

## NYPD LANGUAGE ACCESS IMPLEMENTATION PLAN Revised June 2024

## NYPD LANGUAGE ACCESS IMPEMENTATION 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 (NYPD or the Department) are primarily non-programmatic in nature. The Department impartially enforces the law, protects lives and property, maintains peace, reduces fear and maintains order for the people of New York City.

The Department provides a wide array of direct services to the public, including, but not limited to:

- Investigating reports of crime;
- Investigating motor vehicle collisions, other than property damage only;
- Responding to sick or injured persons;
- Responding to other emergencies reported to "911" as necessary;
- Responding to "311" calls for service as necessary;
- Investigating missing persons;
- Enforcing violations of the law, both criminal and traffic, through summonses and arrests;
- Investigating domestic incidents;
- Mediating disputes;
- Recovering found property;
- Documenting lost property;
- Initiating fingerprint-based employment background checks as requested by residents;
- Issuing firearm licenses;
- Issuing certificates of conduct;
- Providing safety and security services for public schools, public housing developments, and mass transit facilities;
- Providing counterterrorism protection for the city;

- Hosting meetings with members of the community (e.g., "Build the Block" meetings as part of the Neighborhood Policing philosophy); and
- Conducting outreach on various public safety related topics (e.g., domestic violence, crime prevention, etc.).

The New York City Police Department currently issues a total of six licenses, permits, and registrations (LPR). They are:

- Handgun License
- Rifle/Shotgun Permit
- Firearm Dealer's License
- Rifle/Shotgun Dealer's License
- Small Arms Range Designation License
- Special Theatrical Rifle/Shotgun Permit

Given the uncommon nature of these LPRs, none of the forms associated with these functions have been selected for direct translation. However, every LPR issued by the NYPD is accessible to Limited English Proficient (LEP)¹ individuals by translation signage, certified NYPD employees, or the language line contract (audio and/or video). The Parade/Protest Permit may be completed in multiple languages online by the NYC "e-Apply" system prior to being forwarding to the NYPD.

The Department's direct services may be provided in the field or at a police facility (e.g., precinct, housing public service area, transit district). In either case, the language access protocol remains unchanged. Officers are trained at the Police Academy and during in-service training to obtain language services as necessary when working with (LEP) persons. Officers can access interpretation services either by phone through our language line contract or in person with a Department-certified interpreter.

The decision about whether to use the language line or a certified interpreter on the scene is based on the circumstances (e.g., the language required, the availability of live interpreters, the exigency of the situation, etc.). In many cases, with the exceptions of both ongoing investigations and document translations, language services can be efficiently obtained through the language line service. The language line option is readily accessible in the field by means of Department issued smartphones with which all officers are equipped.

<sup>&</sup>lt;sup>1</sup> Limited English Proficient (LEP) persons refers to those persons whose primary language is not English and who are unable to effectively read, write, speak or understand English.

#### II. NYPD's Language Access Policy

The New York City Police Department recognizes the importance of effective and accurate communication between its employees and the communities they serve. Consistent with Title VI of the Civil Rights Act of 1964, the Omnibus Crime Control and Safe Streets Act of 1968, and Local Law 30 of July 2017, it is the policy of the New York City Police Department to take reasonable steps to provide LEP¹ and hearing-impaired persons with timely and meaningful access to the services and benefits that the Department provides to the degree practicable. When performing law-enforcement functions, members provide free language assistance to LEP individuals whom they encounter whenever necessary and whenever a LEP person requests language assistance services.

In the course of their duties, members of the service (MOS) may encounter individuals who are unable to communicate effectively in English. Language barriers can present a significant obstacle for MOS seeking to obtain accurate information from victims and witnesses, and thus hinder the ability to provide police services. In such instances, the Department provides resources and options to both MOS in the field and those working in Department facilities. As with most resources provided by the Department, there are contextual guidelines for when specific options should be utilized, particularly when the accuracy of the information obtained must be balanced by the existence of exigent circumstances. Patrol Guide 212-90: Guidelines for Interaction with Limited English Proficient (LEP) Persons details the options which are available, and how they should be utilized.

Since the passage of Local Law 30 in 2017, the Police Department has made progress in a number of categories in regard to the provision of language access services. Notable accomplishments include:

- Translated several police department forms into the 10 most commonly spoken languages in New York City.
- Translated police department domestic violence prevention brochures into the 10 most commonly spoken languages.
- Published a bulletin apprising all NYPD personnel of the availability of both document and in-person interpretation and outlining the procedure for requesting such services.
- Added video translation capabilities to all the NYPD-issued smartphones, utilizing the Language Line, Inc. contract.
- Added language line access to all CISCO landline telephones located in NYPD facilities.
- Revised the posting entitled, "Free Interpretation Service Available" to include 23 languages, including American Sign Language (ASL).
- Enlisted the services of professional interpreters to provide direct language services at a citywide multi-lingual police reform and reinvention meeting.
- Implemented Language Access Video for all public facing agency staff.
- Make language access data publicly available through an online Language Access Report.

#### III. Language Access Needs Assessment

The Mayor's Office of Operations and Office of Immigrant Affairs along with the Department of City Planning designated 10 languages as the most commonly languages by LEP persons in New York City. These languages – Arabic, Bengali, Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu are the baseline languages in the Mayor's Language Access Policy and Implementation Plan. The New York City Police Department has implemented its language access plan using these 10 baseline LEP languages for New York City and, if needed, languages beyond the 10 (see section "H" below).

The New York City Police Department has historically utilized the U.S. Department of Justice's "Four Factor Analysis" to determine which LEP populations will be served as follows:

Factor 1 – The number or proportion of limited English proficiency persons in the eligible service population: The Department provides services to the entire City of New York and will use the 10 designated languages for its language access policy and plan. Most of the Department's commonly distributed documents will be translated into these languages, as practicable. Language services will continue to be provided as necessary, through the language line and the Language Initiative Program described in Section V – Provision of Language Access Services.

Factor 2 – The frequency with which limited English proficiency persons come into contact with the agency, including the evaluation conducted pursuant to paragraph four of this subdivision: language line usage and 911 call records are the most accurate data regarding the LEP populations that the Department currently serves. Of the 9,282,544 calls to the 911 call center received by the Department in CY 2023, 368,499, or approximately 3.9%, required language services. Of the 911 calls that required language services, 124,546, or 34%, were processed "inhouse" by the Department's Spanish speaking 911 call takers. Also in CY 2023, the language line processed 243,953 total calls requiring services in 99 different languages. The five most commonly requested languages in CY 2023 were Bengali, Cantonese, Mandarin, Russian and Spanish.

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.

English Proficient person (including the consequences of lack of language services or inadequate interpretation or translation): The Department provides a wide array of emergency services that involve life-threatening situations. It is not possible to compose a list of all the situations the police might encounter. Many serious situations to which the police respond involve crime. Providing language services to crime victims is the Department's most important language access service. As per Patrol Guide 212-90, in many exigent circumstances, the Department may need to utilize bilingual community members to assist in providing immediate services to LEP individuals to determine if a crime has occurred, to render or obtain medical treatment, or to apprehend perpetrators of crimes. Once a situation has been stabilized, however, the language services should be secured either through a Department employee certified by the Language Initiative Program or through the Language Line.

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

- All employees are guided by Patrol Guide 212-90, This policy outlines the tools, resources, etc. that are available to facilitate the provision of language services to all New Yorkers.
- Contracts are in place for telephonic and video interpretation through Language Line Services, Inc. and for document translation through Accurate Communications. In CY 2023, the NYPD spent \$14,740 for document translation through Accurate Communications and \$294,735.63 for language translation services for 911 operations through Language Line Services, Inc.
- The smartphones assigned to all officers have been programmed with the language line number, providing access to telephonic and video interpretation services in the field.
- Special CISCO telephones in every precinct, housing police service area, and transit district provide access to the services of the Language Line.
- The Language Initiative Program administered by the Personnel Bureau provides a corps of department employees who have been Department qualified as language interpreters. In CY 2023, the NYPD spent \$126,600 for Foreign Language Assessment through Berlitz Languages.
- The Department consistently posts multi-language signs to advise LEP individuals of the availability of free translation services. These signs are prominently displayed in all publicly accessible Department facilities.
- Primary language identifier activity log inserts, which are also accessible to all uniformed officers on their Department-issued smartphones, enable officers to quickly identify an individual's primary/preferred language.
- The Department posts various items on its website that are translated into foreign languages, including information regarding public/police encounters, crime prevention, and domestic violence. An online translation tool converts the homepage of the website into more than 100 languages.
- Initial and in-service training provided to Department employees explains the available language access tools and resources and how to request and utilize them.

The NYPD will continue to utilize all resources described here (e.g., vendor contracts, bilingual staff) during emergency crises to ensure priority messaging is disseminated to LEP New Yorkers citywide. This crisis communication includes, but is not limited to, use of social media, announcements via public address systems, and use of the news media. One of the NYPD's goals for the 2027 Language Access Implementation Plan is to develop an Emergency Preparedness Plan

that clearly defines the roles and responsibilities of the Language Access Coordinator in a state or national emergency.

## IV. Notice of the Right to Language Access Services

The NYPD has produced a poster to inform the public about available cost-free translation services. The poster is titled, "Free Interpretation Service Available" and is printed in 23 languages. The languages printed on the poster are Albanian, Arabic, Bengali, Cantonese, French, Greek, Haitian Creole, Hebrew, Hindi, Italian, Japanese, Korean, Mandarin, Polish, Punjabi, Portuguese, Russian, Spanish, Tagalong, Ukrainian, Urdu and Yiddish. The poster is displayed in publicly accessible areas of Department facilities (precincts, police service areas, transit districts, tow pounds, property clerk, etc.). An LEP person can to point on the poster to the language they speak, so an NYPD employee can inform the language line interpreter which language is needed. Other than reception areas, most Police Department facilities are not publicly accessible, and therefore signage is not required in those areas. The poster may also be viewed on the Department's public-facing webpage.

All uniformed members of the service are issued a one-page activity log insert—which is also available on officers' smartphone. Like the poster, the insert is designed in a format that allows the LEP person to point to the language they speak, so officers can quickly identify an individual's primary language.

The NYPD's Community Affairs Bureau's subunit, the Immigrant Outreach Unit, that provides outreach to New York City's immigrant population. The Immigrant Outreach Unit Liaisons come from diverse backgrounds and are fluent in various languages which aids in understanding the culture of immigrant populations. Through presentations on Department policies and programs, events, initiatives, incident response, etc., personnel assigned to the unit conduct outreach to immigrant communities citywide. As a number of the unit's members were at one time immigrants themselves, they often fluently speak these languages and are able to form relationships through shared experiences. Through these efforts, the Immigrant Outreach Unit is able to provide critical information to immigrant communities and enhance collaboration between the immigrant population and the Department. If the personnel assigned to the unit do not speak the language needed, Language Line services or a certified employee from elsewhere in the agency are utilized.

In addition, the unit collaborates, coordinates, and hosts large-scale cultural events with the immigrant community across the five boroughs. The Unit engages with the NYPD Police Commissioner's Youth Soccer & Cricket Leagues for youth between the ages of 14 and 19, which gives thousands of immigrant youth the opportunity to participate in a positive sports program, bringing the police and community closer together. The Immigrant Outreach Unit works to build and maintain relationships with community leaders and organizations in emerging immigrant communities. Finally, the Unit coordinates with other Department bureaus and city agencies to address the needs and concerns of the community.

## V. Provision of Language Access Services

## A. Interpretation: Language Line Services

The New York City Police Department provides language services by the phone, in the field, and at police facilities. The Department will continue to utilize its contract for language line services. In doing so, the Police Department is able to provide its vital services (e.g., taking crime complaints, preparing arrest reports, retrieving vouchered property) in over 180 languages. The NYPD Communications Division administers language line operations for the Department. Language Line Services, Inc. is a private vendor that provides interpretation services in over 180 languages. In CY 2023, the Police Department expended approximately \$294,735.63 on language line services across all its contracts (e.g., 911, Domestic Violence, Internal Affairs, etc.) with an average call length of 6.9 minutes. The most common language requested was Spanish, followed by Mandarin Chinese and Russian. The Department currently utilizes Language Line only for telephonic and video interpretation. In CY 2023, the Department expended approximately \$14,740 on document translation by Accurate Communications.

In addition to language line services, the Communications Division has the capacity to provide in-house direct language services by bilingual staff to 911 callers. An analysis of 911 call data shows the demand for Spanish language services is most common. Accordingly, the 911 staff comprises a large number of bilingual Spanish-speaking operators who have been certified as part of the Language Initiative Program.

#### B. Interpretation: Language Initiative Program

The Personnel Bureau administers the Language Initiative Program. The New York City Police Department established the Language Initiative Program in 2002 to create a corps of interpreters who could be called upon in particularly complex cases and to increase the pool of personnel capable of providing language services in less commonly spoken foreign languages for counterterrorism, investigative, or other police purposes. Under this program, members of the Department, both uniformed and civilian, volunteer to use their language skills to improve the efficiency of police operations. Volunteers certified as members of the Language Initiative

Program are tested in their ability by the Berlitz Corporation, a language training and certification company. Volunteers are tested in three categories: reading, writing, and speaking. To be added to the roster for any category, the member must pass at the "Intermediate" level.<sup>2</sup>

Officers' language skills are entered in their personnel records, which are available to Operations Unit personnel and accessible at any time. The majority of requests for interpreters within the Department are made through the Operations Unit. The Personnel Bureau and the

<sup>&</sup>lt;sup>2</sup> Intermediate is defined by Berlitz as, "Comfortable in ordinary social and professional situations involving several native speakers, and can handle an extended phone conversation. Can follow the general meaning of a meeting and ask for explanations as well as express opinions, ideas and demands. A person at this level can deal with more demanding situations such as consulting a

lawyer, CPA, or other professional."

Intelligence Bureau also have the ability to process requests for interpreters. As of May 2024, the Language Initiative Program had certified 5,610 interpreters, providing interpretation services in 109 different languages, including American Sign Language. Lexington School for the Deaf is the vendor that the Department utilizes to certify members of the Department for American Sign Language.

#### C. Translation: Translation of Written Material

Most Department forms are prepared exclusively by Department employees and therefore, do not require translation. Of the Department forms that contain sections for the members of public to complete, most must be referenced later by other parties, including clerical staff, investigators, court staff, etc. which makes completion of these forms in an LEP person's primary language impractical. The public portions of these forms can be completed by NYPD employees using information obtained through an interpreter. Page 2 of Domestic Incident Reports, the personal statement of the complainant, can be completed by the complainant in their primary/preferred language. The Domestic Incident Report is a standardized form issued by New York State.

The Deputy Commissioner, Equity and Inclusion, (DCEI) must grant approval of any materials that are expected to be distributed to the public by any unit within the Department. DCEI examines these new forms and documents (e.g., pamphlets, flyers, notices and posters) and evaluates the suitability of translating these documents into the 10 most commonly spoken languages and any other languages that may be required to reach a particular community. The Department utilizes the services of an outside vendor, Accurate Communications, as the preferred method for document translation. In exigent cases, written material can be translated by a certified employee through the Department's officially sanctioned Language Initiative Program. The translation will then be verified by a second certified member of the Language Initiative Program. Each translation will be written in plain language that is easy for LEP persons to understand. Requests for translation of written material are forwarded to and managed by the Personnel Bureau.

Currently, several forms and brochures that are used on a recurring basis have been translated into the 10 most commonly spoken languages. The criteria for determining which documents are considered "most commonly distributed" and require translation primarily focuses on the nature of the documents being public facing and their frequency of utilization by the public. The Department continues to monitor and assess which documents are most accessed by its diverse audience to ensure priority translation of documents of the highest relevance and demand to the community. Those documents are:

- Consent to Search
- Consent to Submit DNA Sample
- Instructions for Obtaining a Certificate of Good Conduct
- Instructions for Obtaining a Non-Criminal Fingerprint Card
- Request for Copy of Aided Record
- Verification of Incident

#### D. <u>Digital Communications</u>

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. The Department's website can be accessed by an online translation tool in over 100 languages.

In providing language access services and ensuring its availability to all New Yorkers, members of the Department are guided by Patrol Guide 212-90. The procedure includes important definitions, primary language determination, how to request language services (e.g., language line, document translator and in-person interpreter) The procedure is publicly available on the NYPD webpage and may be viewed at the following link: (<a href="https://www1.nyc.gov/site/nypd/about/about-nypd/patrol-guide.page">https://www1.nyc.gov/site/nypd/about/about-nypd/patrol-guide.page</a>).

#### E. Emergency Communications

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. As noted, the Department currently administers a Language Initiative Program, a Selective Certification Program, maintains contracts with Language Line and Accurate Communications, and provides training on language access. Furthermore, the Department is fully accessible to LEP individuals for all purposes, including licenses, permits or registrations. The Language Access Coordinator (LAC) will continue to coordinate with all internal units and external agencies as required to ensure the prompt and effective delivery of language access services to those who live, work, and visit the City of New York.

#### VI. Resource Planning

#### A. Bi-/Multilingual Staff

The Department encourages employees who are not certified, but nonetheless possess language skills, to use their abilities to speak foreign languages in circumstances when use of the Language Line or a certified employee is impractical, including rapidly evolving situations or other exigencies. The use of bilingual employees to provide police services in a foreign language allows the Department to serve the public in a timely and personalized manner, while simultaneously reducing inconvenience to LEP persons.

Generally, non-certified employees may provide interpretation service if they reasonably believe that they have sufficient language proficiency to accurately interpret, given the surrounding circumstances of the LEP person's interaction with the police. If at any time during the interpretation the employee determines that his or her level of language proficiency is insufficient to complete the interpretation, the language line or Language Initiative Program should be used. When determining if they should provide interpretation services, non-certified employees should consider such factors as whether or not the LEP person is in police custody, the gravity of possible outcomes of the interaction, and the exigency of the situation. For instance, absent approval from a uniformed supervisor, a non-certified employee should not perform interpretation for an investigative

assignment, such as a custodial interrogation. Similarly, absent exigent circumstances, officers responding to domestic violence calls for service are required to use certified personnel or language line interpreters to verify the details of the incident.

There are many exigent or emergency circumstances, including determining if a crime has occurred, rendering or obtaining medical treatment, and apprehending perpetrators of crimes, when the Department may need to utilize bilingual community members, including family members, to facilitate the provision of immediate services to LEP individuals. It may also be appropriate to use bilingual members of the public to interpret during a non-emergency encounters if the use of such an interpreter will expedite the delivery of police services without adversely impacting the quality of the services provided. When a bilingual member of the public is readily available and willing to provide language services, the NYPD employee will consider the following four factors to determine if the use of the non-employee interpreter is appropriate:

- The nature and importance of the police services being provided
- The apparent capacity of the interpreter
- The apparent impartiality of the interpreter
- The sensitivity/confidentiality of the topic

If any of these factors suggests that the use of the member of the public to interpret is not appropriate, employees should use language line services or a certified member of the service. During domestic violence situations, members of the service should not use bystanders and family members to interpret, both to preserve privacy and to minimize the risk of a faulty translation, which may result from a fear that family member will be arrested or other personal biases. Bystanders may be used temporarily for translation in life-threatening situations when there is no feasible alternative. Once the situation is stabilized, responding officers must use a bilingual member of the Department or Language Line services to verify the details of the domestic incident before finalizing the call.

The alleged offender in any type of incident, including domestic violence, should not be used as an interpreter. Using an alleged offender to interpret may increase the risk of purposeful mistranslation and give the alleged offender control of the situation. As with all interviews, to the extent possible, the victim and offender should be interviewed separately and in a private setting. Victims may be reluctant to reveal details of an incident if the victims believe the offender may overhear their statements.

As possible victims or witnesses to an incident, children should be interviewed. Absent exigent circumstances, however, a child should not be used as an interpreter for any kind of police incident, including domestic violence. Some words and concepts are difficult for children to understand, let alone translate into another language. Interviewees are not likely to be forthcoming if a child is interpreting and will be especially hesitant to reveal details of a sexual assault to a police officer through a child. The Department prioritizes the use of certified interpreters through the Language Initiative Program for all translations with respect to custodial interrogations and other investigative purposes. The information outlined in this section is codified in policy and may be found in the NYPD Patrol Guide, publicly available online:

(https://www1.nyc.gov/site/nypd/about/about- nypd/patrol-guide.page).

Currently, all precincts, public service areas and transit districts offer language assistance services to LEP persons involved in domestic violence incidents. Officers handling family-related calls for service must now make a determination as to whether language assistance is needed or requested by one of the parties. If so, the officers will use either a certified member of service or a Language Line interpreter, absent exigent circumstances. In addition, officers must document whether such services were needed, and, if so, whether and how they were supplied.

Operations Unit personnel should seek to rely on the foreign language skills of those personnel who are certified as being proficient in the foreign language requested. Preference shall be given to the use of on-duty members. If no certified Department interpreter is available within the facility, a certified Department interpreter who is available within the borough should be sought. In routine or non-emergency situations, the duty captain or commanding officer of the requesting supervisor will review and authorize any request which will result in overtime or recall of an off-duty member of the service. In emergency circumstances, overtime or recall of an off-duty member of the service will be authorized by the Operations Unit supervisor.

When determining whether or not the person requires language assistance services, the member of the service must consider both the nature and importance of the police services being provided in addition to the person's apparent capacity to comprehend and communicate in English. A person who is considered LEP may require interpretation or translation services in one situation, but may not require those services in a different situation. For example, a person with a limited ability to understand English may be able to interact effectively with the police at the scene of a motor vehicle collision, but not be able to interact effectively with the police during a homicide investigation, due to the complex characteristics and intricacies of such an incident. If doubt exists regarding whether a person requires language assistance services, or if the person requests an interpreter, the person should be considered LEP and this procedure complied with. Unit commanders should consider the members' certification or qualification status whenever members are utilized to translate or interpret.

Members being assigned to perform interpretation for investigative assignments (e.g., wiretaps, interviews, debriefings and custodial interrogations) or translation duties should be certified Department interpreters. Whenever interpretation for an investigative assignment or translation skills are required, supervisors should consult the Department list of certified interpreters at the precinct or through the Operations Unit to determine if a certified member is available to perform the needed duties. It is recommended that certified members of the Language zInitiative Program be used for custodial interrogations. However, not every language is represented under the Language Initiative Program. Use of non-certified members for investigative assignments in non-emergency situations must be approved by a uniformed supervisor.

#### B. Language Service Vendor Contracts

The New York City Police Department will continue to utilize its citywide contract for language line services. Language Line Services, Inc. is a private vendor that provides translation services in over 180 languages. Department point-of-service facilities (e.g., precincts, housing police service areas and transit districts, etc.) can access the language line service using specially equipped CISCO telephones available in every precinct, housing police service area, and transit

district. These telephones allow police personnel to obtain immediate interpretation services for LEP individuals. Patrol officers are also equipped with Department cellular phones programmed with Language Line Solutions' application and phone number. These smartphones provide all sworn personnel with the ability to acquire video and telephonic interpretation services in the field.

Any new policies or forms will be evaluated for language access needs by the Office of the Deputy Commissioner, Equity and Inclusion, while new programs or initiatives will be evaluated by the NYPD unit or entity undertaking them. The chart below documents companies the NYPD contracts to provide Language Access services as well as the total award amount of each contract.

# CY 2023 NYPD Language Access Contracts

VENDOR NAME	PROCUREMENT METHOD	PURPOSE OF THE CONTRACT	LANGUAGE(S) PROVIDED BY THE VENDOR	PERIOD OF CONTRACT	TOTAL AWARD AMOUNT OF CONTRACT
ACCURATE COMMUNICATIONS	RENEWAL	DOCUMENT TRANSLATION	99	ANNUAL	\$14,740
BERLITZ LANGUAGES	RENEWAL	FOREIGN LANGUAGE ASSESSMENT	109	ANNUAL	\$126,600
		CAMPAIGN-LANGUAGE TRANSLATION SERVICES FOR 911			
LANGUAGE LINE SERVICES, INC.	RENEWAL	OPERATIONS	99	ANNUAL	\$294,735.63
LEXINGTON SCHOOL FOR THE DEAF	RENEWAL	ASL & DEAF INTERPRETATION	ASL	ANNUAL	\$275.00

## C. Partnership with Community Based Organizations

The NYPD's Community Affairs Bureau Immigrant Outreach Unit provides outreach to New York City's immigrant population. Immigrant Outreach Liaisons come from diverse backgrounds and are fluent in various languages which aids in understanding the culture of immigrant populations. Through presentations on Police Department policies and programs, events, initiatives, incident response, etc., personnel assigned to the unit conduct outreach to immigrant communities citywide. As a number of the unit's members were at one time immigrants themselves, they often fluently speak those languages and are able to form relationships through shared experiences. Through these efforts, the Immigrant Outreach Unit is able to provide critical information to immigrant communities and enhance collaboration between the immigrant population and the Department. If the personnel assigned to the unit do not speak the language needed, language line services or a certified employee from elsewhere in the agency are utilized.

As a supplement to the activity log inserts previously described, the Department has designed a palm card to remind the public of the importance of understanding police officers during police/civilian interactions and to advise them of the ready availability of free interpretation services. In addition, a poster entitled "Free Interpretation Service Available" is visibly displayed in the reception area of all precinct, transit districts and police service area commands, as well as other police facilities accessed by the public (e.g., tow pounds and property clerk offices), ensuring that crime victims and visitors are aware of language access services, including American Sign Language.

In addition, the unit collaborates, coordinates, and hosts large-scale cultural events with the immigrant community across the five boroughs. The unit engages with the NYPD Police Commissioner's Youth Soccer & Cricket Leagues for youths between the ages of 14 and 19, which gives thousands of immigrant youth the opportunity to participate in a positive sports program, bringing the police and community closer together. The Immigrant Outreach Unit works to build

and maintain relationships with community leaders and organizations in emerging immigrant communities. Additionally, the Unit coordinates with other Police Department bureaus and city agencies to address the needs and concerns of the community.

In the fall of 2022, the Community Affairs Bureau implemented an English as a Second Language (ESL) Program. The program is open to people of all ages, was created as a direct result of the increasing migrant population in New York City. The Community Affairs Bureau partners with precincts that cover ESL locations, to effectively tutor Spanish-speaking program participants, in the English language. All ESL tutors are Spanish language certified by the Department. The program helps to increase our positive community relations with the migrant community and helps inform them of crime prevention strategies and rising crime trends. This has become another outlet for community engagement and language access for the Department. Each tutoring session runs for 12 weeks with classes meeting for two hours each week.

## VII. <u>Training</u>

The Chief of Training created a training curriculum for both Police Academy recruits and inservice members based on the Department's Language Access Plan to inform or reacquaint officers of the procedures to follow in obtaining translation services for LEP individuals while in the field or in a Department facility. Training occurs in the Academy for police recruits and during roll-call for in-service members. In CY 2023, 2,315 newly hired recruits and 281 newly hired Police Administrative Aides (PAA) received initial language access training. Roll calls for patrol officers assigned to precinct, police service areas, and transit districts occur at the beginning of each shift or three times within a 24-hour period. Training sessions for other police personnel not assigned to precincts, police service areas, or transit districts are based on the working schedules of each respective unit. In-service training sessions are specifically designed to train personnel in how to identify an individual's primary language, how to use the Department smartphone and dual hand-set/CISCO telephone, how to use telephonic/video interpreters, and how to properly use certified and non-certified interpreters. In-service training sessions concerning elements of the Language Access Plan and existing policy are conducted any time policies or procedures are amended.

Public facing civilian employees also receive training regarding the Department's Language Access Plan during their initial orientation training and semi-annually thereafter through the command level training program. All training is conducted by police academy instructors and/or a particular command's training officer/training supervisor.

## VIII. <u>Continuous Improvement Planning</u>

#### A. Data Collection and Monitoring

Some records of the language services provided by the Department are obtained through billing statements received by Language Line Services. Others are maintained by the Chief of Personnel regarding the use of police personnel for translation or document translation services. Both these sources of data are monitored and reviewed periodically. In addition, complaints that are received from members of the public (e.g., 311, Internal Affairs Bureau, etc.) are reviewed to monitor the efficacy of the Department's Language Access Program.

#### B. 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 translation/interpretation services to persons with limited English proficiency;
- Failure to provide a sign language interpreter/auxiliary aids and services to a hearing impaired person.

Individuals who are denied adequate language access services by the New York City Police Department may file a complaint with the NYPD Internal Affairs Bureau 24 hours per day, 7 days per week via email, postal mail, phone, or in person. The public can access information on how to file a complaint at the following web page.

https://www.nyc.gov/site/nypd/about/about-nypd/language-access-plan.page

The Internal Affairs Bureau is responsible for tracking and resolving complaints pertaining to language access. If an allegation is substantiated, it will result in the subject officer receiving instruction, retraining, and/or discipline. In CY 2023, a total of 22 language access complaints were received through all complaint channels and were disposed as follows: Filed: 1, Exonerated: 1, Unfounded: 6, Substantiated: 6, Unsubstantiated: 8.

## IX. Goals and Action Planning

In order to advance language access services and improve upon current policy and practice, the Department has pledged to complete the following milestones in advance of the 2027 revision of its Language Access Implementation Plan.

Milestone	<b>Entity Responsible</b>	<b>Target Completion Date</b>
Strategic deployment of officers	Language	2027
from the academy based on	Access	
language fluency	Coordinator	
Emergency Preparedness	Language	2027
Deployment Plan with defined role	Access	
for Language Access Coordinator	Coordinator	
Establish a process or partnership to	Language	2027
utilize community based	Access	
organizations to assist with	Coordinator	
language accessibility		