

SBS Language Access Implementation Plan

Agency name: The Department of Small Business Services (SBS)

Language Access Coordinator name: Michael Silver

Language Access Coordinator title: Chief Performance Officer

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Signatures

Michael Silver

June 6, 2024

Michael Silver
Language Access Coordinator and Chief Performance Officer, SBS

Date

Kevin D. Kim

June 7, 2024

Kevin D. Kim
Commissioner, SBS

Date



careers
businesses
neighborhoods

Section 1. Agency mission and services

The NYC Department of Small Business Services (SBS) helps unlock economic potential and create economic security for all New Yorkers by connecting New Yorkers to good jobs, creating stronger businesses, and building thriving neighborhoods across the five boroughs.

SBS makes it easier for businesses in New York City to start, operate and grow by providing direct assistance to business owners, fostering neighborhood development in commercial districts, and linking employers to a skilled and qualified workforce.

SBS runs the city's NYC Business Solutions Centers, Industrial Business Solutions Providers, and Workforce1 Career Centers. SBS also provides grants and services to support the growth of local community and economic development organizations throughout the city and oversees the largest network of Business Improvements Districts (BIDs) in the country. SBS also administers the city's Minority and Women-owned Business Enterprise (M/WBE) Program, supports M/WBEs to contract with the city, and cultivates business growth in key sectors.

The agency interacts with the public in a variety of ways, both directly and through contracted vendors including the following:

Careers

We prepare and help adult New Yorkers (18 years or older) find jobs and help businesses find the talent they need by:

- Operating the city's Workforce1 Career Centers, assisting a high daily volume of individuals
- Developing job search skills through resume and interview workshops
- Training local residents to acquire skills in growing fields through specialized training programs
- Screening and connecting jobseekers to employers with open positions

Businesses

We help businesses start, operate, and grow in New York City by:

- Operating the city's NYC Business Solutions Centers to assist a high volume of entrepreneurs through free services and one-on-one support
- Connecting entrepreneurs to free resources ranging from business courses to legal services
- Helping entrepreneurs navigate government rules and regulations
- Helping entrepreneurs apply for funding to launch or grow a business
- Guiding minority and women-owned businesses (M/WBEs), Emerging Business Enterprises (EBEs), and Locally Based Enterprises (LBEs) through city-certification
- Helping M/WBE firms build capacity and compete for city contracts
- Supporting certification to expand opportunities for minority and women entrepreneurs to access government contracts and grow their businesses
 - It is critical that access to this program be available to business owners with Limited English Proficiency (LEP).

Neighborhoods

We work with community-based organizations to build vibrant neighborhoods where New Yorkers can shop, work, and live by:

- Overseeing the largest network of Business Improvement Districts (BIDs) in the country, which delivers more than \$192 million in additional services throughout the five boroughs
- Offering training, tools, and one-on-one assistance to local community-based organizations
- Administering grant programs to strengthen and revitalize commercial districts
- Working with community partners to identify local commercial district needs and plan targeted solutions

Section 2. Agency language access policy

Adhering to Local Law 30, SBS's policy and goal is to deliver our programs for New Yorkers and businesses with the highest possible quality of customer service, with the highest degree of operational flexibility and the lowest possible ongoing cost of operations. Given SBS's presence in neighborhoods across the city, and the proportion of LEP persons in New York City, we must ensure that they can access our services in an inclusive and equitable way despite language barriers. SBS will ensure we deliver on this policy by incorporating a variety of strategies further enumerated in this plan. SBS is responsible for providing inclusive and equitable access to its programs and services via this plan.

Section 3. Language access needs assessment

The SBS plan incorporates the following analysis, which is a combination of the Four Factor Analysis and data collected from services provided from the agency.

1. Department of Justice Factor 1: *The number of LEP persons served or encountered in the eligible service area*

Using the American Community Survey from 2022, the following results show the number of LEP adults in New York City.

	Population	Percent
Speak English "well"	558,431	48%
Speak English "not well"	441,342	38%
Speak English "not at all"	158,773	14%
Total	1,158,546	

The total of 1.1 million adults represents 22% of the adult population in New York City. Since there are no estimates for LEP businesses in NYC, SBS will apply 22% to all other areas of service.

2. Department of Justice Factor 2: *The frequency with which LEP individuals come in contact with the program*

SBS has LEP language support request tracking in place at all Workforce1 Career Centers. There is a regular influx of LEP persons into all our walk-in facilities, multiple-language web content, and service descriptions. In Fiscal Year 2023, the Workforce1 Career Centers handled more than 4,800 requests for assistance in languages other than English. The Division of Business Services assisted more than 1,900 businesses with preferred languages other than English, including more than 580 calls handled on the Small Business Hotline in Fiscal Year 2023.

3. Department of Justice Factor 3: *The nature and importance of the program, activity, or service provided by the program*

SBS's programs and services generate positive and lasting outcomes for New York City's jobseekers, businesses, entrepreneurs, and commercial corridors. Therefore, our programs and services are an important part of the city's strategy for equitable economic development. SBS's programs and services are not required or mandatory.

To ensure these program services are delivered in an inclusive and equitable manner, SBS's Language Access Plan has dedicated resources, tactics, and protocols to deliver our programs and services to LEP New Yorkers within the constraints of the agency's services.

4. Department of Justice Factor 4: *Resources available to the Agency*

- Financial resources available for vendor contracts for telephonic interpretation, in-person interpretation, and document translation
- Easy-to-understand multilingual signages in conspicuous locations about the availability of free interpretation services and "I Speak" cards at all physical locations
- Center staff's Foreign Language Skills
- City-wide Volunteer Language Bank
- Translatable content on website
- Data, resources, and maps from Department of City Planning including [Population Map Viewer](#)
- SBS Staff's Foreign Language Skills

In addition, after evaluating the customer requests from across the agency, we have determined the top ten languages most requested in order of frequency are as follows:

- Spanish
- Mandarin-Chinese
- Cantonese-Chinese
- Korean

- Russian
- Haitian (French) Creole
- Fujianese-Chinese
- French
- Polish
- Bengali

Based on the above analysis, no supplemental languages beyond the designated citywide languages are necessary to provide services to meet the goals of LL30. As needed and based on the unique needs of a target population, SBS is committed to including additional languages to ensure our customers can access all our programs and services. For example, SBS has translated documents into Wolof, Greek, and Yiddish and has translated documents in 27 languages for large scale capital access programs.

Section 4. Notice of the right to language access services

- Easy-to-understand multilingual signages in conspicuous locations about the availability of free interpretation services and “I Speak” cards at all physical locations
- Center staff’s Foreign Language Skills
- City-wide Volunteer Language Bank
- Translatable content on website
- Direct Outreach
 - SBS has a team dedicated to raising awareness of SBS’s services across the five boroughs.
 - The team speaks English, Spanish, Mandarin, Fuzhounese, Cantonese, and Bengali.
 - Depending on community need, the team leverages collateral available in top 10 languages and more.
- SBS Communications leverages social media campaigns to provide information about programs and services in 10+ languages

Section 5. Provision of language access services

A. Interpretation:

- SBS provides different options for assisting LEP individuals. Below are the three ways customers can be assisted:
 - For walk-in customers at center locations:
 - Customer indicates his or her preferred language from the *Free Interpretation Service Available* poster. If the preferred language is not available on the poster, our telephonic interpretation vendor will be utilized.
 - The telephonic interpretation is available through our contract with Voiance/Cyram, who provides interpretation in 200+ languages.

- Once the preferred language has been indicated, an “I Speak” card will be completed on the customer’s behalf. The customer should carry the I Speak card with him/her and show it at any New York City government agency.
- For In-Person Interpretation:
 - Professional interpreters are available through our vendor Accurate Communication. SBS teams seeking interpretation should complete the request form and email the vendor.

B. Translation:

- Each division in the agency has identified the most commonly distributed collateral by volume and has prioritized translation by the frequency of need.
- All documents and the translated versions are available for download and use on SBS’s internal Sharepoint platform. In addition, some frequently requested materials are available on SBS’s public facing website (“Outreach Flyers”).
- The identification of essential public documents and marketing materials for translation is ongoing as our services evolve to meet the needs of the market and communities served.
- As an example of translated documents is the collateral used by SBS’s NYC Business Express Service Team (NYC BEST) team. The team assists businesses with licensing and permitting, understanding City rules and requirements, and avoiding/reducing fines and violations. Their collateral has been translated into 10 languages.
- Other divisions have prioritized documents for translation in a similar fashion.
- For new translations, the agency has a process outlined below:
 - Through the division’s Language Access Coordinator, SBS staff will work with the Communications team to identify outreach purpose, the target audience, and distribution plan.
 - Define the following items for all documents, posts, or presentations to be translated:
 - SBS Division or Center requesting translation
 - From which language(s) to which language(s)
 - Deadline or due date for finished product
 - Number of words to be translated
 - Incorporation of the principles of plain language using guidance from the Mayor's Office publication on Easy-to-Read NYC Guidelines for Clear and Effective Communication (<https://www.nyc.gov/html/adulted/downloads/pdf/easy-to-read-nyc.pdf>) and plainlanguage.gov

C. Digital Communication

SBS provides services in multiple languages at its Workforce1 Career Centers and NYC Business Solutions Centers. SBS also promotes all its programs in multiple languages across various SBS platforms:

- Social media channels, including Twitter and Facebook

- Direct email marketing
- Advertising in ethnic media publications (as resources allow)
- Printed marketing collateral
- Website (translation tool)

Emergency Preparedness and Response:

SBS has incorporated an Emergency Preparedness Plan to ensure that LEP individuals are able to access language services during an emergency. This plan includes ensuring that documents are translated and signage in public locations is conspicuous, has appropriate multilingual translation, LEP identification tools are available at emergency sites, interpreters can be contacted and utilized, and other translation resources and vendors are available in the event of an emergency. SBS is not a first responder agency in an emergency and all of our public facing services can be performed remotely. In the event of an emergency, SBS could deploy the following protocols, depending on the circumstances of the event:

- Equip our Small Business Hotline with details about the emergency – as available from NYCEM or other agencies – to help address incoming questions. The team answering inquires via the Hotline has access to telephonic interpretation.
- As necessary, deploy our Emergency Response Unit (ERU) after the emergency phase of an event is complete. The ERU team assists businesses restore operations after an emergency by working closely with NYC Emergency Management and other key New York City agencies. This small team has access to telephonic interpretation and in-person interpretation.
- Amplify NYC information and statements about the emergency (Notify NYC, NYC Emergency Management, City Hall) on social media and to our database of small businesses which already includes translated versions.
- Deploy our Mobile Unit which can help provide direct services to communities through this mobile command center. Any staff member deployed with the vehicle has access to telephonic interpretation and in-person interpretation.

Should there be a sudden increase in language access needs for customers beyond the 10 designated languages, SBS would deploy the following plans:

- Leverage telephonic interpretation: the current contract with Voiance/[Cyracom](#) supports 200+ languages, SBS would lean heavily on this resource to work directly with customers.
- Employ expedited translation services for documents: SBS would work with current contractual vendor Geneva to have documents translated with their expedited service. This quick turnaround will require additional budget (25% upcharge by Geneva) but SBS will identify funding across its divisions to ensure this will be supported.
- Utilize in-person interpretation as needed: for events or communication that requires human interpretation, SBS would work with its contracted vendor to provide the services.

In an emergency, SBS would ensure our core materials are available in all languages. As relevant to the emergency, SBS would generate new content in the 10 designated languages with consideration to the needs of impacted communities. This was done successfully during the COVID-19 pandemic. All

approved collateral and translated versions are available on our internal shared drive. Some examples of this collateral include the following items:

- MWBE certification brochure
- General business services brochure
- NYC BEST flyer
- Legal Assistance flyer
- Rat Mitigation flyer

Section 6. Resource planning

A. Bi-/Multilingual Staffing

- SBS primarily relies on contracted vendors to deliver services directly to the public. Those vendors prioritize hiring staff with language skills to best serve the public and meet the needs of customers with LEP.
- SBS has a team dedicated to raising awareness of SBS’s services and works with various communities directly. The team speaks English, Spanish, Mandarin, Fuzhounese, Cantonese, and Bengali.
- SBS will continue working to hire staff with various language abilities.
- SBS will reach out to staff with self-identified language skills to create a database of volunteers.

B. Language Services Vendor Contracts

SBS has contracts with the following vendors:

Vendor name	Procurement method	Purpose of the contract	Language(s) provided by the vendor	Period of contract	Total award amount of contract
Voiance/ Cyracom	Task Order	Telephonic interpretation	200+	7/1/2018 - 6/30/2025	\$13,575.00
Geneva	Task Order	Document translation	200+	7/1/2018 - 6/30/2025	\$365,250.00
Accurate	Task Order	In-Person translation	Spanish, Korean, Chinese, Russian, Italian, Haitian Creole, Arabic, Bengali, French, Polish, plus 160+ others	7/1/2018 - 6/30/2025	\$237,150.00

C. Partnerships with CBOs

SBS has worked in various ways with Community Based Organizations (CBOs) to ensure services and translated materials are culturally competent and accessible to New Yorkers, including the following examples.

- SBS created the Asian American Business Taskforce and Latino American Business Taskforce to help reach those communities and ensure we are providing culturally relevant services to LEP customers.
- SBS partners with trusted community organizations to help reach non-English speaking communities through Mobile Unit events, roundtable conversations, and other presentations.
- SBS has prioritized reaching all of NYC's "Littles" communities (i.e. Little Manilla, Little Haiti, etc.)
- In Fiscal Year 23, SBS piloted a language access initiative to work with local non-profits to improve SBS's translation and immigrant community outreach. SBS contracted with six non-profits – Asian American Federation (Korean, Chinese), APNA (Urdu), African Communities Together (French), Chhaya (Bengali), Life of Hope Center (Haitian Creole), WEC NYC (Arabic) – to conduct a quality assurance analysis of SBS translation, improve existing materials, develop a glossary of term/phrases for future use, and convene roundtables with ethnic media and local non-English speaking business owners to conduct an in-language media and outreach roundtable.
- SBS's procurement team and the contract manager monitors the contacting details.

Section 7. Training

Agency Staff: Each division at SBS has a lead Language Access Coordinator who is responsible for interfacing directly with program managers within the division. The divisional Language Access Coordinators will ensure that relevant staff within each division are fully aware of SBS's language access resources, policies, and procedures.

The Agency Language Access Coordinator will conduct trainings at least once each year with the divisional Language Access Coordinators and other relevant staff. In addition, as needed, ad hoc training will be provided to new staff as they are on-boarded or as circumstances change. Relevant staff will include any individuals overseeing programming or contracts with vendors that provide direct services. Training will include: city demographics data, resources to evaluate the demographics for targeted populations or geographies and historical data on programs.

All trainees will be made aware of the online resources that SBS provides to allow for individuals to self-serve and have access to all language access resources. These include the following resources, among others:

- "I Speak" cards and "Free Interpretation" posters to download
- How to access professional interpretation and translation services
- Walk-In Center resources

- Mayor's Office of Immigrant Affairs publication on Easy-to-Read NYC Guidelines for Clear and Effective Communication and details from the Plain Language Action and Information Network plainlanguage.gov
- Department of City Planning's Population Map viewer
- Department of City Planning's other data tools such as Population Fact Finder

The Agency Language Access Coordinator will ensure that the divisional Language Access Coordinators have the materials and resources needed and will join trainings as necessary, and that trainings are happening as planned.

Vendor Staff: For divisions at SBS that have contracted vendors that provide services, the Language Access Coordinator will ensure that program managers within the division who manage these contracts are fully versed in the resources available. As necessary, the Language Access Coordinators will provide training to vendor staff on SBS's language access policies and procedures.

Section 8. Continuous improvement planning

A. Data Collection and Monitoring

SBS is committed to systematically collecting and analyzing data on services provided and will ensure that access to these services is not hindered because of limited English proficiency.

Some examples of the data SBS collects with the most volume include:

- Preferred language for entrepreneurs at NYC Business Solutions Centers
- Requests for interpretation by jobseekers at Workforce1 Career Centers
- Languages utilized via telephonic interpretation

SBS has determined through analysis that current language access plans and policies meet the needs of these customers; however, SBS will continually evaluate and adjust our approach as needed.

B. Language Access complaints

SBS will monitor and respond to all public complains about Language Access through both 311 and its website via "contact us" portals and provide responses within 14 business days.

For calls via 311, SBS will receive the inquiry via email from the 311 Agency Analyst, which will be directed to the Language Access Coordinator overseeing the program or initiative. They will work with program teams to address the issue. For inquiries submitted electronically, division Language Access Coordinators will be notified and will work with program teams to address the inquiry.

As appropriate, constituents will be informed by SBS or vendor staff about how their complaint was resolved.

311 inquiries for Language Access will be tracked and logged by the Language Access Coordinator and all inquiries will be reported annually as part of the Annual Report.

Section 9. Goals and actions planning

SBS is committed to systematically collecting and analyzing data on services provided and will ensure that access to these services is not hindered because of limited English proficiency.

Currently, SBS believes our approach sufficiently serves our populations; however, we are open to improving our services and the delivery thereof with language access in mind.

The following goals have been identified to address the current and possible future challenges:

Need	Cause	Language Access Goal	Milestone	Stakeholders	Timeline
Expand translation provided via virtual platforms – Stage 1	The proliferation of services delivered virtually since 2020 requires better functionality from vendors	Provide seamless service delivery to customers with LEP	DCAS procurement of new vendor with this scope	SBS, DCAS	June 2024–July2024
Expand translation provided via virtual platforms – Stage 2	The proliferation of services delivered virtually since 2020 requires better functionality from vendors	Provide seamless service delivery to customers with LEP	Establish new task order for SBS	SBS, vendor	July 2024–Augst 2024
Evaluate new technologies for translations – Stage 1	New technology may represent a leap ahead of our current tools for providing services to those with LEP	Machine learning or other new technology may become a useful tool to speed up delivery of translated materials, improve accuracy, and reduce cost	Evaluate tools available	SBS, OTI, MOIA	August 2024–October 2024
Evaluate new technologies for translations – Stage 2	New technology may represent a leap ahead of our current tools for providing services to those with LEP	Machine learning or other new technology may become a useful tool to speed up delivery of translated materials, improve accuracy, and reduce cost	Identify any tools to procure	SBS, OTI, MOIA	November 2024–January 2025
Refresher Training for SBS staff	N/A	Ensure SBS staff has current and complete information on language access tools	Host training for all Language Access Coordinators within divisions, Deputy Commissioners, and any other stakeholders	SBS	June-July 2024

Leverage existing staff language ability – Stage 1	N/A	Create a database of language volunteers	Encourage Staff to update profiles with language proficiency in NYCAPS	SBS	June-July 2024
Leverage existing staff language ability – Stage 2	N/A	Create a database of language volunteers	Collect data and reach out to managers	SBS	August -September 2024
Leverage existing staff language ability – Stage 3	N/A	Create a database of language volunteers	Finalize database	SBS	October 2024
Procurement of new vendors for language access – Stage 1	Existing contracts expiring	Have resources in place to provide language access	Establish method, timeline, goals, and roles	SBS	June-July 2024
Procurement of new vendors for language access – Stage 2	Existing contracts expiring	Have resources in place to provide language access	Draft solicitations	SBS	August-September 2024
Procurement of new vendors for language access – Stage 3	Existing contracts expiring	Have resources in place to provide language access	Feedback on solicitation	SBS, MOIA	September 2024
Procurement of new vendors for language access – Stage 4	Existing contracts expiring	Have resources in place to provide language access	Finalize solicitations and release	SBS	October – November 2024
Procurement of new vendors for language access – Stage 5	Existing contracts expiring	Have resources in place to provide language access	Contracting and registration	SBS	December 2024 – May 2025
Asylum Seeker access to services – Stage 1	The influx of migrants to NYC has created new challenges for our jobseeker system	Ensure all populations, especially those with the most need, can access services	Evaluate current delivery model	SBS, MOIA	July 2024
Asylum Seeker access to services – Stage 2	The influx of migrants to NYC has created new challenges for our jobseeker system	Ensure all populations, especially those with the most need, can access services	Determine gaps in delivery as needed	SBS, MOIA	July-August 2024

Asylum Seeker access to services – Stage 3	The influx of migrants to NYC has created new challenges for our jobseeker system	Ensure all populations, especially those with the most need, can access services	Identify new solutions to meet gaps as needed	SBS, MOIA	August–Sept 2024
Asylum Seeker access to services – Stage 4	The influx of migrants to NYC has created new challenges for our jobseeker system	Ensure all populations, especially those with the most need, can access services	Launch new solutions as needed	SBS, MOIA	October 2024–January 2025