



Language Access Implementation Plan

The Language Access Implementation Plan explains how the agency will provide services to people who have limited English proficiency (or LEP).

Agency name: Mayor's Office of Media and Entertainment

Language Access Coordinator name: Stephanie Roth

Language Access Coordinator title: Executive Director, Administration

Published date: June 7, 2024

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

- I. Agency mission and services
- II. Agency language access policy
- III. Language access needs assessment
- IV. Notice of the right to language access services
- V. Provision of language services
- VI. Resource planning
- VII. Training
- VIII. Continuous improvement planning
- IX. Goals and actions planning

Signatures

SRoth

06/07/24

Stephanie Roth, *Language Access Coordinator*
Mayor's Office of Media and Entertainment

Date

Pat Kaufman

6/12/24

Pat Swinney Kaufman, Commissioner
Mayor's Office of Media and Entertainment

Date



I. Agency Mission and Background

A. Mission of the Agency: The Mayor's Office of Media and Entertainment (MOME) mission is to support and strengthen New York City's creative economy and make it accessible to all.

B. Services and Interaction with the Public: Media and entertainment industries in MOME's portfolio include: film, television, theatre, music, publishing, advertising, and digital content. MOME comprises four divisions:

- **The Film Office**, which coordinates film and television production throughout the five boroughs.
 - This division interacts with the public by issuing film permits for the use of public property for film and television production.
- **NYC Media**, the largest municipal television and radio broadcasting entity in the country with a reach of 18 million viewers within a 50-mile radius.
 - This division interacts with the public through its television and radio network.
- **Creative Sector Programs** in film, television, theatre, music, publishing, advertising, and digital content to support the development of NYC's creative industries, which account for over 305,000 jobs, and an economic output of \$104 billion.
 - This division interacts with the public through sponsorship of media and entertainment programs (e.g., film festivals, media conferences, performances) and workforce development programs in theater and film/TV.

- **The Press Credentials Office**, this office issues press cards to journalists and media outlets so they can pass NYPD/city official lines and attend official City government press conferences and other City-government sponsored events.
 - This division interacts with the public by issuing press cards to qualified members of the press, providing customer service, educating members of the press on the application process, and supporting NYC's Ethnic and Community Media Group.

II. Agency Language Access Policy

A. Policy

Through this Language Access Implementation Plan, MOME outlines its commitment to language access and its approach to ensuring that MOME is effectively engaging with the City's limited English speakers.

MOME's approach to language access is that limited English speakers should be able to access MOME's information and services and communicate with MOME staff. It is the responsibility of MOME to proactively inform and provide language assistance services to ensure access. MOME continues to identify and address language barriers for individuals with LEP. MOME ensures accessibility to services and information to individuals with LEP by:

- Utilizing bilingual staff for some roles that involve direct engagement with the public.
- Providing phone interpretation services, through a Citywide contractor, that supports exchanges in languages not spoken by bilingual staff. Telephonic interpretation through a City contractor provides ready access in more than 170 languages. All MOME staff can access MOME's telephonic interpretation service.
- Providing translations of materials most commonly distributed to the public that contain or elicit important and necessary information regarding the provision of basic City services.

- Training for staff to ensure their commitment to providing language access by explaining the legal obligations and the resources available to them to communicate with limited English speakers and how to access those resources.
- Providing a means for filing complaints about language access at MOME and responding to those complaints.
- Airing foreign language programs on its radio station (WNYE 91.5 FM) and a cable television station (NYC world).MOME cablecasts eight hours of Spanish-language programming each day.

III. Language Access Needs Assessment

MOME applies the “four factor analysis” promulgated by the U.S. Department of Justice to assess obligations for language access as the basis for its Language Access Implementation Plan.

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

MOME looked at citywide data to assess the number or proportion of LEP persons and their languages in the eligible service population for our programs, services, and information.

According to an analysis of Census data provided by the Department of City Planning, 49% of New Yorkers above the age of five, or approximately 3.88 million New Yorkers, speak a language other than English at home. Twenty three percent of New Yorkers, or 2 million individuals, are considered limited English proficient (LEP), meaning that they self-identify as speaking English “less than very well.” LEP correlates with an increased need for language assistance. The Office of the Language Services Coordinator has determined that the ten citywide languages are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish.

Factor 2 – The frequency with which LEP individuals come into contact with MOME:

The frequency with which LEP individuals come into contact with MOME varies according to the division, as follows:

- **The Film Office** has minimal contact with LEP individuals, as follows:
 - The Office receives over ten thousand film permit applications per year, and fewer than 10 applicants for film permits self-identified as LEP individuals. This is probably

because most permit applicants are television networks, movie studios, and professional film and television production companies rather than individuals.

- The Office also responds to daily communications from residents and businesses concerning film production on public spaces in their neighborhoods. Although the Office receives few such communications from LEP individuals, potentially, any New York City resident could call the Office about film production in their neighborhoods. Film Office staff is regularly reminded about the availability of telephonic interpretation services via Language Line.
- **NYC Media** operates three broadcast television stations, one broadcast FM radio station, and five cable channels.
 - One of the broadcast television channels and one of the cable channels simulcasts government meetings and press events.
 - One of the broadcast television channels and one of the cable channels provides lifestyle programming.
 - One of the broadcast channels and one of the cable channels provides content from CUNY.
 - One of the cable channels, NYC World, provides eight hours of Spanish-language programming per day.
 - One channel is live traffic feeds, which is silent.

The potential audience for NYC Media programs is anyone who has access to a television or radio in New York City, so the proportion of LEP individuals to the overall number of people served probably reflects overall Census data for New York City. NYC Media does not track all of its television viewership or radio listenership, so we do not know the frequency that LEP individuals watch or listen to our programs.

- **The Press Credentials Office (PCO)** has a low level of contact with LEP individuals. Journalists and ethnic news outlets have the greatest need for translation services when they submit backup materials to support press card applications. The PCO has

protocols in place for providing free translations using three bi-lingual/multi-lingual employees in the PCO and MOME's translation contractor. In addition:

- The [PCO website](#) has a translate dropdown option
 - The [PCO application portal](#) has a translate dropdown option
 - PCO included Press Card [Guidelines](#) in all 10 citywide languages on the website
- **Creative Sector Programs** has minimal contact with LEP individuals. Many of MOME's workforce initiatives prepare students and jobseekers for careers in the media and entertainment industries in New York, where English is the predominant language spoken. Some of MOME's educational programs, such as film festivals that are sponsored by MOME, provide foreign language programming.

Factor 3 – The importance of benefit, service, information or encounter to the LEP person: Being able to receive information and report problems with filming activity, and press cards is important to an LEP person. Access to NYC Media and educational programs in foreign language is not as important; however, NYC Media's NYC gov station airs government proceedings (such as City Council hearings) and access to this information is important to an LEP person.

Factor 4 – Resources available: MOME has a contract for interpretation and translation and SignNexus for American sign language. Some of MOME's staff are bi-lingual or multi-lingual and can assist with interpretation and translation. And MOME's televised programs are closed-captioned for the hearing impaired to the extent required by law.

The cost to translate MOME's radio and television programs to foreign languages would be very high, and translation would exceed MOME's financial resources. Nonetheless, MOME airs some foreign-language programming that would appeal to LEP individuals, including eight hours of Spanish-language programming per day on cable channel NYC World.

IV. Notice of the Right to Language Access Services

A. Notification of Free Interpretation Signage

- MOME posts Notification of Free Interpretation Signage in reception areas. The Language Access coordinator explained how and when to reference and use the poster.
- I-speak signs are posted.
- MOME has a notice on its website for help seeking interpretation for a film permit application:
<https://www1.nyc.gov/assets/mome/pdf/mome-permit-instructions-2020-02-19.pdf>

The Press Credentials Office (PCO)

- The [PCO website](#) has a translate dropdown option
- The [PCO application portal](#) has a translate dropdown option
- PCO included Press Card [Guidelines](#) in all 10 citywide languages on the website

V. Provision of Language Access Services

A. Interpretation

- Resources available to provide interpretation
 - Vendor: LM Language Services (able to interpret in over 100 languages) and SignNexus (for American Sign Language)
 - Bilingual Staff: The agency rarely uses bilingual staff to interpret due to the availability of Language Line.
- Stephanie Roth manages interpretation requests. This involves providing staff with the contact number for LM Language Services and liaising with the vendor about billing.
- MOME provides interpretation over-the-phone primarily.
- MOME almost always uses LM Language Services for telephonic interpretation.
- Reception staff have available I-Speak cards to identify LEP individuals.
- MOME depends on its vendor LM Language Services to quality control interpretation services.
- The Language Access Coordinator and the vendor trained staff on how to request translation services on October 4, 2023.

B. Translation

- Resources available to provide translation
 - Vendor: LM Language Services
 - Bilingual Staff:
 - For MOME-created, public-facing communications, the agency uses bilingual staff to translate very short phrases (e.g., we used a native French speaking staff member to translate signs for “entrance” and “exit”). We do not use bilingual staff to translate public-facing MOME documents that are longer than 100 words. Bilingual staff may translate a document with fewer than 100 words when the staff person has specific expertise in the document being translated.
 - For external news stories (e.g., a news article) submitted to the Press Credentials Office as proof of qualification for a press card, MOME uses bilingual staff to translate for internal review purposes only.
 - Stephanie Roth, the Language Access Coordinator, project manages translation requests. Staff contact her for translations, and she submits them to MOME’s contractor.
- MOME is taking the following steps to translate the most commonly distributed documents to the public:
 - MOME’s most commonly distributed documents are the film permit application and the red carpet premiere application. MOME has no plans to translate its permit applications because the people who request these applications tend to be corporations or other media and entertainment organizations that have English-speaking staff. There is no demand for translation. Over the past several years, fewer than

10 film permit applicants identified themselves as LEP individuals.

- MOME’s primary contact with the general public is through the audiovisual programs it airs on its television and radio stations.
 - MOME’s second most commonly distributed documents are Press Credentials Office application forms and guidance documents. With respect to language access, we have focused on ensuring that telephonic interpretation and translation services are available to applicants.
 - MOME obtains appearance consent forms from people who are recorded for appearances in our radio or TV programs to comply with various laws. In April 2024, MOME translated appearance consent forms into the 10 most common Citywide languages.
-
- For the advertisement of public programs available to a particular geographic community, MOME will consider advertising the program in the predominant languages spoken in that community and in community and ethnic newspapers.
 - MOME follows plain-language principles for documents most commonly distributed to the public that contain or elicit important and necessary information regarding the provision of MOME’s services and for other public communications and MOME uses layout and design strategies to make such documents and communications easier to read, understand, and act upon.
 - MOME has Google Translate built into its website, which can translate MOME’s web-content into numerous languages. There are currently no plans for full-scale website translation.
 - MOME distributes translated material digitally and through ethnic and community media.

- MOME relies on Language Line for quality control of translated materials.
- MOME’s Language Access Coordinator periodically reminds leadership to remind staff who create public-facing materials about the duty to consider language access, plain language requirements, the appropriateness of translations, and how to request a translation.

C. Digital Communication

- MOME provides foreign language programming on its radio and television network.
- MOME is committed to providing some foreign-language programming on its radio and television network. It is impossible to translate broadcasts into the 10 citywide languages.
- MOME ensures inclusive community engagement by providing foreign language programming on its radio and television network (e.g., DW provides 8 hours of Spanish-language programming per day on an NYC Media cable channel)
- MOME’s website [explains](#) how to request interpretation services for filling out the film permit application: <https://www1.nyc.gov/assets/mome/pdf/mome-permit-instructions-2020-02-19.pdf>.
- Since 2022, MOME is the agency that issues press cards for access to City-sponsored events open to the press and behind public safety lines. With a small staff, we focused our attention on the most immediate language needs: translations

of non-English-media submitted with press card applications and availability of telephonic interpretation. In addition:

- The [PCO website](#) has a translate dropdown option
- The [PCO electronic application portal](#) has a translate dropdown option
 - PCO included the Press Card [Guidelines](#) in all 10 citywide languages on the website
- MOME has a contract with LM Language Services for interpretation and translation. We are generally able to obtain translations in three business days.

D. Emergency Communications

- MOME's emergency management liaisons are the Mayor's Office of Immigrant Affairs Language Access team in collaboration with the Community Affairs Unit liaison as part of the Language Access task force.
- MOME's emergency announcements are generally provided via Mayor Adams's press conferences and announcements on our broadcast network. It is impracticable to broadcast in all 10 languages.
- MOME will post notifications to the website that can be translated via the translate feature on the site in the event of an emergency.
- MOME's Chief Operating Officer, supervisor of the Language Access Coordinator is a member of the Agency's Senior Executive Staff and is one of MOME's designated representative for Continuity of Operations.

- MOME plays a lead role in broadcasting emergency announcements as part of the federal government's WARN Act. WARN Act announcements (e.g., severe weather emergency, missing child announcements) originate at the Federal Emergency Management Agency and other federal, state, and local sources and we must broadcast the announcements as provided. There is no time to independently translate those announcements.
- MOME has a contract with LM Language Services for interpretation and translation. We are generally able to obtain translations in three business days.
- Multilingual Outreach: Our broadcast network is MOME's primary means of engaging in outreach during an emergency.
- Bilingual Staff: MOME does not use bilingual staff for emergency translation or interpretation.

E. Licenses and Permits

- MOME issues over 10,000 permits for filming and red-carpet premieres that involve the use of City public property.
- In consultation with MOIA, MOME has determined not to make film permit materials available in the 10 Citywide languages because the users are almost always media and entertainment companies that have English speaking staff.
- For LEP individuals who call MOME with comments about filming activity in their neighborhood, MOME employees will either utilize an available bilingual employee or use Language Line.

- MOME will comply with closed captioning requirements in its televised programs in accordance with Title 47, Part 79 of the Code of Federal Regulations.

F. MOME uses the following criteria to determine which documents are the “Most Commonly Distributed” and will be translated:

- Is the intended audience for distribution of documents at least 150 or more individuals? If yes, move to the next question.
- Is the communication intended for the public at large about a program or public service provided by MOME? If yes analyze the potential audience, and if potential LEP individuals are included, consider translating.
- If the communication is intended for a small segment of the population, are some members of that segment reasonably likely to benefit from translated materials? If yes, translate.

G. Plain Language

- MOME’s Associate Commissioner for Strategic Communications reviews public-facing materials to make sure that they are written in plain language.
- MOME has a review protocol that requires the Associate Commissioner’s review of public-facing materials.

H. Policies and Procedures

- MOME distributed written materials to MOME staff that explains how to use Language Line. MOME also provided I Speak cards to reception staff and the Language Access coordinator explained how and when to use the cards.

I. Notification of Free Interpretation Signage

- I-speak signs are posted.
- MOME has a notice on its website for help seeking interpretation for a film permit application:
<https://www1.nyc.gov/assets/mome/pdf/mome-permit-instructions-2020-02-19.pdf>

J. Languages Beyond the Top 10

- MOME ensures that individuals who speak languages beyond the top 10 are able to access services and communicate with the agency through the procurement of LM Language Services for interpretation services. LM Language Services provides interpretation in over 100 languages.

VI. MOME Resource Planning

A. MOME ensures accessibility to services and information to individuals with LEP by utilizing bilingual staff for some roles that involve direct engagement with the public. In addition to MOME's Language Access Coordinator, the Associate Commissioner for Strategic Communications ensures that public communications are in plain language.

B. Language Service Vendor Contracts

- MOME allocates \$100,000 annually to its contract with Language Line and \$30,000 to its contract with SignNexus (American Sign Language) per fiscal year. We have used only a small fraction of this contract capacity due to lack of demand.

C. Partnerships with Community Based Organizations

- MOME considers local communities when it plans its radio and television programming and it contracts with some non-profit organizations that provide foreign language programming. MOME's also considers language and nationality when it sponsors film festivals, ensuring that the City funds a wide variety of festivals presenting content in different languages.

VII. Training

- A.** The Language Access Coordinator conducts annual training in-person or virtually.
- B.** The staff trained include any employees likely to speak to an LEP individual as part of their work and employees likely to need translations. MOME tracks employees trained by unit.
- C.** Training focuses on how to use LM Language Services to request telephonic interpretation and when to consider and how to request translated materials.

VIII. Continuous Improvement Planning

A. Data collection and monitoring

- MOME's vendor provides monthly reports of usage of telephonic interpretation services and the language requested.
- MOME regularly audits its foreign language broadcast programming to ensure compliance with the Federal Communications Act and the NYC Media Production Handbook.

B. Language Access Complaints

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

- The Language Access Coordinator and team will address all inquiries, requests, and complaints on behalf of MOME.
- The Language Access Coordinator will facilitate resolutions and track response time for reporting purposes.
- Complaints and requests related to language services may be submitted by contacting the Language Access Coordinator at language@media.nyc.gov, by calling 311 (complaints to be forwarded to language@media.nyc.gov), or by calling us at 212-602-7400. MOME established a dedicated email address for complaints at: language@media.nyc.gov. This email address is monitored by Stephanie Roth, Language Access Coordinator.
- Complaint data will be tracked quarterly and MOME will include information about complaints as part of our annual reporting.
- MOME has received no complaints to date.

How members of public can submit language access complaints, questions, and requests	Agency 311 Data (FY2023)	Description of how complaints/requests were addressed
Currently, through 311. However, the public will also be able to submit language access requests through MOME’s website, via email.	# of language access complaints received via 311: 0	N/A
	# of requests for language access services via 311: 0	N/A

IX. Goals and Actions Planning

MOME will post its updated LAIP publicly		Language Access Coordinator	June 30, 2026
MOME will renew its interpretation and translation contract or procure a new one when the LM Language Services contract expires on 8/31/24		Language Access Coordinator	September 1, 2024
MOME will re-train staff on language access requirements		Language Access Coordinator	June 30, 2024
MOME will re-train staff on language access requirements		Language Access Coordinator	June 30, 2025
MOME will re-train staff on language access requirements		Language Access Coordinator	June 30, 2026
MOME will review the LAIP at least once every three years		Language Access Coordinator	June 30, 2026
MOME will re-train staff on language access requirements		Language Access Coordinator	June 30, 2027