSISTANCE AREA

Recertification Appointment Date: 7/11/2016

RB 2001

NCA RECERT PC BANK LANGUAGE SPOKEN: ENGLISH

Recertification End Date: 7/11/2016

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 solicitud. Tiene derecho a servicios gratuitos en otros idiomas. Si tiene alguna queja, solicite hablar con un supervisor o llame al 311.

每個人都受歡迎，每個人都有申請 HRA 福利的權利。無須社會安全號碼即可申請。您有權享受免費口譯服務。若您要投訴，請要求與主管談話或致電 311。

In addition to this ticket, clients who completed the check-in process in a language other than English receive a copy of the Agency’s notice of free interpretation services. This notice reads “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. In a Center, 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.” This message is printed in English, Spanish, Traditional Chinese, Russian, Korean, Arabic and Haitian Creole. By July of 2018, this notice will include Bengali, Simplified Chinese, French, Polish and Urdu.

NYC Human Resources Administration
Department of Social Services

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. In a Center, 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, hágase saber a un empleado. Si está en un Centro, simplemente muéstrele a un empleado 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。在中心裡，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 предоставляем вам бесплатные услуги устного перевода. Сообщите сотруднику, если вы хотите общаться с нами не на английском, а на другом языке или на языке жестов. В центре вы можете просто предъявить сотруднику карту "I Speak", представленную ниже. С вопросами, отзывами и жалобами в отношении предоставленных услуг устного перевода звоните по номеру 311. Подана жалоба не повлияет на рассмотрение вашего дела.

무료 통역 서비스를 받을 권리가 있습니다

당국은 무료 통역 서비스를 제공해 드립니다. 영어 이외의 언어 또는 수화로 상담하시려는 경우 직원에게 말씀하시기 바랍니다. 원티게 방문하시는 경우 아래에 있는 "I Speak" 카드를 직원에게 보여주시면 됩니다. 제공되는 통역 서비스와 관련된 문의사항, 의견 또는 불만사항이 있는 경우 311 번호로 전화해 주십시오. 불만 제기는 귀하의 케이스에 영향을 주지 않습니다.

لديك الحق في الحصول على خدمات الترجمة الفورية المجانية

ترجّد لدينا خدمات ترجمة فورية مجانية متاحة لكم من فضلك أخبر أحد الموظفين إذا رغبت متحدث معنا بلغة أخرى غير اللغة الإنجليزية، أو في لغة الإشارة في المركز، تملّصك أن تثير البطاقة المسمى "I Speak" الموجودة أدناه إلى أحد الموظفين. إذا كان لديك سؤال أو تعليق بشأن خدمات الترجمة الفورية المتكاملة، يرجى الاتصال بالرقم 311. لن يؤثر تقديم شكوى على حاسوبك.

Ou Gen yon Dwa pou Resevwa Sèvis Entèpretasyon Gratis

Nou gen sèvis entèpretasyon gratis ki disponib. Tanpri fe yon anplwaye konnen si ou vle pale avek nou nan yon lang ki pa Angle oswa nan yon lang sij. Nan yon Sant, ou kapab senpleman montre yon anplwaye kat "I Speak" (Mwen Pale) ki anba la a. Si ou gen yon kesyon, yon kòmantè oswa yon plent sou sèvis entèpretasyon nou bay yo, tanpri rele 311. Si ou fe yon plent sa p ap gen konsekans sou dosye ou.

I speak ...

Attention Agency employees: Please call an interpreter. This customer requires language assistance. See reverse side for language.

- Arabic / أحتاج إلى خدمات ترجمة فورية مجانية
- Haitian Creole / Mwen bezwen sèvis entèpretasyon gratis
- Korean / 무료 통역 서비스 제공해 주십시오
- Chinese / 我想用中文沟通
- Russian / Мне нужны бесплатные услуги перевода
- Spanish / Necesito servicios de interpretación gratis.
- Other / _____

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For clients who do not read or speak any of the above languages or who cannot use the self-service kiosk for any reason, a staff member is always available to assist. Staff members have access to telephonic interpretation or other accessibility tools to help clients with the check-in process.

2) Staff Tools for Identifying a Client’s Language of Preference

All direct interactions between HRA staff and clients begin with an offer of free language services. If a client accepts the offer of language services, the second step is to identify the client’s language of preference. Many HRA clients self-identify their preferred language. Others are identified by the Agency’s diverse bilingual staff. In addition, staff in our offices can use the Language Card, the free interpretation services notice or our telephonic interpretation services vendor to identify a client’s preferred language.

The Language Card

The Language Card is a folded card that contains the phrase: “Do you speak [name of the language]? Please be seated. I will call an interpreter for you.” This phrase appears in the following languages: English, Albanian, Arabic, Bengali, Bosnian, Cantonese (traditional characters), Mandarin (traditional characters), Haitian Creole, French, Greek, Hebrew, Hindi, Italian, Khmer, Korean, Polish, Russian, Spanish, Ukrainian, Urdu, Vietnamese, and Yiddish. It also includes the symbol for deaf/hard-of-hearing services. As of 2016, the card is available in two sizes, 11”x17” and 5”x7”.

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."	Hindi	क्या आप हिन्दी बोलते हैं?	कृपया बैठ जाइए। मैं आपके लिए दुभाषिये की व्यवस्था करूंगा/ करूंगी।
Albanian	Flisni shqip?	Uluni ju lutem. Po shkoj të thërras një përkthyes për ju.	Italian	Parla italiano?	Prego, si accomodi e attenda mentre Le chiamo un interprete.

Notice of Free Language Interpretation

As mandated by Local Law 73, all HRA programs include an 8.5"x 11" notice of free interpretation services in their application and re-certification packets. As discussed above, by July of 2018, this notice will be in Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.

Use of Telephonic Interpretation Services to Identify a Client's Preferred Language

If clients do not identify their preferred language on the Language Card or the Notice of Free Interpretation Services, it may be because the client speaks another language or does not read in any language. At that point, staff can call telephonic interpretation services and ask for a Client Services Representative. The representative can work with the staff member to identify the client's language using various linguists.

3) Telephonic Interpretation Services

Most frequently, staff use telephonic interpretation services to communicate with clients who prefer to use a language other than English. In 2016, HRA provided 218,812 instances of telephonic interpretation services. That is an average of 842 calls per business day and an increase of 27% over 2015. In 2017, HRA averaged more than 1,000 telephonic interpretation calls per day.

ORIA confirms the quality of the Agency's telephonic interpretation services (which are available in more than 180 languages) by tracking complaints and meeting regularly with staff and outside advocates. Complaints about interpreters or interpretation services are forwarded to our professional services vendor, who, when a specific call can be identified, has management staff listen to and review the call and take appropriate action. When complaints are more general, the vendor can create detailed reports of wait times, the number of calls and the number of interpreters available during a specific period.

4) Bilingual Staff

DSS (which includes both HRA and DHS) employs more than 2,100 individuals who speak a language other than English. Collectively, our staff speaks 128 languages.

DSS's Bilingual Staff (as of 5/15/2017)

Language	Number of bilingual staff*
Spanish	1,303
Russian	406
Yoruba	211
French	203
Haitian Creole	197
Cantonese	137
Mandarin	123
Bengali	112
Hindi	101
Ukrainian	85
Urdu	58
Igbo	49
Arabic	44
Ibo	35
Malayalam	33
Nigerian Pidgin English	30
Punjabi	30
Hebrew	27
Polish	25
Italian	24
Tagalog	24
Toishanese	20
German	19
Portuguese	19
Gujarati	18
Vietnamese	16
Edo	15
Korean	15
Greek	12
Pidgin English	12
Tamil	12
Yiddish	12
American Sign Language (ASL)	11
Patois	11
All others (94 languages)	277
TOTAL	3,726

*bilingual staff members speaking more than one language are counted twice.

5) Video Interpretation Services

In specific instances, HRA can provide video interpretation services for both deaf/hard-of-hearing clients or for limited English proficient clients.

All Family Independence Administration (FIA) SNAP and Job Centers are equipped with video technology, including cameras and dual monitors, to provide video interpretation services for deaf/hard-of-hearing clients. Without this technology, deaf/hard-of-hearing clients would have to either pre-schedule appointments or wait two hours for an on-site sign language interpreter to arrive. Using video technology, an interpreter can be arranged in only 20 minutes.

Video interpretation services for sign language services will be expanded to all Office of Child Support Services (OCSS) locations by September of 2018.

HRA is also continuing a pilot to use video technology to provide interpretation services for limited English proficient New Yorkers. This pilot is available at SNAP and Job Centers in Queens and uses tablets to connect with interpretation services. Staff from multiple program areas continue to work together to determine the best service model based on the pilot experience.

6) On-site Interpretation Services (in HRA offices)

HRA uses on-site interpretation for sign language interpretation services whenever it is requested by a client or if a specific location does not have access to video services. The Agency is also able to provide on-site interpretation services for limited English proficient clients in our offices if telephonic interpretation services are not available or practical. The two most common reasons for using on-site interpretation services for limited English speaking clients would be because a client does not hear well enough to use the phone (most commonly because of age related hearing loss) or if a particularly rare language is more readily available through our on-site interpretation services vendor than our telephonic interpretation services vendor.

7) Client Provided Interpretation Services

In most programs, clients have the right to bring friends, family or confidants with them to HRA interviews/meetings. (Notable exceptions to this rule are interviews with the Office of Domestic Violence, Adult Protective Services and the Bureau of Fraud Investigation.) In these instances, clients may choose to allow their family or friends to provide interpretation services on their behalf, if the suggested interpreter is over the age of eighteen. In all instances, if a client suggests using a friend or family member as an interpreter, Agency staff reiterate that free and confidential language services are available, but will ultimately allow the client to make the decision as to how he/she wishes to communicate.

b. Over-the-Phone Interactions

HRA has approximately 30 public-facing phone numbers, but the vast majority of callers contact the Agency through two numbers – Infoline (the Agency’s call center) and the SNAP Telephone Interview Processing (TIPS) line, which handles scheduled SNAP application interviews and On-Demand SNAP recertification interviews.

Infoline receives more than 4 million calls per year. The initial Interactive Voice Response System (IVRS) allows callers to continue in Spanish, Mandarin, Russian or Vietnamese. Callers who select these options will be automatically routed to a bilingual call agent, unless the wait time is significantly longer than in the general queue. (When the wait time for a bilingual call agent reaches a set length, calls are routed to the next available agent with the expectation that the agent will use telephonic interpretation services to speak with the caller.)

Clients who are recertifying for SNAP benefits can now call SNAP On-Demand, rather than waiting for the Agency to call them for a telephone interview. The On-Demand line has voice recognition in English and Spanish and touch-tone capability in Arabic, Bengali, Mandarin, Cantonese, Haitian Creole, Korean, Russian and Urdu. In addition, there is a static message informing callers to select a specific option and ask for an interpreter in Polish, Albanian, French, Urdu, Hindi, Vietnamese or Greek. Together, these 16 languages represent more than 99% of the Agency’s SNAP clients.

Call agents at all of the Agency’s public phone numbers, including both Infoline and the SNAP TIPS line, have access to telephonic interpretation services in more than 200 languages. If callers to any of these numbers are unable to identify their preferred language in English, agents can contact our telephonic interpretation services and speak with a Client Services Representative who is specifically trained to help identify the language of the caller.

c. Field and/or Home Visits

When clients are known to the Agency and already have a case record, staff can check the appropriate program database to determine the client’s language preference.

When applicants or members of the public are new to the Agency and, therefore, do not have a case record, staff may be able to check either the applicant’s request for a home visit or the referral to the Agency for a reference to the client’s language needs.

Once a staff member arrives in the field, the client may identify his/her primary language in English or the staff member may use the Language Card to identify the client’s language. If the client does not speak one of the 19 languages listed on the Language Card, or cannot point to the appropriate choice, field staff can work with our telephonic interpretation services vendor in the same manner as described above.

Once the language of the client has been determined, staff have the option of using telephonic interpretation services or requesting an on-site interpreter. In 2017, staff requested on-site interpretation for spoken languages 3,235 times or more than 60 times per week. The majority of these requests were for the Adult Protective Services program, but requests were also made by the Family Independence Administration, the HIV/AIDS Services Administration and the Medicaid Home Care program.

Staff can also request sign language interpretation services for home/field visits.

d. Hearings

HRA holds hearings in connection with its rental assistance programs. When clients receive the notification of a decision on their case, the form includes a request for a hearing. (The notification is currently available in nine languages. By July of 2018, it will be in the designated eleven languages.) If an individual requests a hearing, they are contacted by Agency staff, who have access to interpretation services, for scheduling purposes. During that call, clients are asked whether they would like interpretation services for their hearing. If clients request interpretation services, onsite interpreters are used.

If individuals do not request interpretation services in advance, hearing staff use the same free interpretation posters and tools as other Agency staff to determine the individual's primary language. If these tools do not contain enough languages or do not allow the client to identify their language, hearing staff also have access to telephonic interpretation services and can enlist the support of a Client Services Representative.

e. Public Events (forums, town halls, etc.)

HRA participates in two types of public events: public hearings and community events.

Where required by law, HRA holds public hearings before implementing or changing certain program rules. Notifications for these hearings are made according to the legal requirements of that specific program. As a part of the notification, individuals are informed that they can contact the Agency to request interpretation services at the hearing. Even if not requested, HRA provides on-site, simultaneous interpretation services at every public hearing. When individuals sign-in to attend the hearing, they are specifically asked if they would like to use these language services.

Agency leaders and outreach staff are periodically asked to attend/present at public forums and events. In these instances, the need for interpretation services is usually determined by the group or community-based organization that is hosting the event. When asked, HRA has assisted other City Agencies and community-based organizations with on-site interpretation services.

f. Public Notices and Mailings

For many years, HRA has been in full compliance with Local Law 73 of 2003, which requires the translation of agency-developed documents into six languages (Arabic, Chinese⁴, Haitian Creole, Korean, Russian, and Spanish).

In 2015, on its own volition, the Agency opted to move well beyond the requirements of LL73. Rather than translating agency-developed documents into six languages, the Agency began to translate all client-facing and public-facing documents into nine languages. (Bengali, Simplified Chinese, and Urdu were added.) The Agency established an expansive Agency-wide translation policy that requires that all Agency-developed materials which will be distributed to clients or the public (including notices, forms and informational materials) be translated into eleven languages: Arabic, Bengali, Simplified and Traditional Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu.

In 2017, the City Council passed Local Law 30, which requires the translation of certain documents into ten languages. At that time, the Agency already had its client-facing documents available in nine languages. Thus, French and Polish were added to the languages into which HRA forms were already being translated.⁵

Additionally, HRA conducted a review of all forms and notices that are distributed to the clients or the public to confirm that they comply with the plain language principles set forth in Local Law 30.

Because HRA serves such a large number of clients (more than 3 million annually), almost all Agency forms and notices are automatically generated by HRA systems. For example, automated systems search client records and automatically mail appropriate notices to clients who need to submit documentation, update their records, schedule an appointment, etc. When the Agency's primary automated systems were put in place, they were created to accommodate ten languages. In 2017 and 2018, the Agency invested resources to upgrade these systems to allow them to generate documents into more languages.

Now that the Agency's automated systems have been upgraded, the Agency has begun the labor-intensive process of programming documents into an additional two languages (Polish and French) pursuant to Local Law 30. Additionally, for any document that is revised or reworked for any reason,—for example, when plain language edits are made—the Agency must first have the new, updated form translated into all twelve languages and then separately have each translated version reprogrammed so it is available for automated generation. This was the case for many of the Agency's more than 1,600 forms. Currently, approximately 35% of forms and notices that are distributed to the public have been translated into all twelve languages and are available for automated generation.

By June of 2018, all of the Agency's documents will be translated into twelve languages. Many of those documents will be available to clients or the public immediately. Others, specifically those that need to be programmed in order to be mailed automatically, will be made available on a rolling schedule. The

⁴ HRA provided translation into Traditional Chinese characters.

⁵ In 2017, HRA provided service to 2,192 Polish- and 1,407 French-speaking households.

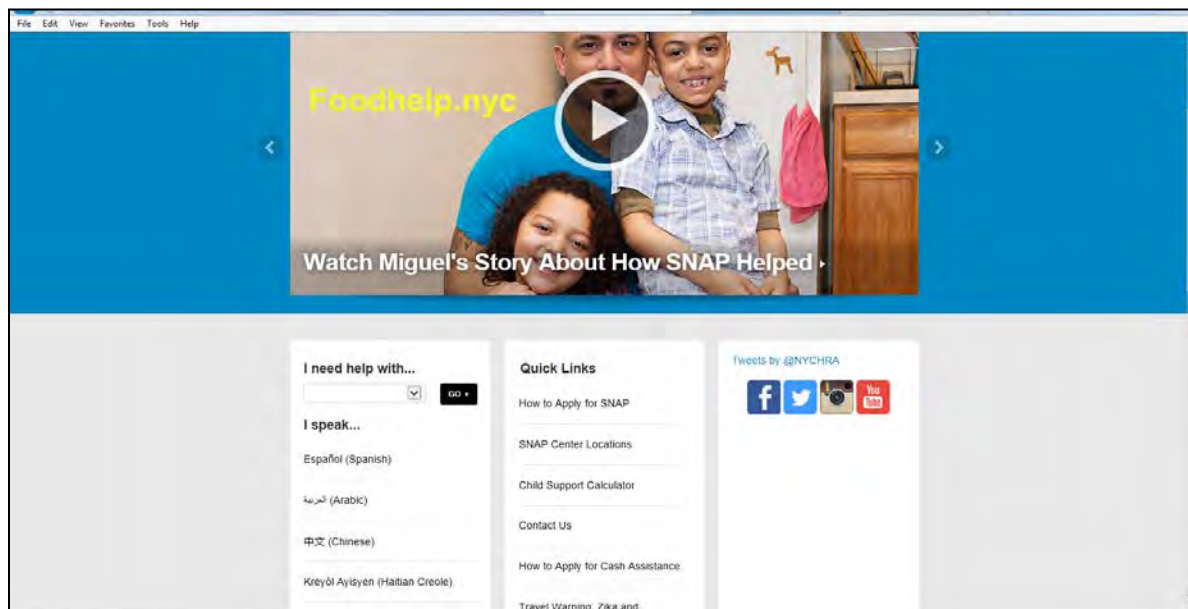
Agency expects that every document or notice which is seen by clients or the public will be mailed out and/or be available in twelve languages by July 2019.

HRA's Office of Policies, Procedures and Training (OPPT) will be responsible for tracking updated versions of forms and ensuring that the correct, up-to-date form, in the correct language is delivered to each client.

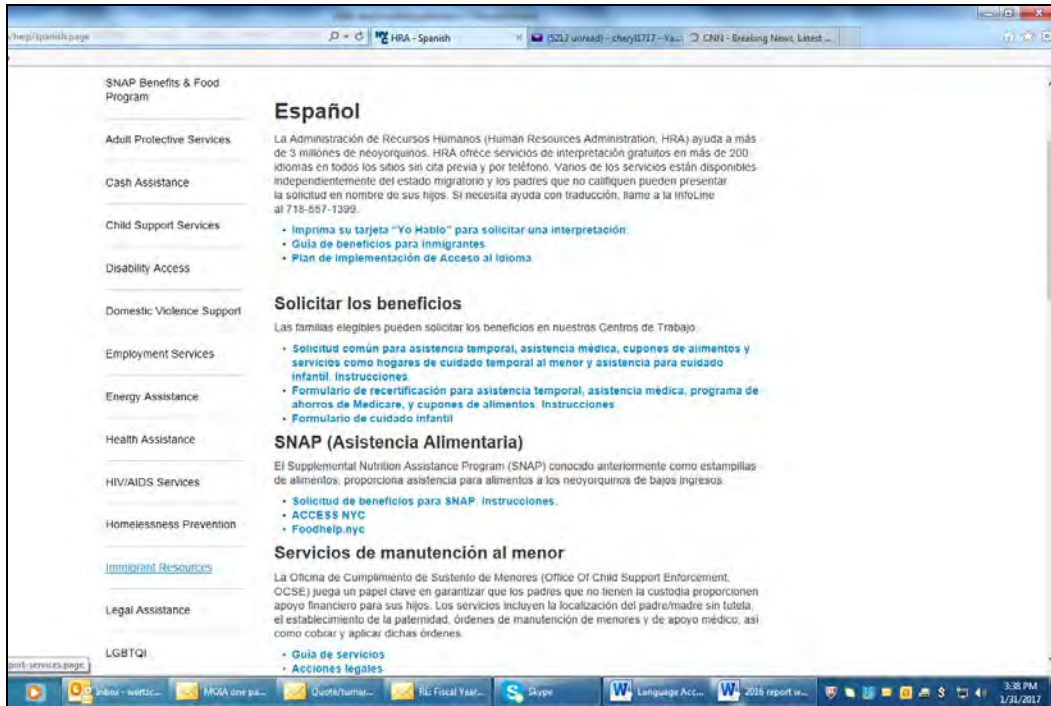
HRA's documents are all professionally translated by certified translators at Language Line Solutions. While Language Line conducts its own quality assurance check, HRA also seeks feedback from the public and stakeholders on the quality of our written translations. When needed, HRA relies on volunteers from the City's Language Bank to review translated documents.

g. Agency Web Site/Mobile Applications

HRA redesigned its public web site (www.nyc.gov/hra) in 2015. Directly under the "hero," HRA's home page divides into three columns. The first column begins "I speak..." and then lists Spanish, Arabic, Chinese (Traditional), Haitian Creole, Korean, and Russian in each of those languages.



Clicking on a language takes a reader to a page that has been entirely, professionally translated in that language. The translated page not only includes information about each of the Agency's programs, but also displays a large number of links to other relevant information, forms and notices. (Links are to documents in that language when they are available and to English documents when they are not.)



The Office of Refugee and Immigrant Affairs has confirmed that the information included on the Agency’s multi-lingual pages is up-to-date and complete. Once that process is complete, additional pages will be added in Bengali, Simplified Chinese, French, Polish and Urdu. By July 2018, the HRA’s public web site will have professionally translated text, as well as useful links, in all of the eleven city-designated translation languages.

HRA clients also interact with the Agency through the ACCESS HRA site and mobile application. Clients may be able to use the ACCESS HRA web site to re-certify for their SNAP and Cash Assistance benefits, apply for SNAP, submit a Periodic Report for SNAP, edit their case details (mailing address, phone number and email address), upload documents, view Agency notices, request a budget letter and much more. Importantly, clients can also use ACCESS HRA to change their language preference, which will automatically change the language in which they receive notices from the Agency.

The ACCESS HRA mobile app, which allows clients to use a smart phone to manage their case details, upload eligibility documents and receive notifications from the Agency, is available in Arabic, Traditional Chinese, French, Korean, Russian and Spanish. (The mobile application is in French instead of Haitian Creole because neither iPhone nor Android devices support Haitian Creole.)



In addition to the sites mentioned above, HRA clients with access to a smart phone can use the “HRA Document Upload” application to upload and submit requested eligibility documents to the Agency. Like the Access HRA mobile app, the Document Upload app is available in Arabic, Traditional Chinese, French, Korean, Russian and Spanish.



h. Emergency Preparedness and Response

HRA has updated its Emergency Preparedness Plan to ensure that LEP clients are able to access services during an emergency. This plan includes ensuring that documents are translated, appropriate multi-lingual signage and LEP identification tools are available at emergency sites, interpreters can be contacted, and staff are trained in the provision of language services. In addition, HRA's Crisis and Disaster Unit and ORIA have worked closely with MOIA and the Office of Emergency Management (OEM) to develop a plan to improve citywide coordination around LEP access to services during an emergency. The plan incorporates services for LEP populations as part of business continuity planning, such that language access will be available during and after an emergency.

V. Training

All HRA staff who work with clients, whether by phone, email or in-person, are mandated to receive training on working with limited English proficient (LEP) New Yorkers every year. The current version of the training was written by ORIA in 2016 and updated in 2017. It was rewritten in 2018 in order to include updated material and ensure that the presentation is fresh and interesting.

HRA's LEP training includes an overview of the Agency's client population and a brief discussion of our legal obligations before going into detail on how to provide language services. The training gives staff step-by-step instructions on how to interact with LEP clients in-person at the centers, over-the-phone and in the field. (This framework allows trainers to emphasize some forms of interaction and/or summarize others, depending on the roles of the staff being trained.) It includes information on when to speak with their designated language liaison and when to call ORIA for additional support. The training also includes specific information on working with sign language clients. Finally, the training ends with five challenging, real-world scenarios.

The training takes an hour and a half and is usually delivered by professional trainers with the Office of Policy, Procedure and Training. (In some instances, ORIA conducts trainings directly for program staff.) HRA no longer uses online tools for LEP training.

VI. Record Keeping and Evaluation

HRA tracks clients' preferred language for speaking and reading through a number of program-specific databases. The largest of these databases is the New York State Welfare Management System (WMS), which tracks client data for participants in the Cash Assistance, SNAP, Medicaid and HIV/AIDS Services Administration (HASA) programs. Other programs, including the Office of Child Support Services (OCSS), the Home Energy Assistance Program (HEAP), Adult Protective Services (APS) and the Investigation, Revenue and Enforcement Administration (IREA) track client language data in their own databases.

Client interactions in the Cash Assistance and SNAP programs are recorded in the Paperless Office System (POS). For specific types of client interactions, including new applications, re-certifications and certain types of case changes, POS records how language services were provided. Options include:

- the use of bilingual staff;
- the client brought his/her own interpreter;
- the use of telephonic interpretation services; and
- the use of on-site interpretation services.

One of ORIA's roles is to determine how LEP clients are being served by HRA. In addition to carefully monitoring client data and working closely with center-based staff, ORIA and other HRA outreach units meet with Community-Based Organizations (CBOs), immigrant clients and members of our External Language Access Working Group. HRA's Office of Constituent Services tracks any language access complaints received by the Agency, 311, nyc.gov and/or other elected officials. ORIA reviews and responds to the complaints and takes appropriate follow-up actions with program areas.

Finally, the Office of Quality Assurance asks clients to fill out a survey during audits in clients' homes, at HRA sites and on the phone. Bilingual staff and interpreters are used to conduct these surveys with LEP customers.

VII. Outreach and Public Awareness of Language Access Services

HRA informs the public of the availability of language services through posters in all of our walk-in centers, notices in applications and renewal packets and a notice on tickets in FIA walk-in centers. In addition, all staff are trained to offer free language services to every client at every interaction.

“Free Interpreter Services” poster

In 2016, HRA updated its “If you need an interpreter” poster to make it applicable to both HRA and DHS locations. The poster reads “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.” This statement is translated into Albanian, Arabic, Bengali, Simplified Chinese, Traditional Chinese, French, Greek, Haitian Creole, Hebrew, Hindi, Italian, Korean, Polish, Punjabi, Russian, Spanish, Urdu, Vietnamese, and Yiddish. The new, improved poster also indicates the availability of sign language interpretation services. These posters are prominently displayed in all of HRA’s walk-in locations.

**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 an HRA worker or call 311. Filing a complaint will not affect your case.*

ARABIC ▶ لديك الحق في الحصول على خدمات الترجمة الفورية المجانية في هذا الموقع. إذا كنت بحاجة إلى مترجم فوري، يرجى الذهاب إلى مكتب الاستقبال وستقوم بالاتصال بشخص يقوم بالترجمة الفورية لك. إذا كان لديك سؤال أو تعليق أو شكوى بشأن الترجمة أو الترجمة الفورية في هذا الموقع، يرجى التحدث إلى موظف بإدارة الموارد البشرية أو الاتصال بالرقم 311. إن التقدم بشكوى لن يؤثر على حالتك.

ALBANIAN ▶ Në këtë vend gëzoni të drejtën e shërbimeve të interpretimit falas. Nëse ju duhet një interpretues, ju lutemi t'i drejtoheni receptionit dhe ne do të caktojmë dikë që të interpretojë për ju. Nëse keni pyetje, komente apo ankesa në lidhje me përkthimin ose interpretimin në këtë vend, ju lutemi flisni me një punonjës të Administratës së Burimeve Njerëzore (HRA) ose telefononi në numrin 311. Dorëzimi i ankesës nuk do të ndikojë në çështjen tuaj.

BENGALI ▶ এই জায়গায় আপনি মিনহরমায় ইন্টারপ্রেটারের পরিষেবা পেতে পারবেন। আপনার কোনো ইন্টারপ্রেটারের প্রয়োজন হলে, অনুগ্রহ করে রিসেপশন ডেস্কে গিয়ে জানান এবং আমরা আপনার জন্য ইন্টারপ্রেটার আনিয়ে দেব। এই জায়গায় অনুবাদ বা ইন্টারপ্রেটশন নিয়ে আপনার কোনো প্রশ্ন, মন্তব্য বা অভিযোগ থাকলে, অনুগ্রহ করে কোনো HRA কর্মীব্বির সঙ্গে কথা বলুন বা 311 নম্বরে কল করুন। অভিযোগ জানাতে-এর কারণে আপনার কোনো অসুবিধার পড়তে হবে না।

In addition to the free interpretation services poster, all clients who receive a ticket/place in line in our offices, receive a notice, in ten languages, that free language services are available. (For details on the ticket, see section IV.A.1.)

All clients who are applying or recertifying for any benefits are also provided with a Notice of Free Interpretation Services in seven languages. (For details, please see section IV.A.1.)

Finally, HRA informs potential LEP customers of the availability of language services through community outreach and by distributing materials that provide information on HRA's language access. Over the years, ORIA has conducted outreach to immigrant-serving CBOs and has given presentations on how LEP customers can access services. Since 2016, ORIA has been working closely with a group of language access legal advocates in a Language Access Work Group. This group, and the Agency/community interaction that it generates, is expected to continue into the future.

VIII. Language Access Complaints

DSS's Office of Constituent Services tracks any language access complaints received by the Agency, 311, nyc.gov and/or elected officials. Calls are summarized by agents and emails uploaded directly into the Agency's 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 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 case issues are involved as well, ORIA works with the appropriate program to ensure that both case issues and language access concerns are addressed.

IX. Implementation Plan Logistics

a. Implementation Goals and Timeline

	GOAL #1: Ensure agency-created documents are translated in compliance with LL 30 and the Agency’s translation policy	Responsible Staff	Deadline
Milestone 1	Create a catalog of agency-created documents. Prioritize the list according to the legal requirements of LL30.	OPPT, ORIA, Programs	May. 2018
Milestone 2	Complete plain language review and editing of mandatory documents.	OPPT, Programs	June 2018
Milestone 3	Submit documents for translation.	OPPT, ORIA	June 2018
Milestone 4	Ensure that documents are translated into 11 languages. Static documents and those that are given to clients in a Center will be immediately available.	ORIA	July 2018
Milestone 5	Phase 1: Highest priority mailed documents (35% of total) programmed and deliverable to clients in 12 languages.	ITS, OPPT	July 2018
Milestone 6	Phase 2: Priority mailed documents (60% of total) programmed and deliverable to clients in 12 languages.	ITS, OPPT	Dec 2018
Milestone 7	Phase 3: All Agency forms deliverable to clients in 12 languages.	ITS, OPPT	June 2019
	GOAL #2: Ensure all application and recertification materials are LL30 compliant	Responsible Staff	Deadline
Milestone 1	Add additional languages to the Notice of Free Interpretation	ORIA, OCM	May 2018
Milestone 2	Make Agency produced client notices/forms in application/recertification packets available in 12 languages.	FIA, OPPT, ORIA	June 2018

	GOAL # 3: Expand the use of technology to provide high-quality client services	Responsible Staff	Deadline
Milestone 1	Add additional languages to Self-Service kiosks	ITS	Dec. 2018
Milestone 2	Add French and Polish to tickets	ITS	Dec. 2018
Milestone 3	Increase the number of tablets available for video interpretation services for LEP clients	ITS, FIA	April 2018
Milestone 4	Provide additional translations on HRA.gov	OCM, ORIA	June 2018
Milestone 5	Expand video sign language interpretation services to Office of Child Support locations	OCSS, ITS	Sept. 2018
	GOAL # 4: Maintain compliance with LL by providing LEP training to all front-line staff	Responsible Staff	Deadline
Milestone 1	Rewrite LEP training for 2018	ORIA	Completed Feb. 2018
Milestone 2	Train all front-line staff	OPPT	Dec. 2018

b. Implementation Plan Updates

This implementation plan will be updated at least once every three years and the updates posted on hra.gov, 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.

Name and title of Language Access Coordinator:

Eleanor DiPalma, Ph.D., Executive Director, Customer Service/Language Access

I. Agency Mission and Background

DOT's 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. Our agency's work is guided by Sustainable Streets, the Strategic Plan for the New York City Department of Transportation. We are 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 4,500 DOT employees oversee one of the most complex urban transportation networks in the world. DOT's staff manage an annual operating budget of \$900 million and a five-year \$6.3 billion capital program, 6,000 miles of streets and highways, over 12,000 miles of sidewalk, 789 bridge and tunnels. DOT's staff installs and maintains over one million street signs, 12,700 signalized intersections, over 315,000 street lights, and 69 million linear feet of markings.

DOT promotes the use of sustainable modes of transportation. DOT designs bicycle facilities, bus lanes, and public plazas. DOT operates the Staten Island Ferry, which serves over 22 million people annually and oversees ferry operations on City-owned piers. DOT educates students and adults Citywide about street safety. DOT'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.

DOT 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, DOT 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 DOT's efforts, conducted throughout the five boroughs by multiple DOT Divisions, Units and Offices to maintain, develop and promote numerous transportation initiatives, including but not limited to:

- Safe bicycling
- Wayfinding and safe pedestrian crossings
- Traffic calming and other safety improvements
- Alternative modes of transportation

DOT continues in its robust outreach efforts engaging LEP communities through the provision of agency language services in various communication channels, such as face to face in meetings, on-line through emails, social media and mixed mode surveys. DOT invites customer feedback and participation in agency campaigns and the development of various projects such as Vision Zero; DWI; Safety Education; Transit Development; Bridge Construction; Truck Traffic; Bike Share; Public Plazas; and Parking Regulations.

One of DOT's formation and implementation of the DOT Street Ambassador program is a recent innovative strategies that was instituted for the purpose of expanding agency outreach and ensuring public engagement in communities citywide. Customer driven in all their activities, DOT Street Ambassadors meet members of the public in their neighborhoods engaging New Yorkers in the planning and development of DOT projects aimed at safety, mobility, sustainability and quality of life. DOT 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. DOT's goal is to move the City closer toward an inclusive and just planning process. Since Street Ambassadors are strategically deployed to busy areas near project sites, they hear directly from the people. New Yorkers have opportunities to stop and chat about a project on their own time and in their own language.

DOT Customer Service/Language Access Unit (CSLA) provides a full-range of professional language services designed for all customers in a various scenarios: one-on-one customer communications; group settings; email and letter responses; fulfillment of customer literature requests; distribution of: Voter Registration forms in multiple languages; distribution of DOT translated materials as well as the installation and updates to translated DOT signage. As a supplement to agency language services in which certified interpreters and translators are provided, DOT utilizes DOT bilingual employees to provide language services on a volunteer basis. Bilingual employees provide interpretations in one-on one communications with LEPs and they also review brief translation projects prior to distribution.

DOT hosts special events to all members of the public where both interpretation and translation services are arranged in partnership with many agencies and community organizations, to name only a few: 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.

Other widespread points of customer contacts continue to occur at DOT's Public Service Centers located citywide where members of the public arrive in-person to engage in transactions or get information related to core City 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; Environmental Control Board summonses; Disability, Clergy and other permit types. At these Public Service Centers, customers can also request meetings and reviews with the DOT Office of Construction Mitigation Coordination. By ensuring the development and provision of Citywide Mayoral initiatives in both customer service and language access, CSLA provides the critical link for LEP clients to communicate with DOT in multiple languages and receive a variety of services. CSLA is directly responsible for providing and overseeing customer service language programming in 9 DOT Public Service Centers. 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.

II. Agency Language Access Policy and Goals

Purpose

DOT Customer Service Language Access (CSLA) provides language services free of charge to customers citywide, ensuring meaningful access for LEP customers in agency programs and activities. To properly serve the rich diversity of language and transportation needs of New Yorkers, DOT must employ inclusive, innovative and systematic approaches aimed at developing and implementing customer service language access best practices. DOT communicates with LEPs in both written and spoken languages enabling them to interact and actively participate in government project planning, safety and other vital City transportation initiatives. CSLA maintains its leadership role in program development and implementation designed to provide quality language services and ensure customer readability in all languages, including English. These agency efforts support Mayor Bill de Blasio's initiatives to promote equity, diversity, as well as economic and civic engagement.

DOT's CSLA policy addresses the needs and interests of numerous language stakeholders: foremost, members of the public including LEP customers; the Mayor's Office of Immigrant Affairs; the Mayor's Office of Operations; Elective Officials; DOT Executive, managerial, supervisory and front-line staff from a diversity of divisions and units agency-wide; DOT Customer Service Language Access; the Commissioner's Correspondence Unit – CCU; DOT Strategic Communications; DOT Press; DOT Human Resources and Facilities Management; DOT Legal; DOT Public Service Centers; DOT Creative Services; DOT Street Ambassadors; DOT IT and Telecom; and other participating DOT Divisions/Units; Language Service Providers that provide Certified translators and interpreters through contracts with vendors; Citywide Language Bank Volunteers; Bilingual DOT staff; Transportation Agency partners, in the US and abroad; college and university partners in the US and abroad; DOT CSLA's inter-agency and organizational partners.

Customer Service Language Access Policies are established to ensure compliance with Local Law 30 (LL30) building upon CSLA accomplishments achieved in its first 10 years "2008-2018" since Mayoral Executive Orders 115 and 120 were issued.

- Continue to provide centralized agency-wide language translation and interpretation services utilized in various channels of agency communications;
- Continue to train DOT employees and new hires in customer service language access policies and procedures on when and how to provide language services;
- Continue to update, maintain and improve customer service language access signage posted in DOT's public service centers and 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 increase demand for such services;
- Continue to upgrade DOT's Language Access Databases 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.

Customer Service Language Access Goals

- Adopt state-of-the-art technology by end of FY19 to streamline content for greater efficiency, quality and consistency in projects requiring translation and/or interpretation;
- Design, translate, produce and install Customer Service Language Access signage in the 10 designated citywide languages by end of FY19;
- Upgrade DOT's customer service/language access request portal to facilitate a one stop shop experience for DOT project managers to request both translation and interpretation services by end of FY20;
- Provide "DOT Language Academy Certification" in three of the 10 designated citywide languages by end of FY22. By end of FY19, DOT will establish a Spanish language assessment tool and learning resources for Spanish bilingual employees who volunteer to review translations;
- Conduct a linguistic assessment in three of the 10 designated citywide languages by end of FY22. By the end of FY19, DOT will conduct a linguistic assessment of transportation Spanish vocabularies from DOT's translation library and from other transportation translation library resources to identify the range of vocabulary commonly used in transportation;
- Conduct customer service language access usability surveys in three of the 10 designated citywide languages by end of FY22. By end of FY19, DOT will conduct a language access usability survey in Spanish to determine the register most widely understood by LEP customers;
- Pending budget approval, hire staffing resources qualified in professional translation and interpretation services as well as in project management to expand and monitor implementation of DOT's language access plan by end of FY20.

III. LEP Population Assessment

1. Languages Covered

CSLA will continue to translate most commonly distributed¹ documents into a minimum of ten languages (Spanish, Chinese, Russian, Haitian Creole, Korean, French, Polish, Bengali, Arabic and Urdu), as required by Local Law 30 and Executive Order No. 120. DOT determines such documents through:

- The number of customer "hits" or "downloads" of these documents available on the DOT website;
- The number of customer requests for DOT literature shown in Siebel, 311's customer relations management system;
- When agency documents are updates or new documents are introduced, CSLA consults with senior staff and other Language Access stakeholders to determine updates to agency Essential documents.

DOT will provide interpretation services in all available languages, including, but not limited to: Spanish, Chinese, Russian, Haitian Creole, Korean, French, Polish, Bengali, Arabic and Urdu through Language Service providers with whom DOT has contracted.

¹ Internally referred as "Essential Documents"

2. DOJ 4-Factor Analysis

To properly assess LEP language access needs and to satisfy all compliance standards set forth in Local Law 30 and Executive Order 120, the Department is guided by the United States Department of Justice (DOJ) 4-Factor Analysis.

a) Factor 1 – LEP population served or encountered

Since 2015, DOT has noted four additional languages published by US Census Bureau and the 2015 American Community Survey: Yiddish, Polish, Urdu, and French.

The most common languages spoken and read by approximately 1.8 million LEP persons in New York City are²:

Language	Percent
Spanish	48.4
Chinese	17.9
Russian	6.1
Bengali	3.1
Haitian Creole	2.7
Korean	2.5
Arabic	1.6
Yiddish	1.5
Italian	1.5
Polish	1.4
Urdu	1.2
French	1.1

DOT has begun translating its most commonly distributed documents into the required Local Law 30 languages. As of the date of this report, nine documents have been translated into LL30 languages in addition to Italian. By end of FY19 when these documents are updated and revised, DOT will include Yiddish in the next batch of Essential Documents translations, as suggested by the chart above.

b) Factor 2 – Frequency of contact with LEP customers

In addition to population data provided by the Census, the 2015 American Community Survey Public; Executive 120 and the ten (10) designated citywide languages, CSLA will be guided in its decisions with respect to language access services by its measurable contact with the LEP community.

Contact is measured through DOTs record keeping of: translations; in-person and over-the-phone interpretation services; 311 customer literature requests; agency customer intake online forms and web hits.

- Translations

CSLA monitors the number and types of language translations distributed to LEPs using DOT's Language Access Database (LAD). Project managers and CSLA staff upload source materials for translation, indicating the number and language type(s) for each translation request. LAD generates reports that show the number of source documents and associated translations sorted by language. For any given date range, CSLA administra-

² U.S. Census Bureau, 2015 American Community Survey Public Use Microdata 1-Year Sample Population Division – New York City Department of City Planning (February 2017)

tors determine the number of translations produced and the number of requested languages. Additional information, such as project location, nature of LEP interaction and distribution method is also accessible through LAD. For example, in January – December 2017, CSLA fulfilled a total of 116 translation requests producing 298 translations in 19 languages, the top three of which are Spanish, Chinese, and Russian. Please see below.

2017 Document Translations		
Language	# of Translations	Percent
Spanish	83	27.9%
Chinese	46	15.4%
Russian	27	9.1%
Bengali	22	7.4%
Arabic	19	6.4%
Korean	18	6.0%
Haitian Creole	17	5.7%
French	15	5.0%
Polish	14	4.7%
Italian	10	3.4%
Urdu	9	3.0%
Greek	7	2.4%
Hindi	3	1.0%
English	2	0.7%
Yiddish	2	0.7%
Hebrew	1	0.3%
Nepali	1	0.3%
Punjabi	1	0.3%
Tibetan	1	0.3%
Total # of Translations	298	100%

- Interpretations

With respect to interpretation services, DOT has established a record keeping system that allows for monitoring the frequency of LEP customer contact through over-the-phone interpretation and in-person interpretation service details. The system shows various details for over-the-phone interpretation services and for in-person interpretation services: requested languages; call length in minutes, call volume per month; name of DOT Division requesting the service; duration of in-person interpretation service with description of event and DOT on-site contact information.

Annual demand for in-person interpretation services has grown dramatically in recent years, from 9 requests in 2015 to 49 in 2017. The total number of minutes LEO customers spent with professional phone interpreters has also significantly increased: in 2010 it was 7,974 minutes, whereas in 2017, it has more than tripled to 20,595 minutes.

- 311 Literature Requests

CSLA tracks customer requests for literature in English and in multiple languages. DOT has created service requests for customers who request information related to Alternated Side Parking regulations, Staten Island Ferry Schedule, City and State Parking Permit applications for People with Disabilities, Bike Smart Brochures and more. CSLA fulfills customer literature requests by mailing hard copies of these documents available in English and in multiple languages.

- Online Web Forms

Customers write to the DOT Commissioner or the Borough Commissioner using agency translated “online web forms.” These drop-down menus provide LEP customers an easy way to communicate their concerns, requests, or comments. Customer communications received through this channel on the DOT website can be sorted by language, tracked and monitored. Web form drop-down menus are currently available in 9 languages, including English. CSLA plans to translate the drop-down menus into additional languages to comply with 10-language Local Law requirement.

- Web Hits

Customers access materials in languages other than English on the DOT website; for example, the DOT mission statement is available in multiple languages and customers may access web pages containing links to other translations. DOT easily tracks the most visited pages overall where customers obtain information, for example, regarding alternate side parking, parking permits for people with disabilities and bicyclist safety. In 2016, members of the public visited 1,000 links on DOT’s website, resulting in 360,049 separate visits, which includes links in languages other than English. Forty-nine (49) links in languages other than English generated 97,737 of the 360,049 visits.

c) Factor 3 – The nature and importance of the program, activity or service

DOT provides transportation services to members of the public that address social, economic, safety, environmental and quality of life needs. DOT fosters dialogue with individuals and communities throughout NYC while responding to public concerns, comments, questions and/or inquiries. The general public communicates these concerns, comments, questions or inquiries through multiple channels as explained above.

Based on requests for information and materials, and requests for interpretations, the public-at-large, as well as the LEP community, turn to DOT very often for information about alternate-side-of-the-street parking regulations, the Staten Island Ferry schedule, and information and applications for parking permits for people with disabilities. Consequently, much attention is paid to these programs.

Notwithstanding the frequency with which the public approaches DOT for information and materials, DOT is also keenly aware that its efforts at furthering critical missions and initiatives – most notably, Mayor de Blasio’s Vision Zero initiative – requires extensive outreach, which, in turn, requires effective communication with communities, including, very often, LEP communities. Consequently, while DOT’s CSLA has always worked closely with the Borough Commissioners and planners in their outreach efforts, the CSLA is now partnering even more closely with offices of the Borough Commissioners to provide language services on Vision Zero, critical initiatives, specific street improvement projects and other programs. Effective communications in both translations and interpretation services is vital to ensure customers receive accurate and timely messages.

d) Factor 4 – Resources available to your agency

To appropriately meet the increasing demands for language services DOT has identified the need to reassess and expand its pool of existing resources. DOT continues to demonstrate its commitment to language access by maintaining a centralized language services operation consisting of: CSLA Executive Director and (1) Deputy Director; (1) Associate Staff Analyst; (2) Community Associates (translators/interpreters); (1) Graphic Artist;

(1) Clerical Associate; and (4) College Interns. DOT's Language Access Coordinator is Eleanor DiPalma, Ph.D. who reports to DOT's Chief of Communications.

In addition to CSLA's staff resources, a variety of language services are provided through the Citywide Language Services contract such as: translations, in-person interpretations; over-the-phone interpretations; transcription and sign language interpretation. All of these resources are complemented by DOT bilingual staff and by language volunteers who are registered through the Citywide Volunteer Language Bank (VLB) portal.

Internal agency resources, include but not limited to:

- DOT Customer Service Language Access centralized operation
- Citywide Language Bank Volunteers
- DOT Office of Diversity and EEO
- DOT Bilingual employees
- DOT front-line employees in public service centers located in all boroughs
- DOT employees engaged in strategic communications, training and technology

Inter-agency customer service language access resources/partnerships

CSLA continues to work closely in partnership with the Mayor's Office of Operations and the Mayor's Office of Immigrant Affairs utilizing their resources as well as offering DOT resources to expand and improve customer service language access to the benefit of customers and agencies citywide. CSLA hosts annual "Partners in Process" forums to establish, promote and reinforce customer service language access best practices utilizing a wide range of resources.

Agency wide Community Partnerships

Multiple DOT units are responsible for conveying vital transportation communications in English and in the covered languages.

DOT Project Managers and Community Liaisons interface with the public through a variety of channels (online; social media; community meetings; customer walk-in centers; phone, email and U.S. mail correspondence).

CSLA Other Than Personnel Services - OTPS

CSLA recognizes the need to adopt industry standard technological tools used by professional translators, such as translation memory software that includes electronic glossaries and style guides. With these additional tools, DOT will analyze increasing volumes of translated content produced since 2008 and use the results of that analysis to design and implement LEP customer surveys. The purpose of the surveys is to determine the register of language that customers understand to ensure readability and comprehension. These tools will significantly improve DOT's management of translation processes resulting in greater business flow efficiency and a higher volume of translations.

IV. Provision of Language Access Services

1. Translation

DOT continues to provide meaningful access to LEP customers, ensuring and moving beyond translation compliance with Executive Orders and Local Law 30. Prior to Local Law 30, DOT had been translating its most commonly distributed documents into two additional languages (Polish and Bengali) over and above the "Top

Six” language Executive Order 120 requirement. DOT has begun translating its most commonly used documents in ten languages as required by LL30.

a) Plain Language (English and 10 Local Law 30 languages)

Since 2009, DOT had utilized both internal and contracted resources to revise English documents and correspondences for readability. Since the need for language services has significantly increased, DOT has explored a more comprehensive approach to revising and redesigning its “Essential Documents” (in English) for clarity. In June 2017, DOT commissioned the services of Language Line Solutions (LLS) through a small purchase agreement to assess, analyze and evaluate DOT’s “Essential Documents” related to a variety of transportation services such as bicycle safety, parking regulations, special permits, and street lighting. LLS provided its observations and recommendations aimed at simplifying the entire set of 32 documents by categorizing the content; providing visual consistency across documents; reducing redundancies; utilizing familiar words; and reducing word count by 66%. DOT will consider using several plain language contracting resources to revise its “Essential Documents” beginning with Parking Permits and Customer Service applications, brochures and forms.

DOT recognizes that a linguistic analysis of its translation library is required to establish plain language guidelines in the LL30 languages. The results of a comprehensive linguistic analysis will yield highly valued findings useful to DOT customers and to other City agencies. DOT plans to utilize consultant services to begin analyzing its library of written and published translations for clarity. DOT will analyze the body of works available in its library of Spanish, Russian and Chinese translations, beginning with Spanish (the most widely spoken language in NYC) to determine the register of vocabulary including transportation terms, ensuring customer readability and comprehension.

b) Translation and Technology

In 2009, while envisioning the steady and increased demand for language services into the near future, DOT in partnership with DOT IT, created a language services database that serves as a request portal, providing direct access for CSLA DOT internal resources who regularly communicate with LEP communities concerning traffic improvement projects, Vision Zero and other essential transportation services. DOT continues to recognize technology as an essential programmatic infrastructure through which these vital language services can be delivered more directly and more timely to customers.

As part of its 5-year implementation plan in partnership with MOIA, MOO and DOITT, DOT is considering a variety of available technological tools such as translation management and translation memory online cloud-based software, and the like that will leverage the value gained in the more than 1,000 translations thus far produced and reviewed by CSLA over the years. CSLA in cooperation with its IT team is exploring translation data management options suitable to processing the 10 designated citywide languages.

DOT will continue to post engaging content on social media to inform customers of agency core services, projects, and initiatives. Members of the public are invited to: attend a variety of events; relay service updates and respond to requests for information and services. Social media content is provided in languages other than English. Because social media content is viewed online, many users opt to utilize translation features already available in social media channels or through the user’s web browser. Project and event notices are often translated based on the language needs of the community where the event is taking place. When these multi-lingual documents are available, DOT publishes them directly, or through links, on social media channels. DOT’s Communications Team works closely with the Mayor’s Office of Digital Strategy to share content with the City of New York’s channels, including Ciudad de Nueva York on Twitter and Facebook.

2. Interpretation

DOT continues to provide professional interpretation services, free to customers, offering more than 170 languages through language service providers: Language Line Solutions (over-the-phone) and Accurate Communication (in-person). In the past eight years, CSLA has noted a significant rise in the provisions of both in-person interpretation and over-the-phone interpretation services.

a) In-person

Annual demand for in-person interpretation services has grown dramatically in recent years, from 9 requests in 2015 to 49 in 2017. CSLA works closely with various DOT Units and Divisions to arrange for professional in-person interpreters depending upon the DOT Unit service request. Interpreters are deployed throughout the five boroughs to facilitate communications with LEP customers at community based meetings, hearings, special events such as the Mayoral debate; Safety education workshops; and for public surveys. In addition to the contractor's screening and selection of interpreters, CSLA provides additional screening to ensure the specific requirements requested by the DOT Unit are met. For example, CSLA requests and ensures that certain interpreters are assigned based on: experience; spoken dialect; familiarity with the DOT project and terminology; and their expertise in either simultaneous or consecutive mode of interpretation. For customers who require in-person sign interpretations, DOT utilizes vendor services as well as resources available through the Mayor's Office for People with Disabilities.

b) Over-the-phone

CSLA continues to utilize professional over-the-phone interpretation vendor services. Twenty-nine over-the-phone interpretation accounts have been set up for agency Public Service Centers as well as administrative offices to access interpreters on behalf of LEPS. Recently CSLA added an account for Highway Inspection Quality Assurance (HIQA) inspectors who interact with LEP customers in the field. CSLA manages monthly invoices that show call volume, call duration, date and time of call as well as the language type accessed. The demand for over-the-phone interpretation services increased significantly between 2010 and 2017. DOT facilitated language access for LEPS over-the-phone for 7,974 minutes in 2010 whereas in 2017, the total number of minutes more than tripled to 20,595 minutes.

c) Interpretation and Technology

CSLA continues to explore video remote interpretation tools that may allow DOT Street Ambassador Team to access interpreters for LEPS and for people with disabilities in the field in more appealing and suitable ways. DOT Street Ambassadors meet New Yorkers in busy areas near transportation project sites to hear their concerns and engage them in the planning and development of DOT projects regardless of their background or the language they speak, moving NYC closer toward to a more inclusive and just planning process.

Bilingual Staff and Translation/Interpretation Services

To continue supplementing agency language services provided by professional interpreters and translators, DOT utilizes the services of DOT bilingual employees who provide volunteer language services. Bilingual employees are encouraged to assist CSLA in one-on-one oral communications and/or by reviewing brief translation projects. DOT especially values the services provided by bilingual staff since their contributions are not part of their job requirements. DOT reinforces the participation of agency bilingual staff, promoting the Lan-

guage Volunteer program and providing language services tools through postings on DOT's Intranet as well as in email communications.

3. Notification of Free Interpretation Signage

Notice of "Free Interpretation Services" is available to customers in a variety of channels:

- Electronic signage and posters
- "Welcome" palm cards
- "I Speak" cards
- Language Assistance booklet for 55 Water Street customers

In partnership with DOT IT, CSLA plans to install electronic signage that includes notice of "Free Interpretation Services" in agency public service centers throughout the five boroughs.

4. Emergency Preparedness

In the event of an emergency, the DOT Press Secretary is responsible for adhering to a multi-agency communication protocol administered by NYPD and for advising CSLA immediately if any immediate translation and/or interpretations services are needed. The Language Access Coordinator will work closely with the Press Secretary and the Director of Strategic Communications, all reporting directly to DOT's Chief Communications Officer to prepare and immediately handle agency emergency responses in multiple languages with direct and proper oversight.

V. Training

a) Policies and Procedures

CSLA ensures all front-line public facing staff as well as administrators, supervisors and managers are trained in "Language Access Policies and Procedures." Training in "Voter Registration Assistance" is also provided in accordance with "Local Law 29" and "Mayoral Directive 1." Front line staff in the field and office from various DOT offices, such as Public Service Centers; Offices of the Borough Commissioner; Staten Island Ferry; Litigation Support, participate in annual face-to-face training and/or eLearning programs. CSLA tracks the number of employees trained each year by maintaining participant attendance sheets (in face to face learning formats) for input into CSLA's training records and by generating training completion reports from the eLearning system (also inputted into CSLA's training records).

The CSLA team is responsible for the design and delivery of Customer Service Language Access and Voter Registration Training. Training curricula and new methods of training delivery are updated to ensure employees are aware of current policies and procedures.

Language Access Policy and Procedures Training provides the rationale for DOT's customer service language access program and explains how and when DOT employees should facilitate language access, emphasizing customers' right to comment, complain or ask for more information. For example, in face to face training, DOT employees engage in role plays to understand how to access an over-the-phone interpreter and how to lead a three-way call with a professional interpreter and LEP customer. Staff are trained to show professional courtesy and care to customers. Newly hired front line staff receive this training in addition to the general DOT Orientation.

b) Bilingual Employees

DOT plans to invest in its human capital by providing a language support program to employees registered in the Citywide Language Bank and to DOT bilingual employees. Many of these employees are immigrants or members of immigrant families who are knowledgeable of transportation vocabularies and able to serve as field experts. CSLA partnering with DOT Learning Center will offer opportunities for volunteers to complete a language assessment and access language resources to reinforce proper grammar and use of transportation vocabulary in both translation reviews and interpretations.

VI. Record Keeping and Evaluation

Currently, DOT uses LAD (Language Access Database) to monitor and track the routing of document translation requests, clarity reviews, cost estimates and finalized translations. LAD generates reports that show the number of source and target documents as well as the number and type of translations produced.

In addition to further developing LAD as a language access request portal for use by DOT Divisions and Units agency wide, CSLA plans to adopt and utilize state-of-the-art technology such as translation management and translation memory software that will give DOT the technological capability to generate language access analytics. These technologies will allow DOT to properly analyze and monitor the volume and quality of translated content and produce analytics for improved management and cost effectiveness.

With respect to interpretation services, DOT has established a manual record keeping system that allows CSLA to monitor over-the-phone interpretation and in-person interpretation service details. The system shows the following details for over-the-phone interpretation services (call-length in minutes; call-volume per month; requested languages; name of DOT Division requesting the service) and for in-person interpretation services (requested duration of interpretation service; description of event; requested languages; DOT on-site contact information). CSLA continues to develop plans to update LAD to include additional functionality that will automate the tracking of over-the-phone and in-person interpretation service details.

CSLA continues to upgrade LAD making the user experience more streamlined and direct. For example, end users will be able to select multiple languages for translation requests without refreshing the page and LAD administrators will be able to search documents by language and more easily track translation costs.

CSLA monitors and tracks incoming LEP customer correspondences received in multiple languages through DOT web-forms. These correspondences are populated into Agency Response Tracking System (ARTS) which automatically sends email notices to the designated CSLA mailbox "languageaccess@dot.nyc.gov" for translation and response utilizing professional contractor services. CSLA plans to continue monitoring and tracking the number of bilingual staff interactions with LEPs indicated in monthly activity summary reports generated from the Citywide Volunteer Language Bank system.

Pending budget approval to adopt industry-standard translation technological tools, CSLA will adopt translation management and translation memory software to leverage the value gained in more than 1,000 translations thus far produced and professionally reviewed. With these tools CSLA will monitor and evaluate the quality of the 10 designated citywide languages translations more effectively and efficiently through special automated features such as analytics, glossaries and style guides in the 10 citywide designated languages.

VII. Resource Analysis and Planning

DOT considers and addresses the changing needs of language access services by noting consistent trends reflecting significant increases in the demands for services while ensuring adequate numbers of qualified DOT staff and contracted specialists meet those demands. Pending budget approval, DOT will outsource consultant services in plain language, customer surveys, and linguistic assessments and hire staff with specialized qualifications in: language translation, interpretation, project management and computer applications. Where possible, DOT will utilize City resources through specialized agreement with The City University of New York or secure the necessary resources through grant funding in partnership with the University Transportation Research Center or other available grant resources government posted on www.grants.gov. DOT's plan to adopt these services is referenced in more detail in other areas of this report.

CUNY and other College/University partnerships

DOT continues to develop partnerships with The City University of New York providing supervised college student internships in customer service/language access and computer application. DOT works closely with Hunter College faculty developing comprehensive language access internships and college curricula that incorporate NYC DOT vocabulary in three of the 10 designated citywide languages: Spanish, Chinese and Russian. DOT has developed a working relationship with Baruch College Survey Research Center and is considering utilizing their services to achieve goals outlined in CSLA's 5- year implementation plan.

Qualified Language Agency Personnel

DOT plans to continue reassessing the qualifications and competencies of its existing staff resources to ensure that the language access project milestones described in this plan can be satisfactorily met. Recently, DOT hired two full-time staff members who had been trained by CSLA during their Language Access college internship where they developed competencies in Spanish and Russian translation. These unit staff were hired because of their qualifications and demonstrated language competencies and community service. CSLA will continue to maintain college internship guidelines and materials including activity records of all college students who have successfully completed their language access internship requirements for the baccalaureate degree in translation and interpretation.

Utilizing industry-standard technological tools and qualified staff, CSLA expects that DOT's development of translation standards will be applied by agency and interagency language stakeholders including Language Bank Volunteers, Language Service Providers and other stakeholders. Pending budget approval, DOT plans to hire additional qualified staff: 2 full-time (1 Chinese translator/interpreter and 1 Computer Application Developer) in addition to 7 part-time translators/interpreters.

These additional staff will provide necessary services related to:

- Computer Application Developer and Translation Management IT Administrator
- Language Services computer-systems upgrades
- IT administrator of online translated DOT web content (Inter/Intranet communications)

Full-Time Chinese Translator/Interpreter

- Manage Chinese translation/interpretation projects
- Liaise with language stakeholders (DOT field experts and all other partners) to facilitate vetting of updates and further development of the DOT Chinese glossary and sections of Citywide LBV glossary

- Engage with the LEP community to enhance CSLA services
- Serve as primary agency resource in Chinese transportation vocabulary for translation and interpretation services

VIII. Outreach and Public Awareness of Language Access Services

CSLA works closely with various DOT units providing public outreach and community dialogue regarding: Vision Zero; traffic improvements, public spaces, bicycle safety, accessibility, transit development and other program areas vital to DOT's diverse transportation services network. CSLA will continue to use and develop its resource and promotional materials such as translated signage, interactive game boards, college internship brochures, compendium of CSLA newsletter articles and welcome palm cards. These materials are designed to inform the general public of DOTs language services as well as other language stakeholders such as DOT employees and college interns.

CSLA resource materials available to the public:

- Compendium of customer service language access articles
- College internship brochure that informs students of available DOT supervised internship opportunities and benefits
- Posters and other promotional materials with the CSLA brand
- Language Assistance Book containing directions and notice of free interpretation for distribution at DOT headquarters - 55 Water St. Building and Security

CSLA plans to develop translated content on the DOT website to increase public awareness of agency free translated and interpretation services.

IX. Language Access Complaints

DOT has an established procedure for handling customer complaints. Customer complaints are routed through 311 Siebel system, into DOT's Agency Response Tracking system (ARTS) for final routing to the CSLA mailbox "languageaccess@dot.nyc.gov." CSLA is responsible for reviewing, handling and responding to language access complaints.

During annual Language Access Policy and Procedure training, DOT managers, supervisors and front-line staff are informed of agency procedure for processing language access complaints, questions and requests. Additionally, to ensure managers, supervisors and front-line staff are aware of the agency procedure, CSLA installs and maintains signage in DOTs public service centers that informs customers (in the designated 10 citywide languages + English) of their rights to complain, question and request services. Customers are informed to call 3-1-1 or speak to a DOT manager or supervisor.

Required timeframe for DOT Language Access to acknowledge and/or respond to customer complaints, questions or requests is no longer than 14 days. CSLA plans to post this established agency procedure for handling customer questions, complaints and requests on DOT CLSA Intranet pages.

X. Implementation Plan Logistics

Language Access Goal	Milestones	Responsible Staff	Deadline
Provide DOT Language Academy Certification in <i>Spanish</i> to LBVs and DOT bilingual employees	<ul style="list-style-type: none"> • Develop and administer language proficiency testing and retesting • Provide training in language proficiency • Provide proficiency retesting 	CSLA Community Associate—Spanish College Interns	2018 – 2019
Provide DOT Language Academy Certification in <i>Russian</i> to LBVs and DOT bilingual employees	<ul style="list-style-type: none"> • Develop and administer language proficiency testing and retesting • Provide training in language proficiency • Provide proficiency retesting 	CSLA Community Associate—Russian College Interns	2020 – 2021
Provide DOT Language Academy Certification in <i>Chinese</i> to LBVs and DOT bilingual employees	<ul style="list-style-type: none"> • Develop and administer language proficiency testing and retesting • Provide training in language proficiency • Provide proficiency retesting 	CSLA Community Associate—Chinese College Interns	2021 – 2022
Expand community outreach	<ul style="list-style-type: none"> • Design and distribute additional materials in a variety of formats (online, hardcopy, electronic signage) notifying customers of free interpretation and translation services • Engage in LEP dialogue at community meetings 	CSLA Graphic Artist CSLA Clerical Associate CSLA Community Associates	2018 – 2022

<p>Develop NYC DOT Translation/Interpretation Standards</p> <p>A. Translation Management and Memory Software</p>	<ul style="list-style-type: none"> Select and purchase suitable software for use in translating Spanish, Russian, and Chinese content for DOT webpages and documents Adopt translation management and memory software 	<p>DOT CSLA and IT in consultation with DoITT and MOIA</p>	<p>Spring 2018</p>
<p>B. Glossary and Style Guide in Spanish, Chinese, and Russian</p>	<ul style="list-style-type: none"> Develop Spanish, Chinese, and Russian Glossaries and Style Guides 	<p>CSLA Community Associates - Spanish and Russian</p> <p>CSLA Community Associate - Chinese and Computer Associate, pending budget approval</p> <p>College Interns</p>	<p>2018 – 2020</p>
<p>C. Glossary and Style Guide in remaining LL30 Languages</p>	<ul style="list-style-type: none"> Develop glossaries in remaining LL30 Languages 	<p>Part-time translators, pending budget approval</p>	<p>2020 – 2022</p>
<p>D. Plain Language Survey</p>	<ul style="list-style-type: none"> Identify the representative sample of LEP customers in Spanish, Chinese, and Russian Develop and Implement Survey 	<p>Consultants (linguists and survey researchers)</p> <p>DOT LBVs and bilingual staff</p> <p>CSLA Community Associates (Spanish, Russian and Chinese) & Computer Associate</p> <p>College Interns</p> <p>Graphic Artist</p>	<p>2019 - 2020</p>
<p>E. Plain Language Revision of Essential Documents</p>	<ul style="list-style-type: none"> First draft plain language revision of Parking Permits and Customer Service unit applications, brochures and forms 	<p>DOT staff – CSLA and Parking Permits and Customer Service and Plain Language Consultant Team</p>	<p>2019 - 2020</p>

<p>F. Increase public awareness of CSLA</p>	<ul style="list-style-type: none"> • Expand existing translated content on DOT's external website • Publish DOT Essential documents on DOT's external website 	<p>CSLA staff Community Associates</p> <p>CSLA Community Associates (Spanish, Russian and Chinese) & Computer Associate</p> <p>College Interns</p> <p>Graphic Artist</p> <p>Clerical Associate</p>	<p>2020 – 2022</p>
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Language Access Implementation Plan

New York City Department of Veterans' Services

July 2018



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Language Access Coordinator: Gabriel Ramos, Deputy Press Secretary

Agency Mission and Background

Fostering purpose-driven lives for New York City service members, veterans, and their families.

The New York City Department of Veterans Services (DVS) was created in April 2016. As a stand-alone agency, DVS can provide the full range of benefits to New York City service members, veterans, and their families. While DVS is not a direct services agency, it is a centralized hub able to put veterans at the center of all our efforts. We coordinate services with agencies at the City, state, and federal level, as well as through public-private partnerships.

Our mission is straightforward -- to foster purpose-driven lives for NYC service members, veterans, and their 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 earned 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 needed to help veterans navigate the NYC rental market. This includes:

- Veteran Peer Coordinator (VPC) program: veterans and military spouses 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 transitions into housing.
- Housing Coordination Center: a one-stop housing placement service to affordable housing owners and property managers.

2. Whole Health and Community Resilience

DVS connects veterans and their families to their communities through what we call the VetsThriveNYC Core 4 model of care. The model is a pyramid with four tiers. The largest, bottom tier is Culture: arts programs geared towards veterans' experiences. The next tier up is Connection: establishing ties with peers. Third is Community: linking veterans with holistic services within their communities. And at the very top is Clinical care: connecting veterans to help in clinical environments.

The VetsThriveNYC Whole Health Program consists of two components:

- Consortium Steering Group: Community experts who serve as leads for each of the Core4 domains and engage the broader NYC community to form the City-wide consortium
- Core4 Whole Health Model: Non-linear dynamic model focused on four domains to address the full impact of war on the mind, body & spirit.

3. City Employment, Education, Entrepreneurship, Engagement & Events

DVS is dedicated to getting veterans the education they need, finding fulfilling and sustainable jobs, or if they prefer, creating their own business opportunities. DVS recognizes that it is not enough to ensure veterans have a place to live. They need the means to live. And just as important, they need to do work that fulfills them.

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 now has satellite offices in place 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.

Agency Language Access Policy and Goals

DVS's Language Access Goal is to strategically manage and deliver information for a multilingual audience.

Our agency plans to:

- A. Provide language access services in all designated citywide languages
- B. Develop and implement a language access implementation plan
- C. Provide 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 agency website

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

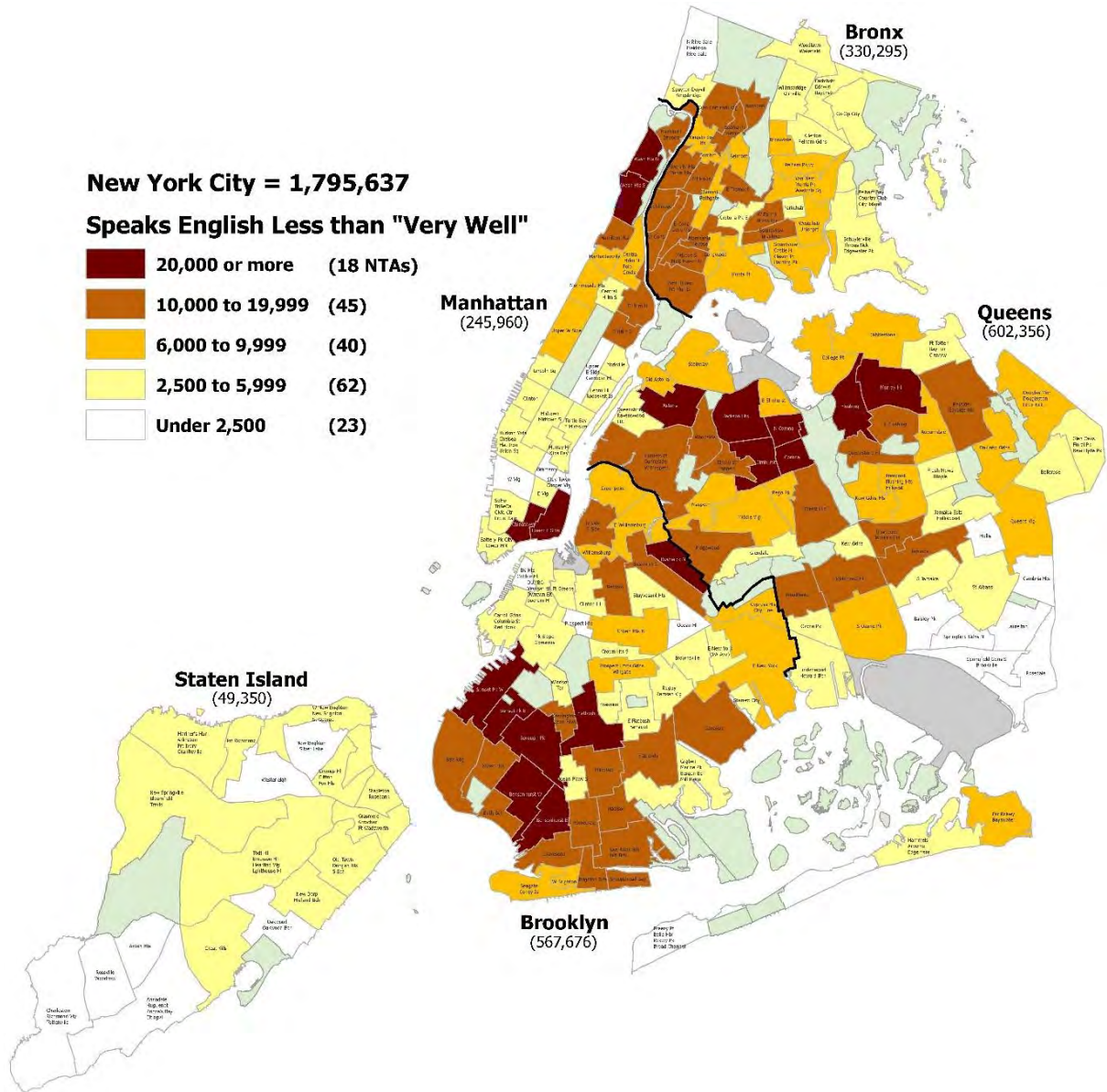


Figure 1 Population 5 Years & Over with Limited English Proficiency by NT NYC 2009-2013 (NYC Department of City Planning)

In figure 1, there are 1,795,637 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.

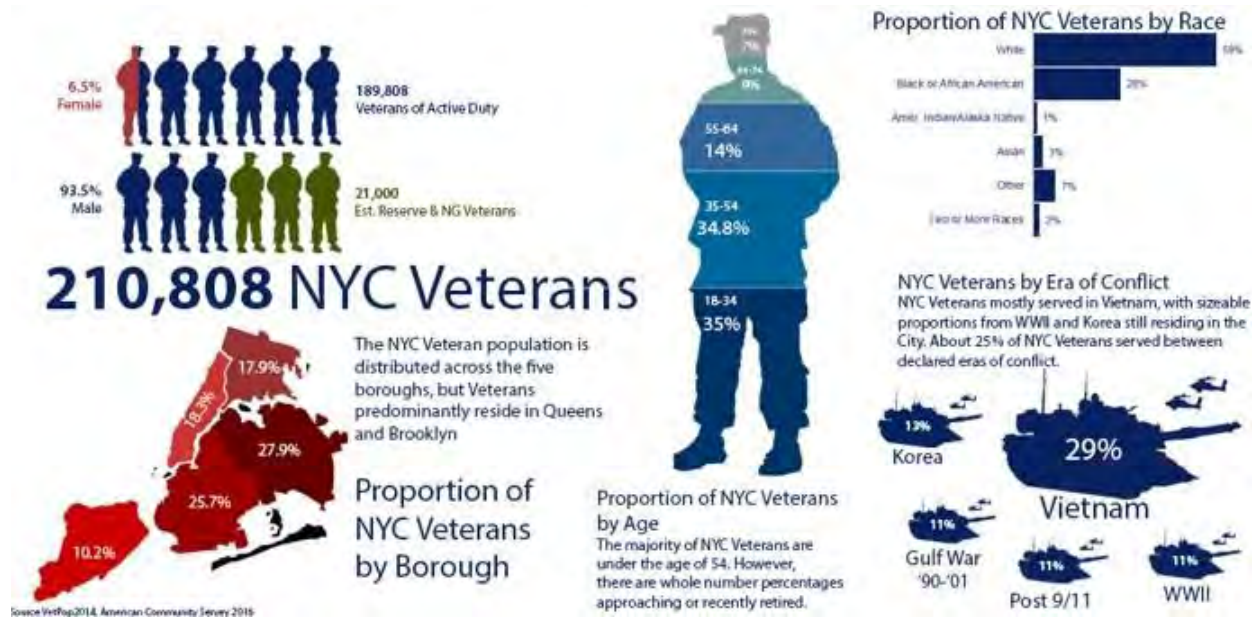


Figure 2 Proportion of NYC Veterans (NYC Department of Veterans' Services)

According to U.S. Census (2012-2016 American Community Survey 5-Year Estimates), there are 167,591 veterans in New York. However, DVS uses a comprehensive approach to count its eligible service population. As of 2017, DVS considers 210,808 New York City veterans as its core constituency. We also serve, 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.

DVS also serves family members who might not be as proficient in English. As of April 2018, 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.

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 DVS is still 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.

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 2016, DVS has incurred the following costs:

Type of Service	Vendor	Instances	Costs
Telephonic Interpretation	N/A	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 FY19 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 in language service requests/complaints and will adjust to its constituents’ needs and staff performance.

Provision of Language Access Services

DVS will provide language access services in the designated citywide languages.

Translation Services

The Language Access Coordinator (LAC) will work with each Line of Action to identify the most-commonly distributed documents to the public. Documents that contain or elicit important and necessary information regarding the provision of “basic city services,” support key agency functions, and focus on what constituents must know will be reviewed and 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. Data gathered for the purposes of providing language service will serve as a guide to any future changes to what constitutes a commonly distributed document.

Following the Plain Writing Act of 2010, DVS will review and revise previously generated documents. The agency will also ensure newly developed documents enable constituents to a) find what they need, b) understand what they find, and 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



- 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 online tools is not on par with the level of a contracted vendor. Yet, this solution is still the best given the ephemeral nature of social media posts.

Interpretation Services

In-person Interpretation

DVS intends to provide interpretation services where it is deemed necessary 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.

2004 Census Test		United States Census 2010
LANGUAGE IDENTIFICATION FLASHCARD		
<input type="checkbox"/>	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/>	Խոսողում ե՞նք 'նչում' կատարե՞ք այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն:	2. Armenian
<input type="checkbox"/>	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali

Figure 3 U.S. Census Language Identification Flashcard (U.S. Department of Commerce)

DVS will also consider free interpretation 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 the quality of interpretation services.

Telephonic Interpretation

DVS also interacts with clients over the phone. The agency will seek to provide telephonic interpretation in at least 100 languages. If a staff member is unable to identify the LEP's spoken language, customer service from a contracted vendor would be able to assist. 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 procure and post multilingual signage regarding the provision of free interpretation services. These visual cues (example below) will be posted at the main office, borough centers, and during public events. DVS will design its own signage or outsource a design similar to other

city agencies.



Figure 4 Example of a sign showing the availability of interpretation services (Mount Desert Island Hospital)

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 would 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.

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 Lines of Action. 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 maintain ownership of tracking and certifying trained employees.

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...)

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 any potential source of data 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 continued 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). DVS will also solicit feedback about these services from staff and clients.

Resource Analysis and Planning

Currently, DVS does not have the full capacity to provide comprehensive language access. Nonetheless, the agency is working to integrate language access requirements in the upcoming budget. In the interim, DVS will follow through its language access implementation plan.

DVS has access to city resources and bilingual staff. The agency plans to use language proficient staff and contract any necessary services through NYC DCAS Citywide Language Services. The recent establishment of DVS enables agency to start from a clean slate and easily identify gaps in language access. Furthermore, DVS's smaller 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.

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. Still, the agency plans to increase public awareness of language access services.

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.

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. A functional email address would be considered as another source for questions, requests, and complaints.

The LAC would also 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 public can submit language access complaints, questions, and requests	Agency 311 Data (CY 2017)	Description of how complaints/requests were addressed
<ul style="list-style-type: none"> • Online form on our official webpage under “Contact Us.” <ul style="list-style-type: none"> ➤ “Send a message to Commissioner Sutton” • Call <ul style="list-style-type: none"> ➤ 311 ➤ 212-416-5250 • Email <ul style="list-style-type: none"> ➤ press@veterans.nyc.gov • In person 	# of language access complaints received via 311: <ul style="list-style-type: none"> • 0 	Not applicable
	#of requests for language access services via 311: <ul style="list-style-type: none"> • 0 	Not applicable

<ul style="list-style-type: none"> ➤ 1 Centre Street 22nd Floor, Suite 2208 New York, NY 10007 • Tweet or Direct Message <ul style="list-style-type: none"> ➤ @nycveterans • Comment or Send Message <ul style="list-style-type: none"> ➤ nycveterans 		
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* The table has hyperlinks to our online form, email address, Twitter handle, and Facebook page

Emergency Preparedness Plan

The NYC Department of Veterans’ Services has updated 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.

Implementation Plan Logistics

Language Access Coordinator

Primary: Gabriel Ramos, Deputy Press Secretary

Language Access Goal	Milestones	Responsible Staff	Deadlines
Familiarize DVS leadership with Local Law 30	<ul style="list-style-type: none"> • Review MOIA LL30 guidance for agencies • Appoint a Language Access Coordinator • Draft a Language Access Implementation Plan 	Language Access Coordinator	March 2018
Begin compliance with Local Law 30	<ul style="list-style-type: none"> • Review MOIA’s feedback • Submit information on language access complaints/requests received • Submit final Language Access Implementation plan 	Language Access Coordinator	May 2018
Improve data collection, retention, and management	<ul style="list-style-type: none"> • Identify opportunities to collect data about LEPs • Implement changes to data sources to capture language pertinent information 	All of DVS staff	Ongoing

Language access standards	<ul style="list-style-type: none"> • Manage and analyze collected data • Train frontline staff and managers • Establish and disseminate agency-wide language services performance metrics 	Language Access Coordinator	Ongoing
Update the annual language access complaints and requests for services	<ul style="list-style-type: none"> • Report on the number of complaints received and how the complaints were resolved • Describe progress in meeting the milestones outlined in the plan 	Language Access Coordinator	April 2019

Given DVS's recent establishment and smaller size, the table above presents a reasonable timeline that addresses each of the requirements of the 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 year, DVS will periodically review its plan and, when necessary, consider impactful changes.

NYC Emergency Management Language Access Policy

NYCEM Language Access Coordinator: Christina Farrell, Deputy Commissioner of External Affairs

I. Background and Mission

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.

NYCEM's mission is to plan and prepare for emergencies; educate the public about preparedness; coordinate emergency response and recovery; collect and disseminate emergency information; and seek funding to support preparedness. This mission charges NYCEM 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. NYCEM works to ensure information gathering, decision making, and resource allocations are carried out efficiently.

NYCEM Programs

Emergency Preparedness Education

In response to New Yorkers' growing concerns about public safety, NYCEM 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 10 [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 (all guides are printed in English, Spanish, Chinese, and Russian; all other languages are available as downloadable pdf files). Ready New York also has two preparedness videos available in English, Spanish, Mandarin, and Russian.

NYCEM has developed 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 other agencies and community partners working with people with limited English proficiency, NYCEM has been utilizing proactive strategies to

disseminate translated materials. Targeted mailings, direct community outreach and media coverage to ethnic media outlets are just a few examples.

The NYCEM website is ADA compliant. Ready New York guides are also available in audio format. Guides can be accessed via nyc.gov/readynewyork.

Community Preparedness

NYCEM Community Preparedness works with local leaders to provide a direct connection to emergency planning resources and information. Throughout the year, NYCEM 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.

In an effort to prepare New York City's immigrant and communities with limited English proficiency, NYCEM Community Preparedness in collaboration with Mayor's Office of Immigrant Affairs and City University of New York, produced "The Storm", the 10th installment of the Emmy award-winning We Are New York (WANY), now [We Speak NYC](#) series geared towards English-language learners. The 25-minute episode focuses on emergency preparedness and access to City resources during emergencies and can be used in conjunction with a [toolkit](#) of Ready New York preparedness tools and learning materials developed specifically for adult language learners. The toolkit is designed for use by English as a Second Language (ESL) instructors, community-based groups, and volunteer conversation group leaders interested in helping New Yorkers improve their English while learning how to plan, prepare, and get informed during emergencies. The WANY program offers an innovative approach to addressing barriers to preparedness education and information among linguistically isolated communities through incorporating various outreach and programmatic strategies, and leveraging local level community networks in building preparedness efforts.

NYC CERT (Community Emergency Response Teams)

NYCEM also manages the NYC CERT (Community Emergency Response Team) program. This program features over 50 community-based teams that are made up of local volunteers trained to engage their communities in disaster preparedness and emergency response. NYC CERT works to recruit a diverse group of residents that accurately 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 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 are called to conduct Ready New York emergency preparedness presentations in languages other than English and assist emergency operations when there is a need for translation or interpretation services. CERT members also review the translations of NYCEM guides and other printed material to ensure cultural and linguistic consistency.

Notify NYC

Notify NYC is the City of New York's official source of information about emergencies. Non-English speaking subscribers have access to messages in 13 different languages, audio format, and American Sign Language (ASL). Notify NYC's multilingual messages span a variety of emergency situations, including pre-scripted mass transit alerts, fire department activity, public health and safety notifications, utility alerts, weather alerts, alternate side parking updates, and downed trees notifications.

Media and Ad Campaigns

NYC Emergency Management runs seasonal, general, and hazard-specific multi-lingual 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, 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 three million New Yorkers living within the city's hurricane evacuation zones.

II. Language Access Goals

NYCEM is not a social service agency and as such does not provide direct services to New Yorkers.

During an emergency, NYCEM 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, NYCEM makes every effort to make the information available and accessible to all New Yorkers. While the capability of NYCEM'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. As an agency, NYCEM continually evaluates how it interacts with and supports communities in New York City, including populations with Limited English proficiency and other vulnerable populations.

In addition, as described in the Record Keeping section of the plan, NYCEM tracks distribution of its emergency preparedness material, including number of guides distributed in languages other than English, through its event management database.

III. People with Limited English Proficiency Assessment

As a coordinating agency, NYCEM works with the lead agency in any emergency to ensure that language needs are identified and that language translation and interpretation assistance is provided to the degree possible.

NYCEM is not a direct service agency, but supports other City agencies by conducting a demographic assessment through its GIS unit for each incident NYCEM coordinates at the time of the event. The information is then shared with agencies responsible for providing services during and after the incident. Services are provided in the languages of the affected community. These languages vary and may be different than the languages listed in Local Law 30. Since emergencies are unpredictable in nature and frequency, assessing the language access needs of affected populations is possible only after the emergency occurs. NYCEM is operational 24/7, so conducting demographic assessments after an emergency is one of the first steps NYCEM takes, by obtaining information from the field and pre-existing GIS databases. Language Access is coordinated among City agencies participating in the emergency response as described in the Citywide Language Access Protocol.

IV. Provision of Language Access Services

NYCEM regularly provides language access services for its emergency preparedness events as described in the Ready New York section of this protocol.

During an emergency, should service centers be activated, the leading service agency is responsible to provide language assistance through professional services. In addition, each agency providing services at a service center is responsible for providing language assistance for their clients. Signage at service centers, flyers and necessary informational materials are translated into the languages of affected communities and made available for distribution at the centers as public information becomes available.

NYCEM emergency plans address the need for language assistance at service centers and lead agencies are identified for providing services to affected residents. The lead agency assumes the responsibility for language assistance based on Local Law 73 and Local Law 30. Updated information is provided to 311 operators on a regular basis, and 311 services are available in more than 160 languages. The need for language assistance and the provision of language services is monitored by members of the External Affairs and Human Services units, and an Interagency Language Access Task Force can be activated if the needs of the affected populations exceed the capacity of the responding agency. NYCEM's Language Access Coordinator maintains a list of bilingual/multilingual staff and volunteers that can conduct emergency preparedness presentations in languages other than English and assist emergency operations when translation and interpretation services are needed. In addition, NYCEM contracts with language vendors for the provision of:

- Translations
- In-person interpretation
- Telephonic interpretation in over 100 languages
- Sign Language in-person interpretation
- American Sign Language Video Remote Interpretation (VRI)
- Communication Access Real-Time Captioning (CART)

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

As a coordinating agency, NYCEM works with lead agencies in each incident to make sure that multilingual signage is available. In addition, NYCEM'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 NYCEM -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.

In addition, NYCEM has been expanding the Notify NYC program with pre-translated emergency alerts in compliance with Local Law 31.

NYC Emergency Management staff work together to review all documents for consistency, accuracy, and to guarantee the information includes common, everyday words whenever possible. All outreach materials, such as the Ready New York guides, go through several levels of review 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.

V. Training

In 2016, NYC Emergency Management launched an updated mandatory language access online training that employees can take at their desks. The training describes NYCEM's language access policies and procedures for each unit, and the Citywide Interagency Language Access Protocol. This training was updated again in March, 2018 to include Local Law 30 and Local Law 31.

Members of NYCEM's Language Access cabinet train response staff in the use of the protocol and how to access translation and interpretation contracts annually. External Affairs staff, responsible for language access during emergencies, is continuously trained on language access policies during External Affairs meetings that occur every three weeks.

NYCEM also conducts Cultural Awareness training for its staff, volunteers, City agency and community partners. The training was launched in 2016 for emergency management professionals to increase workplace effectiveness by increasing levels of cultural competency. The training guides participants to challenge biases and assumptions through self-reflection,

apply cultural awareness to NYCEM practices, identify culturally appropriate vocabulary, and acquire strategies to use in cross-cultural situations.

NYCEM's Training and Exercise division tracks staff who has taken the online language access training and the classroom Cultural Awareness training, and provides a report to NYCEM's language access cabinet annually.

VI. 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. Ready New York conducts 750 – 1,000 emergency preparedness events annually; roughly, a quarter of those events are for people with limited English proficiency and immigrant communities. These events are conducted either by staff or volunteers who speak the language of the community or with a professional interpreter. 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're received by Ready New York staff.

During emergencies, NYCEM works with the incident lead agency and NYCEM GIS unit to get accurate information about language access needs in the field. NYCEM does not collect any personal information of people requesting language access services. NYCEM maintains situational awareness of language needs that arise in the field and coordinates with responsible service agencies to meet those needs. In addition, after every incident, NYCEM 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 distributed to NYCEM staff and other City agencies involved in responding to the incident. The after action report contains recommendations and corrective actions for each incident. NYCEM 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, or the Interagency Language Access Task Force, if activated, to keep records of language access services provided during each incident.

VII. Resource Analysis and Planning

As described above, NYCEM maintains contracts with various language vendors and leverages its staff and volunteers to provide language access services when appropriate. NYCEM follows

the Interagency Citywide Language Access Protocol to coordinate language access operations during emergencies that require interagency coordination.

VIII. Outreach and Public Awareness of Language Access Services

As NYCEM is not a social service agency, it does not provide direct language assistance services. NYCEM's emergency preparedness guides and materials are available in 12 languages in addition to English on NYCEM's website and are also accessible through 311. These guides and materials are distributed through NYCEM's programs described in this plan, and outreach events across the five boroughs. NYCEM has a dedicated Cross-Cultural Outreach Coordinator who works closely with immigrant communities in New York City. The Cross-Cultural Outreach Coordinator schedules and conducts emergency preparedness events for people with limited English proficiency and distributes translated material in these communities.

IX. Language Access Complaints

Language access complaints can be filed by emailing languageaccess@oem.nyc.gov or calling 311. Complaints are monitored by NYCEM's language access cabinet and as with any other correspondence, members of NYCEM's language access cabinet respond to complaints within 14 calendar days of receipt.

X. Implementation Plan Logistics

NYCEM does not issue any licenses, permits or registrations and does not provide any direct social services. As a coordinating agency for the City of New York, NYCEM staff has limited engagement with the public, which is primarily through NYCEM's emergency preparedness programs. Ready New York guides are already translated into 12 languages in addition to English. NYCEM signage kits contain multilingual posters informing New Yorkers that they can request free interpretation. The majority of all other signage and Notify NYC alerts are also pre-translated. As such, NYCEM is already in compliance with Local Law 30.

During time of emergency, the City will set up a Language Access Task Force responsible for helping direct and support language access services across the city. This Task Force has the responsibility to ensure that language access protocols are followed. NYCEM works directly

with the Task Force leads and supports language access operations through the City's Emergency Operations Center.

The NYCEM 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.

FDNY LANGUAGE ACCESS IMPLEMENTATION PLAN

Name and title of Language Access Coordinator: Steven Ertrachter, Executive Director of Licensing.

I. 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.

The FDNY performed 225,025 Bureau of Fire Prevention inspections for fiscal year 2017 (July 1st, 2016-June 30th, 2017).

The fire operations field activities are performed by the uniformed personnel and are called "risk-based" and "mandatory" inspections (formerly AFID). There were 43,619 risk-based inspections and 60,795 mandatory inspections (104,414 inspections in total) performed during the 2017 fiscal year.

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.

II. AGENCY LANGUAGE ACCESS POLICY AND GOALS

FDNY's Bureau of Fire Prevention certifies individuals and inspects various locations 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 face hazards on a daily basis.

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 goal is to continue providing interpretation services to all customers who do not speak fluent English through the Language Line phone interpretation services. Important forms and pamphlets containing information are translated into the Local Law 30 required languages. 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.

III. 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 LEP PERSONS IN THE ELIGIBLE SERVICE POPULATION

FACTOR 2

THE FREQUENCY WITH WHICH LEP INDIVIDUALS COME INTO CONTACT WITH THE AGENCY

FACTOR 3

THE IMPORTANCE OF THE BENEFIT, SERVICE, INFORMATION, OR ENCOUNTER TO THE LIMITED ENGLISH PROFICIENT PERSON

FACTOR 4

THE RESOURCES AVAILABLE TO THE AGENCY AND THE COST OF PROVIDING VARIOUS TYPES OF LANGUAGE SERVICES.

PROVIDERS MUST ASSESS THE:

- (1) LEP demographic to whom services are provided;
- (2) Frequency of contact with LEP persons, the nature and importance of the services provided, and the resources available to the service provider.

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.

23% of the New York City's population identify themselves as LEP; therefore, we can extrapolate that 23% of our fire and EMS responses are to LEP persons. 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 uses the Language Line most frequently for Spanish, Chinese and Russian.

FACTOR 2: THE FREQUENCY WITH WHICH LIMITED ENGLISH PROFICIENCY (LEP) INDIVIDUALS COME INTO CONTACT WITH THE AGENCY

In 2017, FDNY Fire Safety Education staff and field personnel conducted 4,068 events in:

- Community centers;
- Senior center facilities;
- Pre-school, elementary and high schools;
- Firehouses;
- Other places of assembly.

The total audience for their events was 656,960 people. Of that total, 852 elementary schools and over 198,890 children ages 5 to 11 were reached. 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.

Language	Calls	Minutes
SPANISH	1993	10300.8
RUSSIAN	677	4314.7
MANDARIN	557	3736.3
BENGALI	311	1802.4
CANTONESE	243	1574.3
KOREAN	156	974.9
HAITIAN CREOLE	146	890.8
ARABIC	120	776.5
FRENCH	98	686.1
POLISH	91	601.4

Based on that information, the FDNY brings language-appropriate materials. Applying the 23% analysis of LEP persons in the NYC means that 151,000 persons to which we made presentations are LEP. The majority of our fire safety events require some translated materials. Fire safety educators bring English and other popular language materials to all of our 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.

4,392 calls were placed to Language Line during 2017 calendar year for all FDNY accounts (Intergovernmental Affairs, On Line Medical Control, Fire Prevention-Inspections, Fire Prevention-Customer Service, Fire Operations, 9-1-1 New York City Fire Department) with average 6 to 7 minutes spend per call.

FACTOR 3: THE IMPORTANCE OF THE BENEFIT, SERVICE, INFORMATION, OR ENCOUNTER TO THE LIMITED ENGLISH PROFICIENT (LEP) PERSON

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. In the calendar year 2017, BFP inspectors conducted more than 225,000 inspections.

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 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.

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. The individuals may need to pay the

5/17/2018

required fees at the cashier windows at this location. Several Cashiers' Office employees speak Spanish and other languages.

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 1st 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.

IV. 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 has hired a vendor that has a city-wide contract 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 recommend New York City residents and visitors follow New York City Emergency Management Department guidelines. However, in general, we identify the languages and encourage agencies participating in service centers and other operations to send staff with the same language set.
- For extended operations, events that affect multiple areas in the city, federally declared disasters, and notice events as needed, Mayor's Office of Immigrant Affairs (MOIA) may be recommended.
- The FDNY does have a Continuity of Operations (COOP) Plan; however the Language Access Implementation Plan (LAIP) has not been incorporated into the COOP. It will be incorporated into the COOP next year.

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 some of the FDNY staff are multilingual and often communicate LEP customers who require basic assistance.
- We continue to display 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 interpreters for rule hearings, upon request. The interpretations will be provided by the Language Line. However, the hearing notice is provided in English language. Even though rule hearing notices are in English, 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.



V. 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.

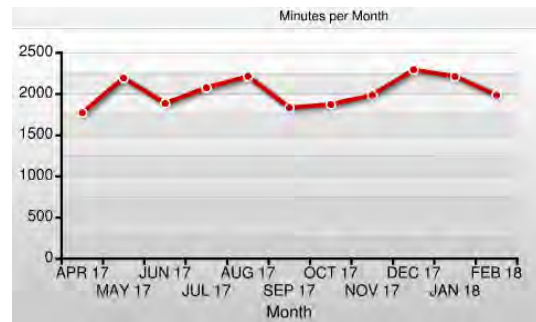
VI. RECORD KEEPING AND EVALUATION

A. RECORD KEEPING

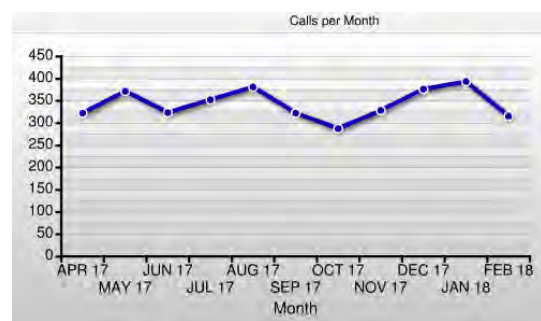
The FDNY tracks the use of all of our language access contracts, including the use of telephonic interpretation, on-site interpretation and written translation by program and location. The FDNY also gathers data on bilingual staff, whether they self-report as bilingual or are certified as bilingual through the selective certification process.

Language Line provides reports upon request summarizing the call duration, the language interpreted, as well as other metrics.

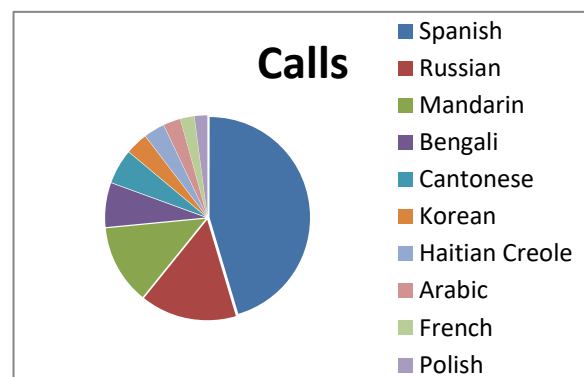
The first figure on the right is a record of calls per month to the Language Line associated with all FDNY accounts using Local Law 30 ten required languages (Intergovernmental Affairs, On Line Medical Control, Fire Prevention-Inspections, Fire Prevention-Customer Service, Fire Operations, and general 9-1-1 New York City Fire Department).



The second figure on the right is a record of minutes per month to the Language Line using FDNY associated accounts (Intergovernmental Affairs, On Line Medical Control, Fire Prevention-Inspections, Fire Prevention-Customer Service, Fire Operations, and general 9-1-1 New York City Fire Department) in required Local Law 30 languages.



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, Director of Public Certification and Education
- Jason Shelly, Director of Legislative and Intergovernmental Affairs, Government Affairs
- Katherine Raitz, Intergovernmental Liaison, Government Affairs
- Igor Lyutin, Administrative Staff Analyst

Since we are in the early stages of the implementation plan, the roles of each individual are still not clear; however, they will be determined shortly.

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?)

VII. RESOURCE ANALYSIS AND PLANNING

- The FDNY will continue the services with existing vendors.
- The FDNY will continue translating most of the frequently used public information flyers into the Local Law 30 ten required languages.
- All Fire Prevention staff that interacts with the public received or will receive customer service training.

- Since 2015, the FDNY Phoenix Society has organized Mandarin classes and started its most recent class in April, 2018. 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.
- 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.

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.

VIII. 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.

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.

IX. LANGUAGE ACCESS COMPLAINTS

All 311 complaints are routed through the Commissioner’s office and are directed to specific unit to address each issue. The FDNY was in contact with Christine Thompson who is a senior agency analyst at NYC 311.

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 2017.

Any issues that will be received will be evaluated on case by case bases with Language Access Committee before they are brought up to department heads.

X. 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	TBD
Provide agency-wide customer service training	Training new and non-new inspectors and non-inspectors-annually. Approximately 600 people.	Ronald Riccitelli (Bureau of Fire Prevention, Training)	Being implemented and conducted already
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

May 1, 2018

Language Access Coordinator:
Zodet Negrón
Director of Communications

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I. Agency 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 36,000 designated buildings and sites in New York City, most of which are located in 141 historic districts and historic district extensions in all five boroughs. The total number of protected sites also includes 1,410 individual landmarks, 120 interior landmarks, and 10 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.

II. 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. This is where public hearings and meetings are held, and where applicants drop off or pick up applications and permits. Preservation staff also meets with applicants at LPC's offices.

Currently, there are three main staff members who serve as the front line with the public: the Receptionist, the External Affairs Officer, and the Director of Intergovernmental and Community Affairs.

- The Receptionist is the first point of contact for visitors. The majority of visitors have pre-arranged meetings with LPC staff or are expeditors dropping off or picking up applications and permits.
- The External Affairs 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 receives 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 will be responsible for overseeing the implementation of the plan and revising it accordingly.

IV. 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.

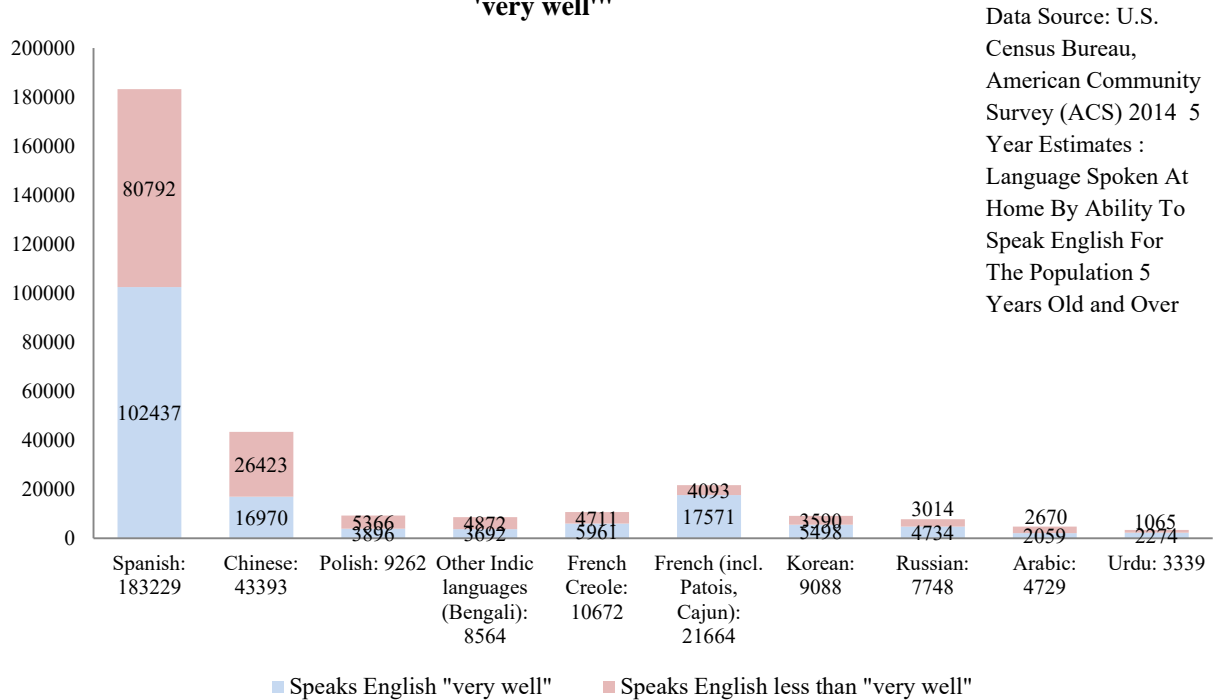
According to data provided by the Mayor's Office of Operations and the Mayor's Office of Immigrant Affairs (MOIA) from the U.S. Census American Community Survey and the Department of Education, the top 10 languages spoken by LEPs in New York are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, 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 141 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.

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. See charts above. See chart below.

Top 10 Language Groups with Largest Population that Speaks English "less than 'very well'"



Factor 2: Frequency of Contact with Agency

There are more than 36,000 designated buildings and sites in New York City, most of which are located in 141 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 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 more than 13,000 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:

Landmarking 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 is working to secure contracts with vendors to translate its forms and any other future documents on an as needed basis, and for in-person and telephonic interpretation needs.

V. Provision of Language Access Services

The Landmarks Preservation Commission (LPC) provides and will continue to provide language access services to LEP persons who require assistance.

- LPC will translate the agency's most commonly distributed documents into the 10 designated citywide languages.
- LPC will notify LEP-identified individuals that interpretation and translation services are available to them at no cost via signage and other forms of communication including but not limited to letters and notices.
- LPC will also provide telephonic interpretation in at least 100 languages, including the designated citywide languages.
- The Commission's Director of Communications will serve as the Language Access Coordinator. This person will be responsible for coordinating any contracts for translation, interpretation, and signage with the LPC Executive Director and Director of Administration.

VI. Service Provision Plan

LPC is prepared to provide translation or interpretation on an as-needed basis.

- In-Person Interpretation: LPC will use agency contracted services to provide in-person interpretation on an as-needed basis. The agency is working to secure a contract with a vendor.

- Telephonic Interpretation: LPC is looking to secure a contract with a vendor, for all telephone-based interpretation services by the end of FY18.
- Translation of Written Materials: LPC will use agency contracted services to translate its application forms, which include the Application Form for a Work Permit, the Expedited Certificate of No Effect Application and the FasTrack Form into all 10 designated citywide languages. The agency will also translate the Historic Preservation Grant Program application for Homeowners and Non-Profits, as well as the Requests for Evaluation forms for Individual Landmarks and Historic Districts.

Additionally, notices for public hearings/meetings and correspondence sent to property owners of potential landmarks under consideration will include a tagline regarding the availability of interpretation services in all 10 languages. LPC is in the process of securing an outside vendor to translate these documents.

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.

LPC will contract with an outside vendor for any translations deemed necessary. The agency will utilize bilingual staff and seek assistance from MOIA and its citywide Volunteer Language Bank to supplement contracted services. They will be used to review translated documents.

- Signage: LPC has multilingual signage posted near the reception desk 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.
- Public Hearings: LPC public hearing and meeting notices will include language indicating that any person who requires an interpreter to attend or participate, can contact the agency for assistance. This will include a tagline translated into the 10 designated citywide languages.
- Website: LPC has Google Translate built into the website, which can translate the web content into the 10 designated citywide languages. LPC will add information on how to use the Google Translate feature. There are currently no plans for full-scale website translation since most of the content can be translated using this feature.
- Plain Language: LPC will use plain language to the extent that its use does not interfere with any technical language essential to LPC business. The agency is reviewing its most commonly distributed documents, as well as its website. The Director of Communications, who is tasked with ensuring all communications of agency initiatives and mission are clear and consistent, will receive plain language training and develop plain language standards for staff.
- Emergency preparedness and response. The agency will post notifications to the website that can be translated via the translate feature on the site in the event of an emergency. LPC does not provide emergency services so notifications would be limited to announcing agency hours and postponements.

VII. Training

LPC's commitment to provide meaningful access to limited English proficient citizens requires a skilled and informed staff.

- 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.
- 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.

VIII. Record Keeping and Evaluation

LPC will conduct an annual review of its LAIP program based on systematic feedback from staff. The LAIP is a fluid document and will be updated as the need arises. LPC will review our language access policy at least once a year.

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; a logbook is kept with the External Affairs Coordinator.

IX. Resource Analysis and Planning

LPC will use agency contracted services to provide language services on an as-needed basis. The agency is working to secure contracts for telephonic and in-person interpretation needs. LPC is also securing a contract to translate its forms and any other future 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.

X. Outreach and Public Awareness of Language Access Services

Reaching out to homeowners is an integral part of the landmarks process. When LPC sends correspondence to a homeowner notifying them of the agency's interest in their property, the letter will 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 notice will include a tagline regarding the availability of interpretation services translated into all 10 languages.

LPC will post information on the website and signage at the front desk notifying customers of language access by the end of FY18.

XI. Language Access Complaints

LPC outreach and signage regarding the translation and interpretation services will provide information on how to file a complaint regarding the agency’s language access. A web form for language access complaints will be developed and posted on the agency website by the end of FY18. The electronic or e-form can be translated into all 10 designated citywide languages via the translate tool on the website. The agency will log these complaints and respond in a timely fashion, making any necessary changes to the plan. Language access complaints can also be made through 311. 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 will serve as the Language Access Coordinator. This person will be responsible for coordinating any contracts for translation, interpretation, and signage with the LPC Executive Director and Director of Administration. The External Affairs Officer will work with the Director of Communications to fully maintain and update the tracking of the plan needs and complaints.

The following parameters will be in place by the end of 2018:

Language access goal	Milestones	Responsible staff	Deadline
Secure contracts with interpretation and translation service vendors	Sign contracts	Director of Administration	June 30, 2018
Create logs for tracking and annual review form for feedback from staff	Work with External Affairs to create Excel spreadsheet	Director of Communications	June 30, 2018
Create tagline for insert	Draft language for tagline Translate tagline Insert into letter and agenda notice template	Director of Communications Outreach Coordinator	July 31, 2018
Post new notice to public regarding availability of language services	Print in color, laminate and post at reception desk, as well as on website	Director of Administration Director of Communications	July 31, 2018

Create complaint form portal on the website	Draft page Work with DoITT to implement	Director of Communications	August 31, 2018
Staff training	Develop Training Schedule Training Distribute Language Identification Cards to all staff	Director of Communications Director of Administration	September 30, 2018
Translate Forms and make them available to the public	Send to Vendor for Translation	Director of Administration Director of Communications	September 30, 2018



The New York City Law Department LANGUAGE ACCESS AND IMPLEMENTATION PLAN

(Revised 2018)

Language Access Coordinator
Sosimo Fabian, J.D., Ph.D.
Chief Diversity & EEO Officer
Tel. No.: 212-356-3195
Email: sfabian@law.nyc.gov

I. 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 for, 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.

II. 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.

III. 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 of the City's children, and protects the general public. The Division 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 file for child support from parents who live outside the state and the country. The Division also investigates and prosecutes juvenile delinquency cases.

In 2016 the Family Court Division requested interpretive services 553 times and in 2017 it requested interpretive services 470 times. In that two year span, the Family Court Division requested interpretive services 1023 times. The five most common languages requested were Spanish, Chinese-Mandarin, Bengali, Russian and Arabic. See Exhibit B. Notably, while these are the most popular languages others can be provided.

IV. Provision of Language Access Services:

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.

REQUESTING "LIVE" INTERPRETER SERVICES

When a "live" interpreter is required, the attorney handling the matter must send an email to "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" 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") or by phone (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" 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. Before granting approval, Division Chiefs or their designee will review source documents to ensure language to be translated is as plain and clear as possible. Once approved, the request is forwarded via email to "StenosNYC@law.nyc.gov".

When emailing "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 service 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.

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. Staff will engage interactively where the need arises to provide the language service needed to best serve the public.

PLAIN LANGUAGE REVIEW FOR TRANSLATED DOCUMENTS

All source language to be used for multi-language signage purposes and/or for the agency's most commonly distributed documents listed in Exhibit C will be reviewed prior to translation by Division Chiefs to ensure the language is as plain and clear as possible.

EMERGENCY PREPAREDNESS AND RESPONSE

In the event the agency needs to provide critical information to the public in the event of an emergency, the message will be made available on the NYC Law Department's internet site. The website currently offers translation in 104 languages.

V. Training

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.

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.

VI. 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.

VII. Resource Analysis and Planning:

The agency currently has a contract for interpretive services which fully permits it to comply with Local Law 30.

VIII. 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 these services are mentioned as part of their interaction with members of the public.

IX. 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.

X. Implementation Plan Logistics

The Language Access Coordinator is Sosimo Fabian, Tel. No. 212-356-3195, email: sfabian@law.nyc.

This Language Access Plan will be implemented by 7/1/2018. It is worth noting that the Law Department has been historically in compliance with these requirements.

By July 1, 2018, the Language Access Coordinator will make sure 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.

EXHIBIT A

Appendix B - List of Languages						
RFP Title: Language Services, Citywide / PIN # 85712P0001						
TIER 1 - Executive Order 120 Languages*				6		
1	CHINESE (Cantonese/ Mandarin/ Other)					
2	FRENCH CREOLE					
3	ITALIAN					
4	KOREAN					
5	RUSSIAN					
6	SPANISH					
* Tier 1 Languages - are not limited to languages listed in Executive Order 120. Additional languages may be added determined by each Agency's clientele demographics and will be listed in a Task Order issued by that Agency.						
TIER 2 - Common Languages				(74) 72		
1	AFGHANI (DARI)	28	HEBREW	64	ROMANIAN	
2	AFRIKAANS	29	HINDI	65	SAMOAN	
3	ALBANIAN (GHEG & TOSK)	30	HINDUSTANI	66	SANSKRIT	
4	ARABIC (ALL DIALECTS)	31	HUNGARIAN	67	SERBIAN	
5	ARMENIAN	32	ICELANDIC	68	SHANGHAI (CHINESE)	
6	AZERBAIDJANI	33	INDONESIAN	69	SLOVAK	
7	BENALI	34	JAPANESE	70	SLOVENE	
8	BOSNIAN	35	KHMER	71	SOMALI	
9	BULGARIAN	36	KURDISH	72	SWAHILI	
10	BELORUSSIAN	37	LAOTIAN	73	SWEDISH	
11	BURMESE	38	LATIN	74	TAIWANESE	
12	CATALÁN	39	LATVIAN		75	TAMIL (SRI LANKAN & INDIAN)
13	CROATIAN	40	LITHUANIAN		76	THAI
14	CZECH	41	MACEDONIAN		77	TIBETAN
15	DANISH	42	MALAY		78	TURKISH
16	DUTCH	43	MALAYALAN		79	UKRANIAN
17	ESTONIAN	44	MONGOLIAN		80	URDU
18	ETHIOPIAN	45	MYANMAR		81	UZBEK
19	FIJIAN	46	NAVAJO		82	VIETNAMESE
20	FILIPINO	47	NEPALI		83	WELSH
21	FINNISH	48	NORWEGIAN		84	YIDDISH
22	FLEMISH	49	PASHTO			
23	FRENCH	50	PERSIAN (FARSI)			
24	GEORGIAN	51	POLISH			
25	GERMAN	52	PORTUGUESE			
26	GREEK	53	PUNJABI			
27	HAITIAN CREOLE					
PAGE 1 of 2						

EXHIBIT B

Count of ID Row Labels	Column Labels		
	2017	2016	Grand Total
AL	1		1
Arabic-Egyptian	1		1
FC	470	553	1023
	2		2
Albanian	3		3
American Sign Language		1	1
Arabic	5	13	18
Arabic-Egyptian	1		1
Arabic-Yemen	6		6
Bangla		3	3
Bengali	22	14	36
Chinese-Cantonese	8	7	15
Chinese-Cantonese and Chinese-Mandarin	1		1
Chinese-Cantonese or Chinese-Mandarin		1	1
Chinese-Fujianese		1	1
Chinese-Fukienese	2	1	3
Chinese-Fuzhounese	1		1
Chinese-Mandarin	41	67	108
Chinese-Wen Zhou	1		1
Creole	1	3	4
Farsi		1	1
French	1	4	5
Fula / Fulani		2	2
Fulani	2	3	5
Georgian		1	1
Greek		1	1
Haitian-Creole	4	3	7
Hassidic-Yiddish		1	1
Hindi	1	2	3
Indonesian		1	1
Italian		6	6
Japanese	1		1
Korean	4	4	8
Mandingo	1		1
More		1	1
More (African language of Burkina Faso)		1	1
Nepali		2	2
Polish		5	5
Portuguese	1	1	2
Punjabi		3	3
Russian	2	17	19
Russian-Tajik	1		1
Spanish	349	372	721

Tagalog		1	1
Tibetan	2	1	3
Urdu	5	5	10
Urdu / Hindi / Punjabi	1		1
Uzbek		2	2
Vietnamese		1	1
Yemeni-Arabic	1		1
Yoruba		1	1
GL	3	4	7
American Sign Language	2	1	3
American Sign Language (Tactile)	1		1
Spanish		3	3
LE		1	1
Spanish		1	1
SF	1	2	3
Japanese		1	1
Spanish	1	1	2
TT	25	33	58
Albanian-Montenegrin		1	1
Chinese-Cantonese	1	4	5
Chinese-Mandarin	5	6	11
Chinese-Toisanese	1		1
Haitian-Creole	1		1
Korean		3	3
Polish	4		4
Russian	4	1	5
Spanish	9	17	26
Spanish (Court Certified)		1	1
Grand Total	500	593	1093

EXHIBIT C

Law Department Language Access Plan – Exhibit C

The following Family Court Division documents will be translated into Spanish:

Juvenile prosecutions:

Rescheduling Notice
Address Verification Form
Notice of Declination to Prosecute
Notice of Intent to File a Petition
Initial Witness Contact Letter (including a request for phone number) Witness Scheduling Appointment Letter
Victim Impact Statement
HIPAA Release Form
Letter to Witness Explaining HIPAA Release and Request for Signature
"Final Notice" Letter
Letter to Explain and Accompany TOPs
Pre-filing Subpoena to Appear
Letter to Explain and Accompany Pre-filing Subpoena to Appear
Safe Horizon Form

Interstate Child Support Unit:

Registration Petition instructions, Petitioner's Agreement, and forms
Modification Petition instructions, Petitioner's Agreement, and forms
Petition to Establish Support or to Establish Paternity and Support instructions, Petitioner's Agreement, and forms
"Please fill out" letter
Order entered
information letter
Additional information
letter Missing papers
letter
Initial status letter – Petition forwarded to Responding Jurisdiction letter
Petitioner Status update letter
Petitioner call inquiry letter



NYPD

New York City Police Department

JAMES P. O'NEILL

Police Commissioner



NYPD LANGUAGE ACCESS PLAN

July 2018

NYPD LANGUAGE ACCESS PLAN
Revised 2018

NYPD LANGUAGE ACCESS PLAN FOR LIMITED ENGLISH PROFICIENT (LEP)
PERSONS

I. 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;
- 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 or certificates of relief;
- Providing safety and security services for public schools, public housing developments, and mass transit facilities, and
- Providing counterterrorism protection for the City.

The Department's direct services may be provided in the field or at a point of service 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 interpretation services as necessary when working with a LEP individual. Typically, officers utilize bilingual members of the Department, or Language Line for interpretation services.

The decision of whether to use the Language Line or a certified interpreter on the scene is based on the totality of the circumstances (e.g., language required, availability of live interpreters, exigency of the situation, etc.). In many cases, other than for ongoing investigations and document translation, an efficient method of obtaining interpretation services is through the Language Line service. This option is readily accessible now that all officers have been equipped with a Department-issued smartphone capable of accessing Language Line in the field.

II. Goal of the NYPD's Language Access Plan

The New York City Police Department recognizes the importance of effective and accurate communication between its employees and the community they serve. Consistent with Title VI of the Civil Rights Act of 1964, the Omnibus Crime Control and Safe Streets Act of 1968, and Mayor's Executive Order 120 of July 22, 2008, it is the policy of the New York City Police Department to take reasonable steps to provide timely and meaningful access for LEP¹ persons 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 when necessary or whenever a LEP person requests language assistance services. It is the policy of this Department to inform members of the public that language assistance services are available free of charge to LEP persons. The Department provides these services to them as part of the Department's community policing and enforcement efforts.

The Commanding Officer, Office of Management Analysis and Planning, is John G. Cappellmann. He has been designated the Department's Language Access Coordinator (LAC) by the Police Commissioner. As the LAC, he will supervise the Department's language access plan and institute several measures to monitor the success of the plan. Additionally, the language access plan will be reviewed and updated as necessary.

III. LEP Population Assessment

The New York City Police Department 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 of 2017, the Mayor's Office of Immigrant Affairs and the Mayor's Office of Operations identified ten languages as the ten designated citywide LEP languages: Spanish, Chinese, Russian, Korean, Bengali, Haitian

¹ Limited English Proficient (LEP) persons refers to those individuals whose primary language is not English and who are unable to effectively read, write, speak or understand English.

Creole, Polish, Arabic, Urdu and French. The Department provides its services for the entire City of New York; therefore, the Department will use the ten languages that have been designated as the baseline languages for its language access policy and plan. Essential public documents will be translated into these languages as practicable. Furthermore, interpretation services will continue to be provided in every language as necessary via Language Line and the Language Initiative Program described in Section IV – Service Provision Plan.

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 2 – LEP data tailored specifically to the agency: The most accurate data regarding the LEP populations that the Department currently serves is Language Line usage, and 911 call records. Of the 8,845,843 calls the Department received via 911 in CY 2017, 273,028, or approximately 3%, required interpretation services. Additionally, 148,457, or 54%, of the “911” calls that required interpretation services were processed “in-house” by the Department’s Spanish speaking 911 call takers. In CY 2017, the Language Line processed 124,571 total calls requiring interpretations in 90 different languages. The top three requested languages required in CY 2017 were Spanish, Mandarin, and Russian. Of the foreign language speaking “911” calls received, Spanish represented the vast majority.

Factor 3 – Nature and Importance of Services: The Police Department provides a wide array of emergency services that involve life threatening situations. It is virtually impossible to compose a list of all situations the police encounter. However, many serious situations that the police must handle involve crime. Obtaining language interpretation services for crime victims is the most important language access service the Department provides to the public. There are many exigent circumstances, including determining if a crime has occurred, rendering/obtaining medical treatment, and apprehending perpetrators of crimes, when the Department may need to utilize bilingual community members to assist in providing immediate services to LEP individuals. Once the situation is stabilized, a certified interpreter may be obtained through the Language Initiative Program or Language Line.

Factor 4 – List of Resources Designated for Language Assistance Services:

- Smartphones assigned to all officers with the Language Line numbers programmed to provide access to language interpretation services in the field.
- Special dual handset telephones for accessing the interpretation services of Language Line are in every precinct, housing police service area, and transit district.
- The Language Initiative Program administered by the Chief of Personnel.

- Since September 28, 2009, the Department has posted multi-language signs to advise LEP individuals of the availability of free interpretation services. These signs are prominently displayed in all publicly accessible Department facilities.
- Starting in 2010, the Department began issuing primary language identifier activity log inserts to all members of the service. Each new recruit receives the insert during academy training. The insert is also available to all uniformed officers on Department-issued smartphones. These resources enable quick identification of 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. Additionally, the homepage can be accessed via an online translation tool that covers more than 100 languages.
- In CY2017, the Police Department spent a total of \$71,645 on foreign language certification testing as part of the Language Initiative Program.

IV. Service Provision Plan

A. Language Line Services

The New York City Police Department provides interpretation services over the phone, in the field, and at police facilities. The Department will continue to utilize its contract for Language Line Services. The Communications Division administers Language Line operations for the Police Department. Language Line Services is a private vendor that provides translation and telephonic interpretation services in over 180 languages; however, the Department currently only utilizes Language Line for telephonic interpretation. Documents are normally translated by Department employees that have been certified through the Language Initiative Program.

In addition to Language Line services, the Communications Division has the capacity to provide significant in-house interpretation services to 911 callers. Given a large portion of the LEP population in New York is Spanish speaking, the 911 staff is comprised of a large number of bi-lingual Spanish-speaking operators.

B. Language Initiative Program

The Chief of Personnel will continue to administer the Language Initiative Program. The New York City Police Department established the Language Initiative Program in 2002, in order to create a corps of interpreters who could be called upon in particularly complex cases, and to increase the pool of personnel capable of interpreting uncommon foreign languages for counterterrorism, investigative, or other police purposes. Under this program, members of the Department, both uniformed (police officers) and civilian, volunteer to use their language skills to improve the efficiency of police operations.

An officer's language skills are entered on his/her personnel record which is available to Operations Unit personnel and can be accessed at any time. The majority of requests for interpreters within the Department are made via the Operations Unit; however, the Personnel Bureau and the Intelligence Bureau also have the capability to process requests for interpreters. As of February 2018, the Language Initiative Program has 2,452 certified interpreters, and is capable of providing interpretation services in over 85 different languages (including American Sign Language).

C. Use of Non-Certified Interpreters

Nearly 35% of Department employees indicate some level of proficiency in a language other than English. Approximately 21% of those employees indicate proficiency in Spanish. The Department encourages employees who are not certified, but nonetheless possess language skills, to use their ability to speak a foreign language during the course of their work. The use of bilingual employees to provide police services in a foreign language allows the Department to provide the public with a more timely and personalized response while simultaneously reducing inconvenience to LEP persons.

Generally, a non-certified employee may interpret if he or she reasonably believes that his or her level of language proficiency is sufficient to accurately interpret, given the totality of the circumstances surrounding 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 service of the Language Line or Language Initiative Program should be used.

Some factors that non-certified employees should consider when determining whether they should interpret include whether or not the LEP person is in police custody, the potential severity of the outcome 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/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. In addition, it may also be appropriate to use a bilingual member of the public to interpret during a non-emergency encounter if the use of such an interpreter will expedite the delivery of police services without adversely impacting the quality of the services provided. When dealing with a LEP individual and a bilingual member of the public is readily available and willing to provide interpretation services, the employee will consider four factors to determine if the use of the non-employee interpreter is helpful:

- 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 the above 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 avoid using bystanders and family members to interpret in order to preserve privacy and minimize the risk of a faulty interpretation, often due to fear of arrest of a family member or other personal biases. They may be temporarily used for interpretation in life-threatening situations when there is no feasible alternative. However, 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 misinterpretation and gives him or her 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 victim believes the offender may overhear the statement.

As possible victims or witnesses to an incident, a child should be interviewed; however, absent exigent circumstances, 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 a child to understand, let alone translate into another language. Interviewees are not likely to be forthcoming if a child is used to interpret and will be especially hesitant to reveal details of a sexual assault to a police officer through a child.

Regarding interpretation/translation duties for investigative purposes (e.g., custodial interrogations), the Police Department prefers the use of certified interpreters through the Language Initiative Program.

D. Domestic Violence Initiative

In 2015, the Department launched a pilot program in three precincts to enhance language assistance services to LEP individuals involved in domestic violence incidents. Under the pilot's protocols, officers handling family-related calls for service make a determination whether language assistance is needed or requested by one of the parties. If so, the officer will use either a certified member of service or a Language Line interpreter absent exigent circumstances. In addition, officers will document whether such services were needed, and, if so, whether and how they were supplied.

The initiative was expanded in 2016 to additional precincts and was expanded to all precincts in November 2017.

E. Selective Certification Program

The Chief of Personnel will continue to administer the Selective Certification Program which is in effect during the recruit selection process. Under this program, police applicants that are able to speak a language that is in demand by the Police Department receive special consideration for their abilities during the hiring process.

F. Evaluation of Language Access Needs of Service Population

The Mayor's Office of Operations and Office of Immigrant Affairs with the Department of City Planning designated ten languages as 'the top LEP' languages for New York City. These languages -- Spanish, Chinese, Russian, Korean, Bengali, Haitian Creole, Polish, Arabic, Urdu and French are the baseline languages for 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.

G. Primary Language Identifiers

The Mayor's Office created signs to inform the public of the availability of cost-free interpretation services. The signs are written in twenty-two different foreign languages. These signs are posted in publicly accessible areas of Police Department point of service facilities (precincts, housing police service areas and transit districts). The signs are designed in a format that enables the LEP person to point to the language he or she speaks so the employee can inform the Language Line interpreter what language is needed. Other than the reception area, most Police Department facilities are not publicly accessible, and therefore directional signage is not required.

Furthermore, all uniformed members of the service are issued a one-page activity log insert--which is now available on officers' smartphones--that is designed in a format that enables the LEP person to point to the language he or she speaks. This permits officers to quickly identify an individual's primary language.

H. Translation of Written Material

Most Department forms are prepared exclusively by a Department employee and therefore, do not require translation. Of the Department forms that contain sections for the member of the public to complete, the vast majority must be referenced later by other parties (e.g., clerical staff, investigators, court staff, etc.) making completion of the form in the LEP person's primary language impractical. Department forms can be completed by employees using information obtained through an interpreter, when necessary. In addition, officers taking Domestic Incident Reports allow victims to complete page 2 of the document in his/her primary/preferred language.

The Office of Management Analysis and Planning (OMAP) continues to examine other types of Department forms that are regularly completed by members of the public and evaluating the practicability of translating these documents. In addition, the Department has created a new mechanism to translate written materials that are distributed to the public (e.g., pamphlet, flyer, notice, poster, etc.). The written material must 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 members of the public to understand. For instances where no Language Initiative participant is available (e.g., obscure language, availability, etc.), the Department utilizes the services of an outside vendor, "Accurate Communications."

I. Community Outreach

The NYPD's Community Affairs Bureau has a specific subunit dedicated to immigrant outreach. On average, the Immigrant Outreach Unit conducts 15 to 20 presentations, lessons, and lectures in a classroom-type setting per month. This translates to over 3,000 people instructed by the Immigrant Outreach Unit each year. The Unit hosts approximately 24 large events each year in various immigrant communities with approximately 400 to 1,000 people attending each event. Immigrant Outreach personnel make presentations on Police Department policies, programs, and services affecting new immigrant communities. In addition, liaisons are able to speak different languages which helps to better communicate with various immigrant communities. Since 2008, the Unit has organized the NYPD Police Commissioner's Youth Soccer & Cricket Leagues for youths between the ages of 14-19, which has given thousands of immigrant youth the opportunity to participate in a positive program bringing the police and community closer together. The Immigrant Outreach Unit liaisons work to build and maintain relationships with community leaders and organizations in new immigrant communities. Additionally, the Unit coordinates with other Police Department bureaus and City agencies to address the needs and concerns of the community. Furthermore, the Unit is actively in the process of having certified, via the Language Initiative Program, all of its members who identify proficiency in a foreign language.

J. 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. In addition, the Department's website can be accessed via an online translation tool in over 100 languages.

V. 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 interpretation 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. Roll-calls for patrol officers assigned to precinct, police service areas and transit districts occur at the beginning of each shift which is 3 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 on how to identify an individual's primary language, to use the Department smartphone and dual hand-set telephone, to use telephonic interpreters, and to properly use certified and non-certified interpreters. In-service training sessions specific to elements of the Language Access Plan are conducted regularly.

Furthermore, public facing civilian employees also receive training regarding the Department's Language Access Plan during their initial orientation training, and semi-annually through the command level training program.

VI. Record Keeping and Evaluation

Records of the language services provided by the Police Department will be obtained through billing statements received by Language Line services. Furthermore, the Chief of Personnel maintains records regarding the use of police personnel for interpretation or translation services. Both these sources of data are monitored and reviewed periodically, in addition to other official Department records, by the Department's Language Access Coordinator.

VII. 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 interpretation services in over 180 languages. Department point of service facilities (e.g., precincts, housing police service areas and transit districts, etc.) are able to access the Language Line service using specially equipped dual handset 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 phone number. These smartphones provide all patrol personnel with the ability to acquire interpretation services in the field.

VIII. Outreach and Public Awareness of Language Access Services

As a supplement to the activity log inserts described in Section III, 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 will be distributed in 2018, and annually thereafter.

In addition, a poster entitled "Free Interpretation Service Available" is visibly displayed in the reception area of all precinct/transit district/police service area commands, ensuring crime victims and visitors to police facilities are made aware of language access services.

IX. Language Access Complaints

Public 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 interpretation/translation services to persons with limited English proficiency;

- Failure to provide a sign language interpreter/auxiliary aids and services to a hearing impaired person.

The Internal Affairs Bureau is the entity 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, or discipline.

In CY 2017, thirteen (13) language access complaints were received via 311.

X. Milestones

- **2019**
 - Test and certify all officers in the Immigrant Outreach Unit who identify proficiency in a foreign language.
- **2020**
 - Test and certify all 911 call-takers who identify proficiency in a foreign language.
- **2021**
 - Translate the NYPD “Crime Stoppers” website in the 10 designated LEP languages.

XI. Implementation Plan Logistics

The 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. For example, the Department currently administers a Language Initiative Program, a Selective Certification Program, Language Line, and Cultural Immersion training. Furthermore, the Police Department is fully accessible to LEP individuals for all purposes, including licenses, permits or registrations.



LANGUAGE ACCESS IMPLEMENTATION PLAN

May 1, 2018

Name and Title of Language Access Coordinator:

Marisa L. Senigo

Assistant Commissioner for Public Affairs and Communications

OATH LANGUAGE ACCESS PLAN

I. Agency Mission and Background

Background

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 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.

a. 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). In FY 2016, OATH received more than 820,000 summonses from City enforcement agencies.

b. The direct public services offered by OATH

Overview of the Direct Public Services Provided by OATH

The agency provides direct public services in its trials and hearings and in the operations of its Clerk's Office.

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 parties⁴⁴ 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.
- 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 summonses.
 - 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 wants to contest (fight) the charges contained in the summons but doesn't want to come to a hearing at OATH in person, most 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 translation 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 eight (8) languages. OATH also offers appeals online.
- Under LL 30, OATH will increase 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 will receive for adjudication nearly 1 million summonses in calendar year 2018 from City enforcement agencies. 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.
- In the first 6 months of operation, Help Center staff encountered 31,214 people at OATH Hearing locations throughout the five boroughs. Of those, it provided substantive assistance to 22,001 self-represented people who were trying to fight their City summons.

- ***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 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 information to the public 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.

II. OATH's Language Access Goals

a. 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.

Goals Already Achieved Prior to Local Law 30

OATH had already made significant progress towards its goal of providing language access services, as follows:

- OATH already had free professional language 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 that appropriate under the circumstances).
- OATH clerks have assisted in identifying and then assisting LEP persons using over the phone interpretation services since 2010.
- 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.
- 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.

Additional achievements include:

- Documents: OATH has translated key documents into the top eight (8) foreign languages. In 2018, in order to come into compliance with Local Law 30, OATH will have these available in the ten (10) languages mandated by the law.
- Clerks who receive calls from LEP respondents can use over-the phone interpretation to speak to the caller in their preferred language. This has been possible since 2010.
- 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.

- 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 re-written or revamped documents of key importance in plain language and then translated them into the top eight (8) languages which include Spanish, Arabic, Bengali, Chinese, French-Creole, Korean, Russian, and Urdu.
- OATH 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.
- 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 nine (8) foreign languages: Spanish, Arabic, Bengali, Chinese, French-Creole, Korean, Russian, and Urdu.

b. How OATH decides if it has successfully implemented its Language Access Plan.

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.

III. LEP Population Assessment

a. As mandated by LL30, OATH will use the top 10 LEP languages in its Language Access Plan.

OATH has previously used the top eight (8) languages in its plan.

The newly created Hearings Division has made all of its applications, forms and informational brochures available in the top 8 languages as reported by interpreter requests at the agency and from guidance and input from the Mayor's Office. They include: English, Spanish, Arabic, Bengali, Chinese, French-Creole, Korean, Russian and Urdu. The forms and brochures can be on the [OATH website](#).

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.

b. 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). Those four factors are:

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

Factor 2: The frequency with which LEP persons come in contact with the agency.

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).

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

The proportion of LEP persons in the service population and the frequency with which they come into contact with the agency.

OATH can estimate the proportion of LEP persons in the service population and the frequency with which LEP persons come into contact with OATH 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.

OATH can estimate how often LEP persons⁴⁵¹ come in 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.

A review of translation usage data for 2017 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.

The importance of the benefit, service, information, or encounter to the LEP person

OATH looks at the importance of its 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 eight (8) languages spoken by respondents at those tribunals.
 - OATH has made its website easily 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.

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 soon 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.
- OATH's Administrative Judicial Training Institute (AJI) provides training on cultural competency, diversity and cultural sensitivity.

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.

All four factors will be considered.

OATH will be taking the four U.S. DOJ factors into account on an ongoing basis, as it implements, revises and revamps its Language Access Plan.

IV. Provision of Language Access Services: Implementation Plan Logistics

a. What has already been achieved?

The key parts of the Language Access Plan that have already been implemented are:

- **Over the Phone Translation:** 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 eight (8) languages at OATH offices has already been placed on Powerpoint-type presentations. In 2018, in order to come into compliance with Local Law 30, OATH will have these available in the ten (10) languages mandated by the law.
- **Documents:** OATH has translated key documents into the top eight (8) foreign languages. In 2018, in order to come into compliance with Local Law 30, OATH will have these available in the ten (10) languages

mandated by the law.

- **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 translation service it has contracted with. The OATH website is completely translatable and plain-language notices on the homepage page and other pages during an emergency can be easily translated by users.
- **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.

b. What needs to be done in order to be in compliance with LL 30?

- **Signs:** Review and document all existing signs in all OATH offices and decide which signs should be translated and into what format (posted sign; PowerPoint or handout). *This will be completed by the deadline as mandated by the law. OATH will use its professional, third party vendor to complete the translations for its signs*
- **Document Translation:** All informational brochures at all OATH divisions must be translated into two additional languages: French and Polish. *This will be completed by the deadline as mandated by the law. OATH will use its professional, third party vendor to complete Desktop Publishing of the translations for its forms and brochures.*

a. Interpretation services

1. 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.

i. 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 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.

ii. 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.

b. Translation of Written Material

With new rules in affect and the formation of the “Hearings Division” new forms and brochures were created in 2017. OATH used Geneva Worldwide, Inc. to translate its informational brochures into the top eight (8) languages when it revamped all of its forms and brochures in 2016. OATH will continue to use a vendor to translate new signs, forms, brochures and other applicable documents into the two additional languages by the deadlines mandated by Local Law 30.

1. 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 will be 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 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 2017 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. Current documents will be translated into the two (2) additional languages of French and Polish, as mandated by LL30.
- **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. Some forms are filled in by OATH staff (such as Orders of Adjournment); and some forms are filled in by persons appearing at OATH (such as Notices of Appearance). OATH has translated all forms for its Hearings Division into the top eight (8) 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. All forms will be translated into the two (2) additional languages of French and Polish, as mandated by LL30.
- **Quality Assurance Check:** OATH will do 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.

2. 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.

3. 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 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.

c. Signage at Public Hearings Centers

OATH currently has 6 public locations across its divisions.

1. Public notices about OATH's free language assistance.

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.

2. Translation of directional signage in OATH offices

OATH has already translated signage into English and Spanish and will be doing a review of signage and translating directional signs. See Point V(b)(1) above.

d. 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.

e. 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 AC for Public Affairs & Communications and the Commissioner. The clerk's in our call centers always have the ability to get a translator on the line when a person calls that doesn't speak English.

Unfortunately, our over-the-phone translation 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 translators 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.

V. Training

a. 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.

b. Training on identifying a person's primary language: use of dual hand-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.

c. 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.

d. Tracking Training

All training conducted by OATH's Administrative Judicial Institute (AJI) is tracked and records are maintained. The AJI reports its initiatives and training numbers to Executive Staff.

VI. Record Keeping and Evaluation

a. 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.

b. 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.

c. 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.

VII. Resource Analysis and Planning

a. 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 possibly for staff training.

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.

b. 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.

VIII. Outreach and Public Awareness

a. 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 English and Spanish. When the event is in Flushing, Queens, the materials would be translated into Chinese.

b. Interpreters at Public Outreach Events

As stated above, OATH conducts many dozens of outreach events each year in communities around the City. 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.

IX. Language Access Complaints

a. 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 Assistant 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.

b. 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 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.

X. Implementation Plan

a. Persons at OATH involved in implementing the Language Access Plan.

OATH's Language Access Coordinator is Marisa Senigo, Assistant 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.

b. Implementation of plan for compliance with LL30

Language Access Goal	Milestones	Responsible Staff	Deadline
Translate all essential documents into final 2 languages- Polish and French	Gather essential documents and submit to vendor for desktop publishing (brochures) and document translation (forms)	Marisa Senigo, Assistant Commissioner for Public Affairs & Communications	July 1, 2018
Review Language Access Implementation Plan	Annually	Marisa Senigo, Assistant Commissioner for Public Affairs & Communications	February 2019

CONTACT US

Contact OATH's Language Access Coordinator:

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Language Access Implementation Plan

Mayor's Office to Combat Domestic Violence

April 2018

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I. Agency Mission and Background

Mission

The Mayor's Office to Combat Domestic Violence (OCDV), established in 2001, formulates policies and programs, and coordinates the citywide delivery of services for survivors of intimate partner violence, sex trafficking, and elder abuse. OCDV works with diverse communities and community leaders to increase awareness of domestic violence (DV). OCDV collaborates closely with government and nonprofit agencies that assist survivors, and operates the New York City Family Justice Centers (FJCs) in each borough. These co-located multidisciplinary centers provide vital social services, civil legal and criminal justice assistance for survivors of intimate partner violence, sex trafficking and elder abuse, and their children, in one location.

NYC Family Justice Centers, Community Outreach, and Policy and Training Institute

Family Justice Centers and Community Outreach

OCDV operates The New York City Family Justice Centers (FJCs), overseeing service provision and providing ongoing training and community outreach. OCDV's Outreach Team provides community education and works closely to engage community members in various outreach events and forums.

NYC Family Justice Centers

The FJCs, located in all five boroughs, provide comprehensive civil legal, counseling and supportive services for survivors of intimate partner violence, elder abuse and sex trafficking. Key City agencies, social and civil legal services providers, the Policy and Training Institute, and New York City Police Department (NYPD) and District Attorney's Offices are located onsite at the FJCs to make it easier for survivors to access free and confidential services. Services are available to victims and survivors of abuse, including speakers of languages other than English, people of all sexual orientations, gender identities and expressions, people of all income levels, and people of all immigration statuses.

Community Outreach

OCDV's Outreach Team consists of trained Community Liaisons who work closely with NYCHA communities that are part of the Mayor's Action Plan for Neighborhood Safety (MAP) and the FJCs to educate community members about OCDV's mission, the dynamics of domestic violence, the availability of services through the FJCs and the various training offerings OCDV provides. Through these outreach efforts, the Team seeks to reduce stigma, educate the community about the services available for survivors of domestic violence and help reduce barriers when reporting abuse or seeking services.

Policy and Training Institute

The Policy and Training Institute (the Institute) has two outward facing training arms: the Domestic Violence Training Team (the DV Training Team) and the NYC Healthy Relationship Training Academy (the Academy).

DV Training Team

The Training Team is comprised of trainers knowledgeable of topics related to domestic violence and intimate partner violence (IPV). The Team works with City agencies and community based organizations to identify training needs and provide a training menu ranging from introductory education to advanced topics.

NYC Healthy Relationship Training Academy

The Academy, established in 2005, provides educational and skills-building training workshops for youth, parents and caregivers, and organizations that provide services to young people about healthy relationships and teen dating violence.

II. Agency Language Access Policy and Goals

OCDV 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 services and programming at the FJCs, outreach efforts, the DV Training Team and the Academy, as well as external agency communications. 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. Signage informing LEP clients of the right to an interpreter and the right to file a complaint with a manager and/or via 311 are posted in conspicuous locations throughout FJC facilities. This signage, provided by the Mayor's Office of Immigrant Affairs (MOIA), provides information in New York City's top ten LEP languages – Spanish, Chinese, Russian, Haitian Creole, Bengali, Korean, Arabic, Urdu, French and Polish.

Accessibility of Interpretation

OCDV and FJC on-site partner agency 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. OCDV 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 or first language. For these reasons, interpretation is available to all LEP clients and community members engaging with OCDV staff, in any capacity, as well as with partner agency staff working at a FJC. This interpretation shall be available if the LEP or non-English primary language speaker desires, regardless of the LEP person's ability to otherwise generally communicate in English.

Use of Children, Friends, and Family as Interpreters

OCDV staff and FJC on-site partner agency staff members are strictly prohibited from using minor children to act as interpreters during any client or community member engagement, except in exigent circumstances. Additionally, OCDV staff and FJC on-site partner agency staff 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, the general policy against and potential complications or concerns arising from the use of adult children, relatives, or friends as interpreters. Additionally, it is communicated that some FJC on-site partner staff may not be able to maintain the confidentiality or privilege necessary for effective performance of their role if an adult child, relative, or friend is present in a room or used as an informal interpreter. Clients who are deaf and do not communicate through ASL may not be able to access interpretation services through OCDV's existing providers, but all efforts will be made to engage these clients, including the potential use of friends and/or non-minor family members as interpreters. need non-ASL interpretation

III. Identification and Assessment of LEP Communities

OCDV utilizes the United States Department of Justice "Four Factor Analysis" (<https://ojp.gov/about/ocr/lep.htm>) to aid the determination of the language access needs of the Office.

Factor 1: The Number and Proportion of LEP Persons in the Eligible Service Population

The New York City Department of City Planning, utilizing the United States Census' American Community Survey, 2011-2015, determined the most common languages throughout the City and by borough.

Table 1

This table reflects English and the top ten non-English languages spoken at home by New York City residents aged five years and older, Citywide and by borough.

NYC Languages – Census' American Community Survey, 2011-2015 [†]							
#	Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island	
1	English (50.86%)	Spanish	English	English	English	English	
2	Spanish (24.6%)	English	Spanish	Spanish	Spanish	Spanish	
3	Chinese* (5.89%)	Kru, Ibo, Yoruba	Chinese*	Chinese*	Chinese*	Russian	
4	Russian (2.50%)	Bengali	Russian	French	Bengali	Italian	
5	French Creole (1.43%)	French	Yiddish	Korean	Korean	Chinese*	
6	Bengali (1.22%)	Albanian	French Creole	Russian	Russian	Arabic	
7	Yiddish (1.10%)	Italian	Arabic	Japanese	Tagalog	Albanian	
8	French (1.02%)	Mande	Hebrew	German	Greek	Polish	
9	Italian (1.01%)	Arabic	Italian	Hebrew	French Creole	Tagalog	
10	Korean (0.93%)	Chinese*	Polish	Italian	Polish	Urdu	
11	Arabic (0.81%)	Fulani	Urdu	Arabic	Italian	Korean	
[†] Population 5 years and over more information 2011-2015 American Community Survey Public Use Microdata 5-Year Sample *Includes responses of Chinese, Cantonese, Mandarin, and Formosan							

Table 2

This table reflects the top ten languages spoken at home by NYC residents ages 5 and older, Citywide and by borough for those who responded as speaking English less than “very well.”

NYC LEP Languages – Census' American Community Survey, 2011-2015 [†]						
#	Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island
1	Spanish (48.91%)	Spanish	Spanish	Spanish	Spanish	Spanish
2	Chinese* (17.48%)	Bengali	Chinese*	Chinese*	Chinese*	Chinese*
3	Russian (6.39%)	Kru, Ibo, Yoruba	Russian	French	Korean	Russian
4	Bengali (2.82%)	French	French Creole	Japanese	Bengali	Italian
5	French Creole (2.76%)	Albanian	Yiddish	Korean	Russian	Arabic
6	Korean (2.40%)	Chinese*	Arabic	Russian	Punjabi	Albanian
7	Italian (1.51%)	Italian	Polish	Arabic	Polish	Korean
8	Yiddish (1.51%)	Arabic	Urdu	Italian	Greek	Polish
9	Arabic (1.47%)	Mande	Italian	Portuguese	Tagalog	Tagalog
10	Polish (1.38%)	Fulani	Bengali	Polish	French Creole	Urdu
[†] Population ≥ 5 more information 2011-2015 American Community Survey 5-Year Estimates *Includes responses of Chinese, Cantonese, Mandarin, and Formosan						

Table 3

This table reflects data from the New York City Department of Education Citywide Parent’s Preferred Language Report. These responses indicate the desired languages of communication of NYC DOE students’ parents or guardians.

Parent’s Non-English Preferred Language, 2011-2015		
#	Citywide	Percent
1	Spanish	62.8%
2	Chinese, Any	17.0%
3	Bengali	4.5%
4	Arabic	2.6%
5	Russian	2.5%
6	Urdu	1.7%
7	Haitian Creole	1.2%
8	Korean	1.2%
9	French	0.8%
10	Polish	0.7%
11	Punjabi	0.6%
12	Albanian	0.6%

Factor 2: The Frequency with Which LEP Individuals Come in Contact with the Agency

With the enactment of Local Law 30 of 2017, New York City’s list of designated citywide languages expanded to ten, including New York City’s top six LEP languages (indicated as speaking English “less than very well”) as determined by United States Census data, and an additional four languages as determined by NYC Department of Education language trend information. The determination of these languages also took into account rates of City services engagement and language frequency trends. The ten languages are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish. OCDV’s data on citywide client primary language indications aligns with these ten languages. *Brooklyn, Manhattan, and Queens have borough-specific top ten languages not included in the citywide list; those languages and their percentage of total languages of clients at the FJCs citywide are: Japanese (0.19%), Portuguese 0.15%), Punjabi (0.12%), and Hebrew (0.08%). Due to the overall small percentages of these speakers, OCDV is not currently prioritizing inclusion of these languages in its list of Office designated languages.*

Table 4

This table reflects English and the top ten non-English languages indicated by FJC clients as their primary language for the combined 2015 and 2016 calendar years.

FJC Primary Language 1/2015-12/2016 [†]							
#	Citywide ⁱ	Bronx [†]	Brooklyn	Manhattan	Queens	Staten Island ^{o†}	
1	English (64.05%)	English	English	English	English	English	English
2	Spanish (23.25%)	Spanish	Spanish	Spanish	Spanish	Spanish	Spanish
3	Chinese (2.49%)	French	Russian	Chinese**	Chinese**	Arabic	
4	Russian (1.10%)	Bengali	Chinese**	French	Bengali	Polish	
5	Bengali (0.83%)	Arabic	Arabic	Russian	Korean	--	
6	Arabic (0.61%)	--	Haitian Creole*	Arabic	Russian	--	
7	French (0.47%)	--	Bengali	Japanese	Arabic	--	
8	Urdu (0.30%)	--	Urdu	Portuguese	Polish	--	
9	Korean (0.29%)	--	French	Bengali	Urdu	--	
10	Polish (0.29%)	--	Polish	Korean	Japanese	--	
11	Haitian Creole* (0.27%)	--	Hebrew	Polish	Punjabi	--	

[†] Excluding results of < 10 client responses (of 2015 and 2016 total data) or < 5 client responses of the limited 2016-only data available for the SIFJC

ⁱ Percentages of total client primary language data collected for 1/2015 – 12/2016, of a total 43,459 unique clients

^o SIFJC opened 6/2016, thus providing limited primary language data for 6/2016 – 12/2016

* Haitian Creole combined total of Haitian and French Creole responses

**Chinese – combined Mandarin and Cantonese responses

Table 5

This table reflects the top ten languages requested for telephonic interpretation at the FJCs. OCDV does not currently record services provided in a non-English language by a provider fluent or sufficiently proficient in that language.

Telephonic Interpretation Usage 01/01/2016 – 12/31/2016						
#	Citywide	Bronx	Brooklyn	Manhattan	Queens	Staten Island ^{*i}
1	Spanish (59.41%)	Spanish	Spanish	Spanish	Spanish	Spanish
2	Mandarin (8.43%)	Arabic	Russian	Mandarin	Mandarin	Russian
3	Arabic (7.26%)	Bengali	Arabic	Cantonese	Korean	Sinhalese
4	Russian (5.06%)	French	Mandarin	Arabic	Arabic	Polish
5	Bengali (4.58%)	Burmese	Bengali	French	Bengali	Arabic
6	Korean (2.53%)	Urdu	Haitian Creole	Punjabi	Russian	Urdu
7	Cantonese (1.96%)	Haitian Creole	Cantonese	Haitian Creole	Hindi	--
8	French (1.94%)	(Tie8) Akan/Twi	French	Bengali	Cantonese	--
9	Haitian Creole (1.74%)	(Tie8) Polish	Polish	Russian	Punjabi	--
10	Urdu (1.48%)	(Tie8) Swahili	Hungarian	Korean	Polish	--
* SIFJC opened 6/2016, providing data from opening to 12/31/2016						
i Excluding results of < 4 calls for a top 10 telephonic interpretation usage language						

Factor 3: Explanation of the Nature and Importance of the Programs/Services for the LEP Person

Due to the often complex circumstances of intimate partner violence, sex trafficking, and elder abuse, a holistic and multifaceted approach to services and systems is critical for a victim or survivor 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 often 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.

Outreach efforts, training, and engagement are focused, more generally, on community members. This information, while very important, is less critically essential for language access than service provision. While language access planning and, especially, translation of outreach documents are priorities for the Office, they are prioritized after the real-time provision of services.

Factor 4: The Resources Available to the Agency and the Costs of Providing Various Types of Language Services

Resources Available

Family Justice Centers and Community Outreach

Family Justice Centers

OCDV administrative staff and partner agency staff located at the Family Justices Centers have:

- Access to telephonic interpretation provided by a City-contracted provider, in over 240 languages;
- Multilingual and diverse staff from City and community-based organizations located onsite, 199 of whom, in 2016, reported speaking at least one of 40 non-English languages; 21% of whom reported speaking more than one non-English language;
- 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 phone answering systems with standard greetings leading into language trees answered by onsite OCDV or partner staff who speak the selected language. Language trees at each FJC include:

Family Justice Center	Language Tree Options								
	English	Spanish	Italian	Mandarin	Cantonese	French	Korean	Bengali	Hindi
Bronx	✓	✓	✓						
Brooklyn	✓	✓							
Manhattan	✓	✓		✓	✓	✓			
Queens	✓	✓		✓			✓	✓	✓
Staten Island	✓	✓							

- The FJC informational flyer currently available in English and Spanish; will be available in all ten designated languages by July 1, 2018.

Community Outreach

OCDV 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 include:
 - A handout about OCDV and the Domestic Violence Hotline is available in a multi-language accordion-fold pocket document which includes English, Spanish, Russian, Chinese, Arabic, and Bengali (will be available in the additional five designated languages by July 1, 2018); and

- A handout about the FJC locations and services is available in a single-language accordion-fold pocket document in the following languages: English, Spanish, Russian, Chinese, Arabic, and Bengali (will be available in the additional five designated languages by July 1, 2018).

Policy and Training Institute

The Domestic Violence Training Team

The Training Team has: multilingual staff currently providing trainings in English and Spanish.

Healthy Relationship Training Academy

The Academy staff has: multilingual staff currently providing trainings in English and Spanish.

Cost of Providing Language Services

2016 and 2017 Translations and Telephonic Interpretation

OCDV utilized \$1,674 for materials translations and \$141,142 for telephonic interpretation services for a total of at least \$142,816 in language access costs in 2016. In 2017, OCDV utilized \$128,137.97 for telephonic interpretation services and \$1,249.88 for materials translations.

Table 6

Use of telephonic interpretation varies by borough due to the number of clients seen by each FJC, degree of language diversity of FJC clients, as well as the availability and capacity of FJC onsite staff members to meet with and serve LEP clients in their primary language.

FJC Telephonic Interpretation Costs 1/2016 - 12/31/2016	
Borough	Total
Brooklyn	\$43,057.45
Bronx	\$22,170.43
Manhattan	\$17,385.87
Queens	\$51,201.17
Staten Island*	\$7,327.00
All FJCs	\$141,141.92
* SIFJC opened 6/2016, providing data from opening to 12/31/2016	

FJC Telephonic Interpretation Costs 1/2017 - 12/31/2017	
Borough	Total
Brooklyn	\$45,707.53
Bronx	\$17,583.59
Manhattan	\$11,411.50
Queens	\$39,751.60
Staten Island	\$13,683.75
All FJCs	\$128,137.97

FY2018 Projection for Translation of Commonly Distributed Documents

OCDV projects spending \$8,665.20 in FY18 for expanded translations of the Office's commonly distributed materials in the designated languages.

IV. Provision of Language Access Services

Language Access in General Agency Services

OCDV 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 OCDV administrative staff member. OCDV does not currently use selective certification to recruit language speakers; however, candidates with multilingual abilities are strongly encouraged to apply for positions. OCDV aims to identify means to prioritize language abilities in future contracts and other staffing agreements.

Family Justice Center Operations

Family Justice Centers

In-Person Interactions

Upon entry to the FJCs, members of the public encounter signage in multiple languages, including the top ten NYC designated languages, indicating that interpretation is available and how or where complaints may be made. Additionally, each reception desk is staffed with personnel trained in offering and using telephonic interpretation to ensure that effective and meaningful communication is possible. Each FJC has "I speak" cards available for clients to take and use when engaging with other systems or organizations to indicate that they require assistance in a non-English language. After interacting with reception staff, clients meet in private with screening staff to ensure that the services offered by the FJCs are appropriate for the client. At that point, the screener verifies the language spoken by the client either by speaking in that language, assisting the LEP person with pointing to their language from a list of languages, or via telephonic interpretation. After screening, the subsequent staff people scheduled to meet with that client are informed of the client's primary language and instructed to use telephonic interpretation with that client unless the staff member speaks the client's language or the client refuses telephonic interpretation services.

Over-the-Phone Interactions

FJC main numbers have standard greetings leading into language trees with lines answered by onsite OCDV or partner agency staff who speak the selected language. Additionally, if a caller reaches a main phone line speaking a language not available on the language tree, the FJC administrative or partner agency staff conferences in the telephonic interpreter service.

Public Events

OCDV includes information on accessibility for people with disabilities for all FJC trainings, including the availability of ASL interpretation, upon request. If OCDV receives a request for ASL or other interpretation for partner and community based organization staff training, OCDV administrative staff reaches out to a contracted provider for that service to schedule interpretation in advance of the training.

Language Need Tracking

All clients who receive services from the FJCs meet with a screener upon their first visit. That screener records the client's primary language and, beginning in January 2017, the client's level of proficiency in English. The demographic information is kept in OCDV's FJC client intake database, which is maintained by the New York City Department of Information Technology and Telecommunications (DOITT). The limited information recorded in the client intake database is available to other providers as needed and dependent upon clients' individual confidentiality and privacy requests. At this time, OCDV does not track the frequency or language spoken of LEP callers to the main lines at the FJCs or to OCDV's main administrative phone line.

Outreach

In-Person Interactions

OCDV outreach staff disseminate information in a responsible and accessible way to build trust and illuminate pathways to support. Outreach is also done to help identify community-based resources and programs for victims and survivors, and strategize ways to reach all New York City communities. Community Liaisons conduct outreach in English, Spanish, and a variety of other languages, as well as work with partners who are often speakers of languages other than English. OCDV identifies LEP communities for outreach based on rates of LEP FJC client service engagement and via collaboration with community based organizations and stakeholders.

If Community Liaisons encounter a member of the public speaking a non-English language, all efforts are made to connect that person with an outreach worker speaking that language. If an outreach worker who is fluent or sufficiently proficient in that language is not available, all outreach workers have access to telephonic interpretation through a City-contracted provider, available in over 240 languages. Additionally, outreach workers have informational materials available in multiple languages, which include a main document with information in six languages – English, Spanish, Russian, Chinese, Arabic, and Bengali. OCDV will translate these documents into the additional five designated citywide languages prior to the July 1, 2018 deadline. These languages, prioritized for translation, are: Haitian Creole, Korean, Urdu, French, and Polish.

Over-the-Phone Interactions

Outreach staff do not typically require interpretation services for over-the-phone interactions. However, if an outreach staff member does connect via telephone with a speaker of a non- English language, the outreach staff conferences in the telephonic interpreter service.

Language Need Tracking

OCDV does not track the frequency or language spoken by LEP constituents encountered at public events.

Policy and Training Institute

The Training Team

Trainings

The DV Training Team provides trainings on IPV, trauma-informed care, vicarious trauma, and other topics. Members of the current DV Training Team speak English, Spanish, and a variety of other languages. The Team currently offers its IPV 101 training in Spanish, and aims to offer more training in Spanish in the future. Requests for trainings in Spanish come via OCDV's website as well as from community groups and organizations. Additionally, OCDV includes information on accessibility for people with disabilities for all Team trainings and conferences, including the availability of ASL interpretation upon request. The DV Training Team does not typically receive calls or requests in languages other than English or Spanish, but if a request was made the DV Training Team would utilize the telephonic interpretation service.

Healthy Relationship Training Academy (the Academy)

Trainings

The Academy provides peer-led workshops to young people, parents, caregivers, and educators. The Academy provides trainings in Spanish for its primary healthy relationships and abuse training as well as its technology safety and abuse training. The Academy currently has staff members who speak Spanish and other non-English languages and provide trainings for young people and caregivers in English and Spanish. Requests for trainings in Spanish come via OCDV's website as well as from other community groups and organizations. The Academy does not typically receive calls or requests in languages other than English or Spanish, but if a request was made then the Academy would utilize the telephonic interpretation service.

Emergency Preparedness

OCDV 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 Office or FJC onsite partner agency staff that are fluent or sufficiently proficient in the non-English language of the client seeking assistance during an emergency, as appropriate. While OCDV and FJC onsite partner agency staff may not be at full capacity due to the circumstances of the emergency, the reduced staff will continue to provide services for any clients that may contact the Office or appear at one of the FJCs. OCDV will forward relevant emergency notifications from the Office of Emergency Management (OEM), available with links in over 12 languages, on OCDV social media accounts. Additionally, in the case of weather or other emergencies, the FJCs may post printed standard notifications, in 12 languages, provided by OEM in conspicuous locations at relevant sites. OCDV plans to update and expand its emergency preparedness plans and aims to include information on providing

services to LEP people in the case of an emergency as well as addressing unique needs or circumstances that victims or survivors of intimate partner violence may face in seeking safety during an emergency.

Communications

Language Access is considered in Office communications, including electronic media and ethnic and community media, for general content as well as communications in the case of an emergency. OCDV currently utilizes the NYC Twitter Spanish-language account to disseminate posts at the discretion of City Hall communications. OCDV plans to expand its outreach to ethnic and community media by targeting populations and communities that reflect OCDV and the City's goals around domestic violence awareness and prevention. These populations include: Jewish, Muslim, Arab, Asian, South Asian, Caribbean, and LGBTQ communities. OCDV also plans to focus more effort on connecting with ethnic and community media in regards to its outreach and FJC programs. The Office does not currently post content in multiple languages on social media, but aims to identify potential means to provide future multi-language social media content.

Plain Language

OCDV created a Plain Language Working Group to ensure plain language standards are included in all current and future agency materials. The members of this group were identified for their involvement in language access and/or document creation in their role or unit. The Working Group members attended a 1.5 day Plain Language training administered by the Department of Citywide Administrative Services (DCAS). The Plain Language Working Group is responsible for reviewing each existing commonly distributed document for plain language standards and producing revised versions, if necessary, prior to sending the documents for translation in the designated ten languages. The Plain Language Working Group members are also responsible for training staff in their particular units on the principles of plain language.

Translation Services

Other than limited outreach materials and client services navigation documents, OCDV does not generally create materials for public distribution. When determining the agency's most commonly distributed materials, OCDV placed documents into two general categories. The first and highest priority category consists of documents intended for victims and survivors of intimate partner violence and the public, including agency outreach and client services navigation documents. The second group of documents would be those intended for service providers and other government or community based organization staff. The second category of documents is not intended for the general public and is not currently being prioritized for translation, although some items are available in Spanish in addition to English.

OCDV plans to conduct a plain language review and revision of all public-facing documents prior to sending the documents for translation in the City's designated languages. After the documents are translated, OCDV will pull upon Volunteer Language Bank and multilingual OCDV and FJC on-site partner agency staff to conduct reviews to ensure that the translations are coherent, sensitive to issues of gender based violence, as well as use the vocabulary common in the provision of services to victims and

survivors of intimate partner violence, elder abuse, and sex trafficking. The secondarily reviewed documents will then be sent for finalization and typesetting with a final review of content and formatting.

OCDV's website uses a Google Translate plugin to provide general translation of content. OCDV plans to increase access for LEP people by including navigation information on the general website in the City's designated languages so that the LEP public may access translated documents without using a plugin.

V. Training

OCDV staff and all onsite partner staff working at the FJCs receive Language Access training upon orientation and at least once a year. Training on Language Access primarily focuses on the delivery of services using telephonic interpretation when OCDV staff and FJC partner staff members do not speak the primary language spoken by a client or community member. OCDV aims to research the existence and availability of additional supports and training for OCDV staff and FJC partner staff providing services or information in non-English languages to better serve all victims and survivors of intimate partner violence, elder abuse, and sex trafficking.

Orientation Training

All OCDV staff and FJC onsite partner agency staff members who work with members of the public are provided information on language access rules and instructions on using telephonic interpretation during orientation. This training is part of a larger orientation to OCDV and/or FJC policies and procedures. Outreach Team staff and FJC onsite partner agency staff receive and review information on how to access telephonic interpretation, information on engaging interpreters, how to recognize if there is a problem in the interpretation, how to resolve such problems, and where and how to report issues or complaints.

Yearly Language Access Training

All OCDV staff and FJC partner agency staff members who work with members of the public are required to receive annual language access training. This training is scheduled to occur each March during required periodic staff meetings.

On-site FJC trainings are coordinated and presented by OCDV administrative staff member with a title of Executive Director, Deputy Director or Director of Programs and Community Partnerships. The FJC training is presented at all staff or discipline-specific meetings. Outreach staff receive the training provided by the Director of Outreach. Policy and Training Institute staff receive the training provided by the Assistant Commissioner of Policy and Training, Director of Policy and Training, Deputy Director of Policy and Training, Policy Advisor, or the Language Access Coordinator (LAC). The LAC will provide yearly trainings to those designated to provide the annual training to other staff.

Language Access Training Topics

- Overview of Federal and State Laws
- Overview of Language Access history in NYC, including Executive Orders 41 (2003) and Executive Order 120 (2008)
- Overview of Local Law 30 (2016)
- Information on telephonic interpretation, including how to offer and use the services
- Information on the over 240 languages offered through contracted telephonic interpretation and how to troubleshoot issues of securing effective interpretation for less commonly encountered dialects or languages
- Information on process to provide positive and negative feedback on interpretation services, interpreter conduct, or issues securing telephonic interpretation

The trainings will include information that is site or discipline-specific, such as information on accessing telephonic interpretation in the field or using telephonic interpretation with victims and survivors of trauma.

VI. Record Keeping and Evaluation

Language Service Tracking

OCDV reports and tracks 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 LAC is responsible for retrieving language tracking data from each OCDV 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 conducts quarterly reviews of language access data to identify trends or potential areas for improvement. Additionally, the LAC convenes quarterly meetings of the Language Access Cabinet to review information, assess quality of services, and identify strategies for improvement. The Language Access Cabinet is comprised of representatives from each of OCDV's units.

Family Justice Center Operations

Family Justice Centers

Provision of language services is primarily tracked by the FJC client intake database and telephonic interpretation usage. All FJC clients meet with a screener upon their first visit, who records information in the FJC client intake database, including client's primary language and interpretation needs this database is maintained by DoITT. OCDV's FJC client intake database uses a list of 161 languages as well as provides an option of "other." If a client indicates a language that is not listed, the screener will select the "other" option and record in an open field the language spoken by the client. The limited information recorded in the FJC client intake database is available to other providers as needed, dependent upon clients' individual confidentiality and privacy requests. Reports can be run that aggregate the use of telephonic interpretation to provide services.

Outreach

Outreach staff usage of telephonic interpretation can be tracked by their unique identification numbers in the telephonic interpretation bills. Additionally, Outreach Team staff are track the non-English language used at the outreach events or presentations.

Policy and Training Institute

Domestic Violence Training Team

The DV Training Team records the language in which the training is presented in an internal database.

Healthy Relationship Training Academy

The Academy records the language in which each workshop or training is provided in an internal database.

VII. Resource Analysis and Planning

Staffing and Contracts

OCDV staff and FJC onsite partner agency staff members provide meaningful access to these services through telephonic interpretation and the provision of services in an LEP client's non-English language by a speaker who is fluent or sufficiently proficient in that language. OCDV does not currently track general outreach or the provision of services in a non-English language by a staff member who is fluent or sufficiently proficient in that language. The agency aims to develop a process to track that service provision to better capture language access at the FJCs and through outreach activities.

OCDV does not currently use selective certification to recruit language speakers; however, candidates with multilingual abilities are strongly encouraged to apply for positions. OCDV aims to identify means to require or prioritize language abilities in future contracts and other staffing agreements.

Improving Language Access Services

OCDV will develop and implement a Language Services Feedback Form, available in the ten designated languages so that LEP clients may provide confidential feedback on the quality of language services provided. This survey, modeled after the New York City Department of Health and Mental Hygiene's (DOHMH) Language Services Feedback form asks: the type of language services the LEP person received on a specific date; level of satisfaction the LEP person had with the language services provided; and additional feedback or suggestions for improvement of language services. OCDV anticipates having this form available at its FJCs in FY19.

The information gathered from the Language Services Feedback form will inform OCDV's future Language Access Implementation Plan priorities and goals, as well as assist in identifying trends and opportunities for improvement. Additionally, OCDV will coordinate with MOIA and the Office of the Language Services Coordinator (OLSC) to ensure compliance with any other assessment or reporting requirements.

VIII. Outreach and Public Awareness of Language Access Services

OCDV provides notification of language access services via outreach materials and the FJCs have onsite signage with notifications of rights to interpretation. When OCDV plans a public service announcement campaign, language access is considered in the provision of materials in languages other than English.

IX. Language Access Complaints

Language Access and Complaint Notification

Signage informing LEP clients of the right to an interpreter as well as the right to file a complaint with a manager and/or via 311 is posted in conspicuous locations throughout FJC facilities. This signage, provided by MOIA, provides information in New York City's top ten LEP languages – Spanish, Chinese, Russian, Haitian Creole, Bengali, Korean, Arabic, Urdu, French, and Polish.

311 Complaints

If a client, provider or member of the public files a complaint or request to 311 about language access or for additional language services, that complaint or request is to be forwarded to the agency that the complaint or request referenced and to the OLSC within the Mayor's Office of Operations. Complaints routed to OCDV are then to be forwarded to the LAC for review and response. The LAC is to respond directly to the complaint, if possible and appropriate, or forward the complaint to the appropriate director or supervisor of the unit of the complaint's origin. The unit director or supervisor is to resolve the complaint and report the resolution back to the LAC.

Complaints to OCDV Staff

If a client, provider or member of the public lodges a complaint to a director or supervisor of an OCDV work unit, that director or supervisor is responsible for recording the nature of the complaint and resolving the complaint. Upon resolution of the complaint, the unit director or supervisor is responsible for emailing a summary of the complaint and resolution to the LAC. This summary must include the date and location of the complaint, the nature of the complaint and any overarching, institutional, or systemic barriers contributing to the complaint or hindering or preventing its resolution. Complaints specific to contracted telephonic or in-person interpretation should be forwarded to the LAC for resolution. The LAC will communicate the resolution and any additional information stemming from it to the unit director or supervisor.

X. Implementation Plan Logistics

Language Access Coordinator

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Language Access Plan Implementation Logistics

OCDV will update its Language Access Implementation Plan when major changes occur in organizational structure, upon meeting significant language access goals, or at least every three years, whichever occurs first. OCDV's Language Access Implementation Plan is posted on the Office website and updated versions will be posted when they occur. Additionally, OCDV will report annually to MOIA, OLSC, and any other required parties on annual language access data and the achievement of milestones beyond the legal requirements.

Language Access Plan Implementation Timeline – FY18

Table 7: Implementation Timeline for Document Translation

Month	Implementation Timeline	
July 2017	Identify "most commonly distributed" documents	
August 2017		
September 2017		
October 2017		
November 2017		Plain Language training for key agency staff
December 2017		
January 2018	Revise documents for plain language	
February 2018		Send plain Language documents for translation
March 2018		
April 2018	Review translations	
May 2018		Receive corrected versions of translations
June 2018		
July 2018	All identified documents in the top designated languages	

Language Access Plan Goals and Milestones – FY19 and FY20

Table 8: Implementation Timeline for Future Goals

Goal	FY 19				FY 20		
Translate second priority OCDV documents into LEP languages*	Plain language review						
		Identify Languages for translation	Send for translation	Review translations and finalize			
Review OCDV's online resources for language accessibility			Review website and NYC HOPE portal for ease of access and translation quality		Explore options for enhancing language access online		Implement changes where possible
Track languages spoken by LEP callers to the FJCs	Discuss methods for data				Review data collected		
		Select method and implement tracking/data				Implement changes in data collection as necessary	Review any changes implemented
Operationalize language services feedback for FJC clients	Develop client feedback form				Review data collected		
		Send form for translation	Review translations, finalize form and distribute to FJCs			Implement changes in form as necessary	Review any changes implemented
Enhance services for LEP clients at the FJCs					Based on data collected from client feedback and calls to FJCs, discuss additional trainings and supports that may be needed for onsite staff and telephonic interpreters		
Prioritize language abilities in future contracts and staffing	Explore how language ability may be prioritized through contracts						
			Develop contracts that prioritize language abilities, particularly at FJCs			Implement new contracts	
Review OCDV's Emergency Preparedness plan for language accessibility	Review current plan and make updates						

*These documents are distributed to service providers at city agencies and community based organizations and not strictly public facing. As such we do not anticipate translating these into all 10 LEP languages, but some subset that is relevant to service providers.



The following document outlines SBS' Language Access Implementation Plan for Local Law 30

I. 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

II. 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.

III. 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: *The number of LEP persons served or encountered in the eligible service area*

In anticipation of implementing our original Language Access Plan, SBS completed an analysis of the linguistic profile of LEP persons in the community districts in which SBS' central office and brick-and-mortar locations are located to determine the number and proportion of LEP individuals in those areas, as well as their preferred languages. We currently leverage data from the American Community Survey to inform our decisions: <http://www.nyc.gov/html/dcp/html/census/popacs.shtml>.

2. Department of Justice Factor 2: *The frequency with which LEP individuals come in contact with the program*

SBS has LEP language support request tracking already in place at all Workforce1 Career Centers. There is a regular influx of LEP persons into all of our walk-in facilities, which would likely only increase with the implementation of LEP supports, multiple-language web content, and service descriptions.

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.

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

In addition, after evaluating the customer requests from across the agency, 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

Based on the above analysis, no supplemental languages to the designated citywide languages are necessary to provide services.

IV. 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 requested that contracted vendors recruit bilingual staff at the walk-in centers to meet the needs of the community in which they serve.
 - 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 evolve to meet the needs of the market and community.
 - Marketing Materials/Notice of Services Provided: This is an ongoing need as our services evolve to meet the needs of the market and community.

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 6 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 through the SBS Language Bank, the Citywide Volunteer Language Bank, and through contracted vendors. 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. If further assistance communicating with the customer is required, use the SBS Language Bank which can be accessed on SBS' internal web
- For In-Person Interpretation: Professional interpreters are available through our vendor Accurate Communication. 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.

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.

V. 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.

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.

VI. 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.

In addition, SBS’ looks forward to the work that will be done in the summer to evaluate language access principles at our physical locations across the City. Based on the feedback provided, SBS will evaluate what other adaptations or modifications should be implemented in these locations. All recommendations and modifications or changes to the plan will be captured as part of this Implementation Plan.

VII. Resource analysis and planning

SBS will leverage the following resources to implement the language access plan.

- Telephonic Interpretation: Language Line
- Document translation: Geneva Worldwide
- Interpretation: Accurate Communication
- 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) systems (will be consolidated in FY19 into a single solution)

- SBS communications and marketing personnel

In order to identify and close gaps in access in service, SBS will follow this protocol:

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

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.

VIII. Outreach and public awareness of language access services

SBS provides services in multiple languages at its 21 Workforce1 Career Centers 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.

IX. 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. For CY 2017 there were no complaints registered.

X. Implementation plan logistics

Michael Silver is the Agency Language Access Coordinator for SBS. Contact information is below:

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The SBS implementation plan logistics are outlined in the table below:

Language access goal	Milestones	Responsible staff	Deadline
Post implementation plan on website	After finalization of LA plan	SBS Language Access Coordinator and Communications team	July 2018
Identify any essential documents not yet translated	Each division LA Coordinator to identify	SBS Language Access Coordinator and Communications team	July 2018
Translate any essential documents not yet translated		SBS Language Access Coordinator and Division Language Access Coordinators	December 2018
Update signage at walk-in centers as needed	As any new vendors are finalized, signage at any new locations will meet guidelines.	SBS Language Access Coordinator and Division Language Access Coordinators	December 2018
Establish training dates for each division	Each division to set schedule	SBS Language Access Coordinator and Division Language Access Coordinators	August 2018
Complete annual training for each divisions	By the end of each Fiscal Year	SBS Language Access Coordinator and Division Language Access Coordinators	June 2019
Evaluation of vendors and services	Every 6 months	SBS Language Access Coordinator, Division Language Access Coordinators, vendors	October 2018 and April 2019
New programs and essential documents translated	As new programming is established, funded, and launched	Division Language Access Coordinators and Communications team	Ongoing

New York City Taxi and Limousine Commission
Language Access Implementation Plan
May 1, 2018

Language Access Coordinator: Malcolm Cain

1. Agency Mission and Background

The New York City Taxi and Limousine Commission (TLC) is a licensing and regulatory agency that oversees private for-hire transportation in New York City. TLC provides direct services to TLC licensees and members of the public on a daily basis at three primary facilities in Manhattan, Long Island City, and Woodside. Through our licensing facility, TLC licenses over 180,000 drivers and 130,000 vehicles that operate in the taxi and for-hire industries, as well as associated bases and other businesses. At our Woodside facility, TLC inspectors complete safety and emissions inspections on all TLC-licensed vehicles. And from our Manhattan headquarters, TLC's External Affairs team provides licensees, potential licensees and the riding public information and assistance through online content, industry emails, palm cards and at TLC information events held throughout the City.

2. Agency Language Access Goals

One of the agency's overarching goals is to provide quality customer service to our licensees and members of the public, including those who have limited-English proficiency (LEP), through in-person interactions at our facilities, conversations on the telephone or via e-mail and written correspondence. Specifically, the agency's Language Access Plan includes policies which help ensure all information an individual would need to get or maintain a TLC license is translated into the top ten list of citywide designated languages. Additionally, the Plan includes policies concerning the translation of important public information, such as passenger bills of right as well as information on how to locate lost property or file a complaint. The Language Access Coordinator and the Language Access Cabinet monitor the Agency's language access policy on a regular basis to ensure all divisions are following the policies identified in this plan.

3. LEP Population Assessment

3.1 Proportion of LEP population

Drivers represent the largest category of licensee, with over 180,000 currently licensed by TLC. Many of these drivers also hold additional TLC licenses (for example, drivers often own the vehicles they operate



and as such are licensed as both drivers and vehicle owners). Accordingly, for purposes of this section, data on drivers will be used to assess the LEP population TLC serves.

Based on U.S. census data, over 3,000,000 New Yorkers (approximately 35%) were born in another country and approximately 25% of residents have LEP. TLC data show that approximately 92% of licensed drivers were born in another country. Although TLC does not have accurate data on the number of LEP drivers, given that the percentage of drivers who are immigrants is significantly higher than the percentage reported for all residents, it is reasonably assumed that the proportion drivers who have LEP is also higher than the 25% reported citywide. Therefore, TLC estimates the population of LEP drivers well exceeds 45,000 individuals.

3.2 LEP contact frequency

TLC staff has regular and frequent contact with our licensees and members of the public. On an average day, 600 individuals are seen at TLC's Long Island City facility, 455 calls are answered in the call center and over 750 vehicles are inspected at the Woodside inspection facility. Assuming more than a quarter of our licensees have LEP, it is estimated that TLC staff interacts with more than 450 LEP individuals each day.

Additionally, TLC has recently undertaken a major initiative to significantly increase the number of driver outreach events held throughout the City. These events are an opportunity for drivers to ask important questions and learn about TLC rules and regulations. At these events, any driver that has a question or concern is asked to complete an intake form summarizing the issue. This form includes a question asking for the driver's preferred language. As this dataset grows, information gathered on drivers' preferred language will be used by the Language Access Coordinator to help determine the adequacy of TLC's language access services and inform any necessary policy changes.

3.3 Importance of language access services

The failure to provide language access services to the LEP population would have a negative impact on our licensees and the broad agency charge of furthering safe and reliable for-hire transportation in the City. A prospective driver may not know the process to apply for a TLC license, a vehicle owner may misunderstand the important information a call center representative is providing on the telephone, and a member of the public may be unable to share necessary details when discussing an incident with a TLC prosecutor.

3.4 Available language access resources



To provide necessary language access services, TLC relies, as described in the following section, on bilingual staff as well as citywide contracts with interpretation and translation vendors. In the current fiscal year, TLC budgeted \$80,000 for language access services.

4. Provision of Language Access Services

To ensure the large portion of LEP individuals served by TLC staff receive language access services, TLC provides telephonic interpretation services as specified in a citywide agreement that can be used in-person at a TLC facility or during a telephone conversation with a LEP caller. TLC utilizes language service cards at facility counters and displayed signage to help identify the primary languages of LEP customers.

In addition to interpretation services, TLC uses the services of a translation vendor as specified in a citywide agreement to translate essential public communications. Such communications include industry notices, which are emailed to TLC licensees and posted on our website, licensing guides, information poster and fliers, as well as the monthly “Commissioner’s Corner” column printed in various industry newspapers, half of which are ethnic newspapers. All public-facing documents are reviewed and edited by TLC staff trained in plain language best practices. As part of this review, TLC staff determine if the document is “essential” (information necessary to obtain or maintain a TLC license) and, as such, should be translated.

TLC also relies on bilingual staff who volunteer to provide language access services. These individuals directly serve LEP individuals that contact TLC, offer in-person interpretation at public events and verify the accuracy of translations completed by our vendor. Should no bilingual staff be available to review translated materials, requests for volunteers are made through the Citywide Language Bank.

Future goals for providing language access services include incorporating services for LEP licensees as part of TLC’s business continuity planning. To this end, TLC is creating a bank of language that will be translated and used for emergency communications. Additionally, TLC will post all translated materials on TLC intranet to serve as a centralized resource for TLC staff when serving LEP individuals. Finally, TLC will formalize the process through which an individual can request an interpreter be available at TLC public hearings.

5. Training

TLC training unit trains all frontline staff on language access services. This training includes resources on how to identify an individual’s primary language and how to utilize the telephonic interpretation services. Additionally, the training unit, in conjunction with human resources, provides diversity awareness training at each TLC location. The Language Access Coordinator will monitor metrics on trainings provided to TLC staff to confirm frontline staff continues receiving periodic language access refresher trainings.

Future goals for training TLC staff on language access policies and procedures include reviewing new-hire training materials to ensure all staff receives updated language access training as part of the onboarding process. Additionally, TLC will use the onboarding process to identify bilingual staff willing to provide interpretation and translation services.

6. Record Keeping and Evaluation

TLC tracks and evaluates language access goals through a combination of indicators. TLC maintains records of the language services provided by the agency through monthly invoices and reports received from our interpretation and translation vendors. The Language Access Coordinator also observes staff servicing clients to monitor the use and quality of services provided by bilingual staff in lieu of services provided through citywide agreements. Additionally, the Language Access Cabinet is comprised of representatives from TLC departments that frequently interact with licensees and the public. Staff from licensing, external affairs, enforcement, prosecution, facilities, safety and emissions, driver education unit, and the Commissioner's office sit on the cabinet. These representatives are charged with ensuring their respective departments follow the policies contained in this Plan. These representatives regularly report the quality of language access services and highlight areas where services should be improved or additional agency support is needed.

7. Resource Analysis and Planning

Each year, the Language Access Coordinator will review this Plan to confirm all goals and objectives are being met. The Coordinator will also review metrics described above to determine the sufficiency of available resources to meet the needs of the current LEP population and will recommend any necessary changes to resource allocation. The Language Access Cabinet monitors the Agency's language access services to identify gaps in services, offer solutions to close these gaps, and implements changes to improve the quality of language access services provided.

8. Outreach and Public Awareness

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. And through driver intake forms individuals' preferred languages are recorded and tracked. Future goals include adding language on all public hearing notices informing the public how requests for an interpreter can be made before a public hearing.

9. Language Access Complaints

All language access complaints are monitored by the Language Access Coordinator. Staff responsible for the intake and review of 311 complaints as well as written correspondence forward language access complaints to the Coordinator. Additionally, the Language Access Coordinator will work with the Mayor's Office of Immigrant Affairs as well as 311 to ensure these complaints are received and addressed. The number of language access complaints received by the agency will be included in all annual language access assessments.

10. Implementation Plan Logistics

TLC will work to implement the goals identified in this language access plan over the next two years, with regular reporting to the Mayor's Office of Immigrant Affairs through the annual language access assessment. The Language Access Coordinator and Cabinet will work together to take action on the agency's language access goals, ensure major milestones are met, and will make any necessary revisions to this plan.

TLC will expand our current language access services as follows:

- All newly-created essential public communications, including industry notices and informational fliers, are now being translated into the top ten list of citywide designated languages.
- All documents currently translated into the top six preferred languages of our licensees will be translated into the ten languages identified by the Mayor's Office of Immigrant Affairs by July 1, 2018.
- TLC will formalize the process through which interpreters can be requested at public hearings by July 1, 2018, and TLC will notify the public of such process in all public hearing notices published after this date.
- Essential passenger information is now being translated into the top ten list of citywide designated languages. TLC anticipates this work will be complete and posted to the TLC website by December 31, 2018.
- TLC will work to expand translations of TLC-provided driver education materials in 2019.
- New-hire onboarding materials covering the agency's language access policies and procedures will be reviewed and revised as needed in 2019.
- TLC will incorporate comprehensive language access provisions in the agency's continuity of operations plan (COOP) by July 1, 2019.
- TLC will offer the driver exam in the ten languages identified by the Mayor's Office of Immigrant Affairs by July 1, 2020.

Local Law 30 Report

Version History

Date	Changes
June 30, 2018	Initial report as submitted to Council
September 28, 2018	Incorporates updated Language Access Implementation Plans for the following agencies: <ul style="list-style-type: none">• Department of City Planning• Department of Citywide Administrative Services• Department of Probation• Department of Records• Department of Sanitation• Department of Veterans Services• Emergency Management• New York City Law Department• New York Police Department• Small Business Services