

# He NYPD LANGUAGE ACCESS PLAN Revised August 2022

# NYPD LANGUAGE ACCESS IMPEMENTATION PLAN FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS

### I. Language Access Coordinator

The Police Commissioner has designated the Deputy Commissioner, Equity and Inclusion, to serve as the Department's Language Access Coordinator (LAC). The LAC supervises the Department's language access plan and institutes various measures to monitor the success of the plan. The language access plan is reviewed and updated as necessary. The plan is publicly available on the Police Department's website at the following web address: https://www1.nyc.gov/site/nypd/about/about-nypd/language-access-plan.page. As of the revision date of this document, the designated Language Access Coordinator is Wendy Garcia, Deputy Commissioner, Equity and Inclusion.

## II. Mission

The mission of the New York City Police Department is to enhance the quality of life in New York City by working in partnership with the community to enforce the law, preserve peace, reduce fear, and maintain order. The Department is committed to accomplishing its mission to protect the lives and property of all people of New York City by treating every individual with courtesy, professionalism, and respect, and to enforce the laws impartially, fighting crime both through deterrence and the relentless pursuit of criminals.

## **Direct Services**

The services of the New York City Police Department are primarily non-programmatic in nature. The Department impartially enforces the law, protects lives and property, maintains peace, reduces fear and maintains order for the people of New York City.

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

- Investigating reports of crime;
- Investigating motor vehicle collisions, other than property damage only;
- Responding to sick or injured persons;
- Responding to other emergencies reported to "911" as necessary;
- Responding to "311" calls for service as necessary;
- Investigating missing persons;
- Enforcing violations of the law, both criminal and traffic, through summonses and arrests:
- Investigating domestic incidents;

- Mediating disputes;
- Recovering found property;
- Documenting lost property;
- Initiating fingerprint-based employment background checks as requested by residents;
- Issuing firearm licenses;
- Issuing certificates of conduct;
- Providing safety and security services for public schools, public housing developments, and mass transit facilities;
- Providing counterterrorism protection for the city;
- Hosting meetings with members of the community (e.g., "Build the Block" meetings as part of the Neighborhood Policing philosophy)
- Conducting outreach on various public safety related topics (e.g., domestic violence, crime prevention, etc.).

The Department's direct services may be provided in the field or at a police facility (e.g., precinct, housing public service area, transit district). In either case, the language access protocol remains the same. Officers are trained at the Police Academy and during in-service training to obtain language services as necessary when working with limited English proficiency (LEP) persons. Typically, officers utilize the Language Line contract, which provides language services by phone, or certified members of the Department to provide language services in person.

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

#### III. Goal of the NYPD's Language Access Plan

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 LEP<sup>1</sup> 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. It is the policy of the Department to inform members of the public

<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.

that language assistance services are available, free of charge, to all New Yorkers. The Department provides these services as part of its community policing and enforcement efforts.

## IV. Language Access Accomplishments and Progress on Goals

## **Accomplishments**

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:

- Translating several police department forms into the 10 most commonly spoken languages in New York City (as described in section VI(g) of this document);
- Translating police department domestic violence prevention brochures into the 10 most commonly spoken languages;
- Publishing a bulletin apprising all NYPD personnel of the availability of both document and in-person interpretation and outlining the procedure for requesting such services:
- Adding video translation capabilities to all the NYPD-issued smartphones, utilizing the Language Line contract;
- Adding Language Line access to all CISCO landline telephones located in NYPD facilities;
- Revising the posting entitled, "Free Translation Service Available" to include 23 languages, including American Sign Language (ASL) (see section VI(f) below);
- Enlisting the services of professional interpreters to provide direct language services at a citywide multi-lingual police reform and reinvention meeting.

#### **Progress on Goals**

In the 2018 Language Access Plan, the Police Department outlined three milestones intended for completion prior to the triennial revision of the plan. Each milestone has been completed either on or ahead of schedule.

Milestone	Completed	Target
Test and certify all officers in the Immigrant Outreach	2019	2019
Unit who identify proficiency in a foreign language.		
Test and certify all 911 call-takers who identify	2019	2020
proficiency in a foreign language.		
Translate the NYPD "Crime Stoppers" website in the 10	2020	2021
designated LEP languages.		
https://crimestoppers.nypdonline.org/		

## V. <u>LEP Population Assessment</u>

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

Factor 1 – Demographic Analysis: Pursuant to local law 30 enacted in July 2017, the Mayor's Office of Immigrant Affairs and the Mayor's Office of Operations identified ten languages as the designated citywide LEP languages: Spanish, Chinese, Russian, Korean, Bengali, Haitian Creole, Polish, Arabic, Urdu and French. The Department provides services to the entire City of New York and will use the ten designated languages for its language access policy and plan. Most of the Department's commonly distributed documents will be translated into these languages, as practicable. Language services will continue to be provided as necessary, through Language Line and the Language Initiative Program described in Section IV – Service Provision Plan.

Factor 2 – LEP data tailored specifically to the agency: Language Line usage and 911 call records are the most accurate data regarding the LEP populations that the Department currently serves. Of the 8,309,011 calls to the 911 call center received by the Department in CY 2020, 280,091, or approximately 3.4%, required language services. Of the 911 calls that required language services, 142,050, or 51%, were processed "in-house" by the Department's Spanish speaking 911 call takers. Also in CY 2020, the Language Line processed 169,197 total calls requiring services in 99 different languages, a 36% increase in Language Line calls compared to CY 2017. Analysis of both the 911 call data and Language Line billing records indicates that the three most commonly requested languages in CY 2020 were Spanish, Mandarin Chinese, and Russian.

The Department determines the frequency with which LEP individuals come in contact with the language access program by conducting periodic examinations of Police Department records. In addition, the Department reviews billing statements from language service vendors regularly.

Factor 3 – Nature and Importance of Services: The Police Department provides a wide array of emergency services that involve life-threatening situations. It is not possible to compose a list of all the situations the police might encounter. Many serious situations to which the police respond involve crime. Providing language services to crime victims is the Department's most important language access service. In many exigent circumstances, the Department may need to utilize bilingual community members to assist in providing immediate services to LEP individuals to determine if a crime has occurred, to render or obtain medical treatment, and to apprehend perpetrators of crimes. Once a situation has been stabilized, however, the language services should be secured either through a Department employee certified by the Language Initiative Program or through Language Line.

Factor 4 – List of Resources Designated for Language Assistance Services:

• All employees are guided by Patrol Guide procedure 212-90, "Guidelines for Interactions with Limited English Proficient (LEP) persons." This policy outlines the tools, resources, etc. that are available to facilitate the provision of language services to all New Yorkers.

- Contracts are in place for telephonic and video interpretation through Language Line Solutions and for document translation through Accurate Communications.
- The smartphones assigned to all officers have been programmed with the Language Line number, providing access to telephonic and video interpretation services in the field.
- Special dual-handset/CISCO telephones in every precinct, housing police service area, and transit district provide access to the services of Language Line.
- The Language Initiative Program administered by the Chief of Personnel provides a corps of department employees who have been certified as language interpreters.
- Since September 2009, the Department has posted multi-language signs to advise LEP individuals of the availability of free translation services. These signs are prominently displayed in all publicly accessible Department facilities.
- Primary language identifier activity log inserts, which are also accessible to all uniformed
  officers on their Department-issued smartphones, enable officers to quickly identify an
  individual's primary/preferred language.
- The Department posts various items on its website that are translated into foreign languages, including information regarding public/police encounters, crime prevention, and domestic violence., An online translation tool converts the homepage of the website into more than 100 languages.
- Initial and in-service training provided to Department employees explains the available language access tools and resources and how to request and utilize them.

## VI. Provision of Language Access Services

#### A. Language Line Services

The New York City Police Department provides language services by the phone, in the field, and at police facilities. The Department will continue to utilize its contract for Language Line Services. In doing so, the Police Department is able to provide its vital services (e.g., taking crime complaints, preparing arrest reports, retrieving vouchered property, etc.) in over 100 languages. The NYPD Communications Division administers Language Line operations for the Police Department. Language Line Solutions is a private vendor that provides interpretation services in over 180 languages. In CY2020, the Police Department expended approximately \$794,000 on Language Line services across all its contracts (e.g., 911, Domestic Violence, Internal Affairs, etc.) with an average call length of 10 minutes. The most common language requested was Spanish, followed by Mandarin Chinese and Russian. The Department currently utilizes Language Line only for telephonic and video interpretation. Documents translation is provided by another Department vendor, Accurate Communications or, in exigent circumstances, by employees that have been certified through the Language Initiative Program. In CY2020, the Police Department expended approximately \$12,500 on document translation by Accurate Communications.

In addition to Language Line services, the Communications Division has the capacity to provide in-house direct language services by bilingual staff to 911 callers. An analysis of 911 call data shows the demand for Spanish language services is most common. Accordingly, the 911 staff comprises a large number of bilingual Spanish-speaking operators who have been certified as part of the Language Initiative Program pursuant to the milestone set forth in the NYPD's 2018 Language Access Plan.

#### B. Language Initiative Program

The Chief of Personnel administers the Language Initiative Program. The New York City Police Department established the Language Initiative Program in 2002 to create a corps of interpreters who could be called upon in particularly complex cases and to increase the pool of personnel capable of providing language services in less commonly spoken foreign languages for counterterrorism, investigative, or other police purposes. Under this program, members of the Department, both uniformed and civilian, volunteer to use their language skills to improve the efficiency of police operations. Volunteers certified as members of the Language Initiative Program are tested in their ability by the Berlitz Corporation, a language training and certification company. Volunteers are tested in three categories: reading, writing, and speaking. To be added to the roster for any category, the member must pass at the "Intermediate" level.<sup>2</sup>

Officers' language skills are entered in their personnel records, which are available to Operations Bureau personnel and can be accessed at any time. The majority of requests for interpreters within the Department is made through the Operations Bureau; The Personnel Bureau and the Intelligence Bureau also have the capability to process requests for interpreters. As of May 2021, the Language Initiative Program had certified 4,127 interpreters, providing interpretation services in 93 different languages, including American Sign Language.

# C. Use of Non-Certified Interpreters

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

Generally, non-certified employees may provide interpretation service if they reasonably believe that they have sufficient language proficiency to accurately interpret, given the surrounding circumstances of the LEP person's interaction with the police. If at any time during the interpretation the employee determines that his or her level of language proficiency is insufficient to complete the interpretation, the Language Line or Language Initiative Program should be used.

<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."

When determining if they should provide interpretation services, non-certified employees should consider such factors as whether or not the LEP person is in police custody, the gravity of possible outcomes of the interaction, and the exigency of the situation. For instance, absent approval from a uniformed supervisor, a non-certified employee should not perform interpretation for an investigative assignment, such as a custodial interrogation. Similarly, absent exigent circumstances, officers responding to domestic violence calls for service are required to use certified personnel or Language Line interpreters to verify the details of the incident.

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

- a. The nature and importance of the police services being provided
- b. The apparent capacity of the interpreter
- c. The apparent impartiality of the interpreter
- d. The sensitivity/confidentiality of the topic

If any of these factors suggests that the use of the member of the public to interpret is not appropriate, employees should use Language Line services or a certified member of the service.

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

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

As possible victims or witnesses to an incident, children should be interviewed; absent exigent circumstances, however, a child should not be used as an interpreter for any kind of police incident, including domestic violence. Some words and concepts are difficult for children to understand, let alone translate into another language. Interviewees are not likely to be forthcoming

if a child is interpreting and will be especially hesitant to reveal details of a sexual assault to a police officer through a child.

Police Department prioritizes the use of certified interpreters through the Language Initiative Program for all translations with respect to custodial interrogations and other investigative purposes. The information outlined in this section is codified in policy and may be found in the NYPD Patrol Guide, publicly available online: (https://www1.nyc.gov/site/nypd/about/about-nypd/patrol-guide.page).

### D. Domestic Violence

In 2015, the Department launched a pilot program in three precincts to enhance language assistance services to LEP persons involved in domestic violence incidents. The initiative was expanded in 2016 to additional precincts and was expanded citywide to all precincts in November 2017. Officers handling family-related calls for service must now make a determination as to whether language assistance is needed or requested by one of the parties. If so, the officers will use either a certified member of service or a Language Line interpreter, absent exigent circumstances. In addition, officers must document whether such services were needed, and, if so, whether and how they were supplied.

# E. Evaluation of Language Access Needs of the Service Population

The Mayor's Office of Operations and Office of Immigrant Affairs with the Department of City Planning designated ten languages as the most commonly spoken LEP languages in New York City. These languages -- Spanish, Chinese, Russian, Korean, Bengali, Haitian Creole, Polish, Arabic, Urdu and French are the baseline languages in the Mayor's Language Access Policy and Implementation Plan. The New York City Police Department will implement its language access plan using the ten baseline LEP languages for New York City and, if needed, languages beyond the ten (see section "H" below). Based on the findings from "Factor 2 – LEP data tailored specifically to the agency" noted in section V above, the three most commonly spoken languages in New York City are Spanish, Mandarin Chinese, Russian.

#### F. Primary Language Identifiers

The NYPD has produced a poster to inform the public about available cost-free translation services. The poster is titled, "Free Translation Service Available" and is printed in 23 foreign languages. The poster is posted in publicly accessible areas of Police Department facilities in precincts, police service areas, transit districts, tow pounds, property clerk, etc.). An LEP person can to point on the poster to the language he or she speaks, so an NYPD employee can inform the Language Line interpreter which language is needed. Other than reception areas, most Police Department facilities are not publicly accessible, and therefore signage is not required in those areas. The poster may also be viewed on the Police Department's public-facing webpage.

All uniformed members of the service are issued a one-page activity log insert—which is also available on officers' smartphone. Like the poster, the insert is designed in a format that allows

the LEP person to point to the language he or she speaks, so officers can quickly identify an individual's primary language.

## G. Translation of Written Material

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 his/her 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, posters, etc.) and evaluates the suitability of translating these documents into the ten most commonly spoken languages and any other languages that may be required to reach a particular community. The Department utilizes the services of an outside vendor, Accurate Communications, as the preferred method for document translation. In exigent cases, written material can be translated by a certified employee through the Department's officially sanctioned Language Initiative Program. The translation will then be verified by a second certified member of the Language Initiative Program. Each translation will be written in plain language that is easy for LEP persons to understand. Requests for translation of written material are forwarded to and managed by the NYPD Chief of Personnel.

As of the last Language Access Plan report, published in 2018, several forms and brochures that are used on a recurring basis have been translated into the ten most commonly spoken languages. They are:

- Consent to Search
- Consent to Submit DNA Sample
- Instructions for Obtaining a Certificate of Good Conduct
- Instructions for Obtaining a Non-Criminal Fingerprint Card
- Domestic Violence Outreach Brochures

#### H. Community Outreach

The NYPD's Community Affairs Bureau has a subunit—called the Immigrant Outreach Unit—that provides outreach to New York City's immigrant population. Through presentations on Police Department policies and programs, events, initiatives, incident response, etc., personnel assigned to the unit are tasked with conducting outreach to immigrant communities citywide. Because a number of the unit's members were at one time immigrants themselves, they often speak foreign languages and are able to form relationships through shared experiences. Through these efforts, the Immigrant Outreach Unit is able to provide critical information to immigrant

communities and enhance collaboration between the immigrant population and the Police Department. If the personnel assigned to the unit do not speak the language needed, Language Line services or a certified employee from elsewhere in the agency are utilized.

In addition, the unit organizes the NYPD Police Commissioner's Youth Soccer & Cricket Leagues for youths between the ages of 14 and 19, which gives thousands of immigrant youth the opportunity to participate in a positive program, bringing the police and community closer together. The Immigrant Outreach Unit works to build and maintain relationships with community leaders and organizations in emerging immigrant communities. Additionally, the Unit coordinates with other Police Department bureaus and city agencies to address the needs and concerns of the community. In 2019 the Police Department completed a milestone identified in 2018 Language Access Plan testing all of the Language Initiative Program's members who identified proficiency in a foreign language and certifying them as interpreters.

#### I. Website

The Police Department posts various items on its website that are translated into foreign languages, including information regarding public/police encounters, crime prevention, and domestic violence. The Department's website can be accessed by an online translation tool in over 100 languages.

#### J. Policies and Procedures

In providing language access services and ensuring its availability to all New Yorkers, members of the Police Department are guided by Patrol Guide procedure 212-90, "Guidelines for Interactions with Limited English Proficient (LEP) persons." The procedure includes important definitions, primary language determination, how to request language services (e.g., Language Line, document translator, in-person interpreter, etc.). The procedure is publicly available on the NYPD webpage and mav be viewed following link: at the (https://www1.nyc.gov/site/nypd/about/about-nypd/patrol-guide.page).

#### K. Licenses, Permits, and Registrations

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

- Handgun License
- Rifle/Shotgun Permit
- Firearm Dealer's License
- Rifle/Shogun Dealer's License
- Small Arms Range Designation License
- Special Theatrical Rifle/Shotgun Permit
- Press Pass Credential
- Parade/Protest Permit
- Sound Device Permit

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

# VII. Training

The Chief of Training created a training curriculum for both police academy recruits and 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 CY2020, 1,507 newly hired recruits and 106 newly hired Police Administrative Aides (PAA) received initial language access training. Roll calls for patrol officers assigned to precinct, police service areas and transit districts occur at the beginning of each shift or three times within a 24-hour period. Training sessions for other police personnel not assigned to precincts, police service areas or transit districts are based on the working schedules of each respective unit. In-service training sessions are specifically designed to train personnel in how to identify an individual's primary language, how to use the Department smartphone and dual hand-set/CISCO telephone, how to use telephonic/video interpreters, and how to properly use certified and non-certified interpreters. In-service training sessions concerning elements of the Language Access Plan and existing policy are conducted any time policies or procedures are amended.

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

# VIII. Record Keeping and Evaluation

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

## IX. Resource Analysis and Planning

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

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

Any new policies or forms will be evaluated for language access needs by 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.

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

As a supplement to the activity log inserts previously described, the Department has designed a palm card to remind the public of the importance of understanding police officers during police/civilian interactions and to advise them of the ready availability of free interpretation services. In conjunction with our partners, the Department began circulation of the cards in 2018. It is anticipated that some 60,000 cards were distributed in 2018, and each year thereafter.

In addition, a poster entitled "Free Translation Service Available" is visibly displayed in the reception area of all precinct/transit district/police service area commands, as well as other police facilities accessed by the public (e.g., tow pounds, property clerk offices, etc.), ensuring that crime victims and visitors are aware of language access services, including American Sign Language.

# XI. Language Access Complaints

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.

The Internal Affairs Bureau is responsible for tracking and resolving complaints pertaining to language access. If an allegation is substantiated, it will result in the subject officer receiving instruction, retraining, and/or discipline. In CY2020, a total of 15 language access complaints were received through all complaint channels and were disposed as follows: Exonerated: 5, Unfounded: 4, Unsubstantiated: 5, Pending: 1.

## XII. Emergency Preparedness

The NYPD will continue to utilize all resources described here (e.g., vendor contracts, bilingual staff, etc.) during emergency crises to ensure priority messaging is disseminated to LEP New Yorkers citywide. This crisis communication includes, but is not limited to, use of social media, announcements via public address systems, and use of the news media.

# XIII. <u>Implementation Plan Logistics</u>

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

#### XIV. Milestones

In order to advance language access services and improve upon current policy and practice, the Police Department has pledged to complete the following milestones in advance of the 2024 revision of its Language Access Implementation Plan.

Milestone	Entity Responsible	<b>Target Completion Date</b>
Implement annual language	Language Access	2022
access training video for all	Coordinator	
public-facing agency staff		
Translate the NYPD	Language Access	2023
Language Access Plan into	Coordinator	
Spanish, Chinese, and Russian		
Make data on language access	Language Access	2024
publicly available on the	Coordinator	
internet		