

Name and title of Language Access Coordinator:

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I. Agency mission and background

The Department of Consumer Affairs (DCWP) protects and enhances the daily economic lives of New Yorkers to help create thriving communities. DCWP licenses and regulates more than 75,000 businesses in more than 50 industries. The Agency strives to create a culture of compliance in the marketplace by performing onsite inspections of businesses and enforcing license regulations, weights and measures regulations and the NYC Consumer Protection Law. DCWP also provides mediation and restitution for consumer complaints. Through the Office of Labor Policy & Standards (OLPS), the Agency enforces various workplace laws, including Paid Safe and Sick Leave, Fair Workweek, and protections for independent contractors under the Freelance Isn't Free Act by investigating complaints, conducting proactive investigations and recovering restitution for workers. DCWP's Office of Financial Empowerment (OFE) focuses on initiatives that educate, empower and protect residents and neighborhoods with low incomes so they can improve their financial health and build assets by providing free financial counseling and coaching at NYC Financial Empowerment Centers, increasing access to safe and affordable financial products and services and encouraging the use of NYC Free Tax Prep, which helps eligible New Yorkers file their taxes for free and claim valuable tax credits.

II. Agency language access policy and goals

DCWP believes that limited English proficiency (LEP) should not be a hindrance to accessing the services and information the Agency provides. Without language access services consumers would not be able to file complaints or know their consumer rights; business owners would not be able to navigate the DCWP rules and regulations that govern commerce and the workplace in New York City, nor would they be able to apply for a DCWP license; and workers would not be able to make inquiries and file complaints. DCWP's language access implementation plan is intended to help staff provide excellent customer service to ensure meaningful access for LEP New Yorkers. To ensure meaningful access for LEP New Yorkers, DCWP:

1. Translates those documents most commonly distributed to the public into the 10 designated citywide languages (**English, Arabic, Bengali, French, Haitian Creole, Italian, Korean, Polish, Russian, Simplified Chinese, Spanish, Traditional Chinese, and Urdu.**);
2. Provides free interpretation services, including telephonic interpretation in up to 170 languages; and
3. Utilizes multilingual signage and collateral to inform New Yorkers of the availability of such free interpretation services.

DCWP's language access implementation plan describes how DCWP intends to provide such language access services. DCWP has a language access coordinator who will facilitate the implementation of the language access plan agency wide and serve as a resource to the Agency on all language access issues.

III. LEP population assessment

The following LEP population assessment is based on the Four-Factor Analysis issued by the U.S. Department of Justice. The factors are as follows:

1. The number or proportion of LEP persons in the eligible service population;
2. The frequency with which LEP individuals come into contact with the Agency;
3. Explanation of the nature and importance of the program/services for the LEP person requiring language assistance;
4. The resources available to the Agency and the cost of providing language services.

Factor 1: Number or proportion of LEP persons in the eligible Service population

DCWP's eligible service population is all New York City residents. According to the Department of City Planning's analysis of the 2018 American Community Survey, there are approximately 8.4 million New York City residents¹. Approximately 48 percent of New Yorkers over the age of 5 spoke a language other than English at home². Of that cohort approximately 22 percent reported speaking English "less than well"³.

Factor 2: Frequency with which LEP Individuals come into contact with the agency

In CY2019, DCWP provided over the phone interpretation via Language Line 3,228 times. Spanish comprised 57.6 percent of telephonic interpretation sessions followed by Mandarin (22.2 percent), Cantonese (4.2 percent), Arabic (3.9 percent), Bengali (3.6 percent), Korean (3.1 percent), Russian (2.9 percent), French (0.5 percent), Haitian Creole (0.3 percent), and Hindi (0.2 percent). Applicants for premises-based business licenses have the option to indicate a language preference for inspections on their application. In CY2019, 10 percent of all applicants indicated a preference. Top choices are Spanish (36.04 percent), Mandarin (27.25 percent), Korean (15.07 percent), Cantonese (7.67 percent), Arabic (3.4 percent), Russian (2.97 percent), and Bengali (1.9 percent).

Factor 3: Nature and Importance of the program/services for the LEP person

DCWP enforces key consumer protection, workplace, and business licensing laws. It is DCWP's goal to provide meaningful access to its services and information to LEP New Yorkers. Without the availability of language access services, LEP New Yorkers could feel discouraged about filing complaints and seeking restorative justice or be unaware of how to identify and report unlawful

¹ <https://www1.nyc.gov/site/planning/planning-level/nyc-population/nyc-population.page>

² https://www1.nyc.gov/assets/planning/download/pdf/planning-level/nyc-population/acs/soc_2018acs1yr_nyc.pdf

³ Id.

conduct; LEP business owners could be unaware of the laws that apply to their business and of how to run a compliant establishment.

Factor 4: Resources available to the agency and the cost of providing language access services

DCWP had the following contracts in place to provide language access services in FY2019:

- Accurate Communication (American sign language interpretation and in-person interpretation): \$4,479.52
- Language Line Services (telephone interpretation and document translation): \$40,139.35
- Geneva Worldwide (transcription): \$4,734.80
- Eriksen Translation, Inc. (document translation): \$5,466.32

IV. Provision of language access services

A. Translation

Local Law 30 of 2017 (LL30) requires that DCWP identify and translate those documents most commonly distributed (MCD) to the public into the designated citywide languages (DCL). Beginning on July 1, 2020, LL30 requires that DCWP also translate those documents MCD for the purposes of issuing a license, permit, or registration.

1. Criteria for Identifying Most Commonly Distributed Documents

Each year, the language access coordinator (LAC) will identify the MCD documents by first compiling a list of documents that were made available to the public by DCWP in the previous year, and then calculating the total number of downloads from DCWP's website and the total quantities distributed for each document. The top five documents, in terms of combined total number of downloads and quantities distributed, will be considered the MCD documents and translated into the DCL. Documents designated by the LAC as MCD will continue to be made available in the DCL on DCWP's website, until they reach the end of their "shelf life."

DCWP licenses more than 50 industries. All applicants for a DCWP license must submit a basic license application (BLA), but that is where the uniformity in the licensing process ends. Because each industry has unique licensing requirements, some categories may require an applicant to pass an examination before a license can be issued, while others may require an applicant to submit several supplemental forms in addition to the BLA.

Each year, the LAC will identify the five DCWP license categories with the highest volume of licenses issued and designate these five categories as the MCD licenses. Affixed to each DCWP new and renewal license application is an application guide. Therefore, the MCD documents for purposes of issuing a DCWP license are the applications guides. The LAC will ensure that the application guides for the MCD licenses are translated into the DCL and made available on DCWP's website. The application guides provide new and renewal applicants with step-by-step

instructions on how to complete the license application. The application guides will also inform applicants that free interpretation services are available upon request. As of May 6, 2020, DCWP's top five license categories are:

1. Home Improvement Contractor (14,033)
2. Tobacco Retail Dealer (6,032)
3. Secondhand Dealer – General (4,214)
4. Sightseeing Guide (3,789)
5. Laundries (3,738)

These five categories represent 40 percent of all licenses issued by DCWP. In CY2019, 90 percent of applicants that indicated a preference for business inspections to be conducted in a language other than English applied for one of these licenses. Additionally, since the application process for all DCWP licenses begins with the BLA, LEP New Yorkers will be able to use the translated application guides for assistance with completing the BLA for any DCWP license. All document translations are completed by a professional translation vendor. All public-facing materials are reviewed by DCWP's Communications & Marketing division for plain language before submitting files for translation.

2. Website Translation

DCWP's website, nyc.gov/DCWP, is supported by NYC.gov and features Google Translate functionality for web page content. DCWP coordinates translation and posting of PDFs in languages other than English.

B. Interpretation

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

When a customer indicates the need for an interpreter, DCWP staff will immediately determine the person's native language and offer Language Line as an interpretation service. While the precise method for assisting an LEP customer may vary by Division, all follow the protocol outlined below.

1. **Determine which language is required.** Language desktop signage and wall posters are posted in high traffic areas to assist staff and customers. Additionally, DCWP makes language identification cards available to frontline staff.

If staff encounters difficulties identifying customers' primary language, they will engage Language Line who should be able to assist.

2. **Use Language Line as the primary tool for providing interpretation services.** Staff is given a Quick Reference Guide with Client ID Number, Access Codes, and basic instructions. A copy of the Quick Reference Guide is also posted on the agency's intranet.
3. **At the direction of a division director or direct supervisor, staff may ask a colleague within their division to assist with on-site interpretation on a voluntary basis; however, staff should engage Language Line first before asking a staff member to interpret.**
4. **If a customer brings an interpreter, make sure the customer knows that free interpretation services are available.** Never allow minors to serve as interpreters.
5. **Staff are encouraged to bring any language issues that arise to the attention of their Division Director and the LAC.**

C. Notification of free interpretation signage

Wall posters and desktop signage (please see appendix) promoting free interpretation assistance are in high traffic areas where DCWP serves the public, including:

- DCWP Licensing Center at 42 Broadway, Lobby
- Collections and Settlement Unit Divisions, 42 Broadway, 5th floor
- Consumer Services, OLPS, Legal Divisions, 42 Broadway, 9th floor
- NYC Small Business Support Center in Jamaica, Queens

Field Inspectors carry a handout promoting free interpretation (please see appendix).

D. Emergency activation

Senior Leadership assesses the situation, determines what information needs to be relayed to the public, and assigns Communications & Marketing staff to draft communications.

Communications & Marketing determines the best ways to convey information to the public, which would include 311, the DCWP website nyc.gov/DCWP, and social media channels.

- NYC.gov features web page translation functionality.
- 311 can provide assistance in up to 170 languages via Language Line.

V. Training

- A copy of the new language access implementation plan and the quick reference guide is available to all DCWP staff via the agency's intranet.
- The LAC will review the language access implementation plan with Division Directors.
- During new hire orientation, the Training and Employee Relations Specialist will provide an initial introduction to language access resources prepared by the LAC.
- An annual email from the LAC reminding staff of the importance of Language Access, where to find the language access plan, quick reference guide, dual-use headsets, and who the LAC is.
- Subsequent training will be provided by Division Directors for job-specific responsibilities.

VI. Record keeping and evaluation

DCWP will maintain records of interactions with LEP customers.

- Requests for interpretation are noted on Language Line reports (invoices), including Call Detail (language, time, date, duration) and Call Detail Summary Report.
- Requests for professional document translation and in-person interpretation are in the Financial Information Tracking System (FITS), including estimate and final invoice.
- The LAC will review and evaluate language access data and information annually, including a review of qualitative feedback from Division Directors. Assessment of this information will include general monitoring of the language access plan for LL 30 compliance; review of any complaints received; and, when necessary, recommendations to update the implementation plan to address emerging issues.

VII. Resource analysis and planning

- DCWP's Human Capital Division will continue to explore expanding job titles to include multilingual capacity in the preferred job skills category.
- DCWP's Human Capital Division will collaborate with Division Directors seeking to hire staff at DCWP to make certain that potential candidates are notified of DCWP's and the City's commitment to multilingual capacity for public-facing positions.
- Based on feedback from the LAC, DCWP's Finance Division will work to maintain, expand, and renew contracts for over-the-phone interpretation, document translation, and on-site/in-person interpretation, as necessary.

VIII. Outreach and public awareness of language access services

- DCWP will advertise the availability of language access services on its website nyc.gov/DCWP, via social media, in press releases and public materials. Staff who

conduct community outreach will include general information about the availability of language access services at the Department.

- DCWP public awareness campaigns and major initiatives are, and will continue to be, translated into multiple languages.
- DCWP will continue to ask stakeholders and partners if translation or interpretation is needed to serve target populations. If DCWP is hosting an event and interpretation is needed, DCWP will either make multilingual staff available to deliver the presentation or procure professional interpretation services. If DCWP is invited to co-host an event with an organization, DCWP will either make multilingual staff available to deliver the presentation or procure professional interpretation services if the host organization is unable to provide interpretation.
- DCWP will continue to distribute translated materials to support outreach efforts to target populations.

IX. Language Access complaints

- DCWP's LAC will receive, track, and respond to complaints about language access via 311 and social media.
- The LAC will review complaints and update the implementation plan to address emerging issues, as necessary.

X. Implementation plan logistics

Language Access Goal	Milestones	Responsible Staff	Deadline
Finalize the agency list of covered LPRs and accompanying material, as well as MCDs.	<ul style="list-style-type: none"> • Identify the top five most commonly distributed licenses. DCWP will translate the application and renewal packets for these five categories. Example application packet: https://www1.nyc.gov/assets/dca/downloads/pdf/businesses/LicensingChecklist-TobaccoRetailDealer-English.pdf • Identify the top five most commonly distributed documents. 	<ul style="list-style-type: none"> • Language Access Coordinator • Communications & Marketing • General Counsel • Licensing 	March 2, 2020
Audit and update/create any new supporting materials (in English) that will be required to make LPRs accessible (this may include instructions or information about getting help with interpretation)	<ul style="list-style-type: none"> • Post language desktop signage and wall posters promoting free interpretation assistance in high traffic areas to assist staff and customers. • Post signage and add to website that licensing materials for the five categories have been translated into the 10 languages. 	<ul style="list-style-type: none"> • Language Access Coordinator • Communications & Marketing • Division Heads 	June 1, 2020

Conduct a plain language review of materials to be translated	<ul style="list-style-type: none"> Communications & Marketing division will review all identified materials for plain language and revise as needed prior to translation. 	<ul style="list-style-type: none"> Language Access Coordinator Communications & Marketing General Counsel Licensing 	June 1, 2020
Finalize plain language updates of materials to be translated		<ul style="list-style-type: none"> Language Access Coordinator Communications & Marketing 	June 1, 2020
Submit materials to translation vendor		<ul style="list-style-type: none"> Language Access Coordinator Communications & Marketing Administration (Finance) 	June 1, 2020
Review translated materials, where applicable		<ul style="list-style-type: none"> Language Access Coordinator Communications & Marketing 	June 15, 2020
Make materials available to the public.		<ul style="list-style-type: none"> Language Access Coordinator Communications & Marketing External Affairs Licensing 	June 15, 2020
Plan for how staff will be made aware of the multilingual LPR materials	<ul style="list-style-type: none"> Post copy of updated language access implementation plan and necessary guides on the agency's intranet Provide presentation on language access resources during new hire orientation Annual email to Agency on all information regarding language access Division heads to provide division-specific training to staff 	<ul style="list-style-type: none"> Language Access Coordinator Division Heads Licensing Administration (Human Capital) 	June 15, 2020

Exhibits

Wall Poster



English	We will help you in the language you prefer. Ask for free interpretation assistance at Reception.
Spanish	Le ayudaremos en el idioma que prefiera. Solicite asistencia de interpretación sin costo en la Recepción.
Arabic	سنساعدك باللغة التي تفضلها. اطلب مساعدة للترجمة الفورية مجاناً من مكتب الاستقبال.
Bengali	আমরা আপনার পছন্দের ভাষায় আপনাকে সাহায্য করবো। রিসেপশন-এ বিনামূল্যে আপনার পছন্দের ভাষায় ব্যাখ্যা সহায়তার জন্য বলুন।
Simplified Chinese	我们能使用您偏好的语言为您提供协助， 请至接待区询问关于免费口译协助事宜。
Traditional Chinese	我們能使用您偏好的語言為您提供協助。 請至接待區詢問關於免費口譯協助事宜。
Haitian Creole	N ap ede ou nan lang ou pito a. Mande èd entèpretasyon gratis nan Biwo Resepsyon an.
Italian	Vi aiuteremo nella vostra lingua preferita. Chiedete l'assistenza gratuita di un interprete alla reception.
Korean	원하시는 언어 서비스를 제공해 드립니다. 접수처에서 무료 통역 서비스를 요청하십시오.
Russian	Мы можем предоставить вам помощь на языке, который вы предпочитаете. Для получения бесплатных услуг перевода обращайтесь в регистратуру (Reception).

Inspector Handout/Desktop Signage

Interpretation Service Available

English Translation:

Hello, I'm an inspector from the City's Department of Consumer Affairs. Please point to your language, and I will call an interpreter for the inspection. Language assistance is free.

Arabic  عربي مرحبا انا مفتش من ادارة المدينة لعلاقات المستهلك. الرجاء الاشارة الي لغتك و سأصل بمترجم للتفتيش. خدمة مساعدة اللغة مجانية.	Korean  한국어 안녕하세요, 저는 시에서 운영하는 소비자 보호위원회 소속 조사원입니다. 본인의 사용가능 언어를 말씀해주시면 조사절차를 위해 통역사에게 연락을 취하도록 하겠습니다. 통역서비스는 무료입니다.
Bengali  বাংলা হ্যালো, আমি সিটি'র উপ ভোক্তা বিষয়ক অধিদপ্তরের(Department of Consumer Affairs)একজন পরিদর্শক। অনুগ্রহ করে আপনার ভাষা নির্দেশ করুন, এবং আমি পরিদর্শনের জন্য একজন দোভাষীকে ডাকব। ভাষা সহায়তা বিনামূল্যে ভাষা সহায়তা দেওয়া হয়।	Mandarin  國語 您好，我是本市消费者事务局的视察员。请您指出您所用的语言，我会请一位口译员来协助视察。翻译服务是免费的。
Cantonese  廣東話 您好，我是本市消費者事務局的視察員。請您指出您所用的語言，我會請一位口譯員來協助視察。翻譯服務是免費的。	Polish  Polski Witam, jestem inspektorem z Miejskiego Wydziału Do Spraw Klientów. Proszę wybrać język, po czym zadzwonię po tłumacza w celu przeprowadzenia kontroli. Pomoc tłumacza jest bezpłatna.
Farsi  فارسي سلام، من بازرس اداره امور مصرف کنندگان شهر هستم. لطفاً زبان مورد نظر خود را نشان دهید تا من برای انجام بازرسی با یک مترجم تماس بگیرم. خدمات ترجمه رایگان میباشد.	Portuguese  Português Olá, sou um inspetor do Departamento de Defesa do Consumidor da Cidade. Por favor, indique seu idioma e chamarei um intérprete para a inspeção. A assistência com idiomas é gratuita.
French  Français Bonjour, je suis Inspecteur au Département des consommateurs de la ville. Veuillez m'indiquer votre langue et j'appellerai un interprète pour l'inspection. Le service d'interprétation est gratuit.	Punjabi  ਪੰਜਾਬੀ ਸਤ ਸ੍ਰੀ ਅਕਾਲ, ਮੈਂ ਸ਼ਹਿਰ ਦੇ ਉਪਭੋਗਤਾ ਮਾਮਲਿਆਂ ਦੇ ਮਹਿਕਮੇ ਵਿੱਚ ਇੱਕ ਜਾਂਚਕਰਤਾ ਹਾਂ। ਕਿਰਪਾ ਕਰਕੇ ਆਪਣੀ ਭਾਸ਼ਾ ਦੀ ਚੋਣ ਕਰੋ ਅਤੇ ਮੈਂ ਜਾਂਚ ਲਈ ਇੱਕ ਦੁਭਾਸ਼ਿਏ ਨੂੰ ਬੁਲਾ ਲਵਾਂਗਾ। ਭਾਸ਼ਾ ਸਹਾਇਤਾ ਮੁਫਤ ਹੈ।
Haitian Creole  Kreyòl Alo, mwen se yon enspektè Depatman Zafè Konsomatè Vil la. Tanpri lonje dwèt ou sou lang ou pale a, epi m ap rele yon entèprèt pou enspeksyon an. Gen èd nan lang ki gratis.	Russian  Русский Здравствуйте! Я инспектор городского Управления по делам потребителей. Укажите свой язык, и мы вызовем переводчика для проведения проверки. Перевод предоставляется бесплатно.
Hebrew  עברית שלום, אני מבקר משעם מחלקת הצרכנות בעירייה. אודה לכם אם תוכלו להצביע על השפה שלכם כדי שאוכל לקרוא למתורגמן לצורך הביקורת. השימוש במתורגמן אינו כרוך בתשלום.	Spanish  Español Hola, soy inspector del Departamento de Asuntos del Consumidor de la ciudad. Señale su idioma y llamaré a un intérprete para la inspección. El servicio es gratuito.
Hindi  हिंदी नमस्ते, मैं शहर के उपभोक्ता संबंधित मामले विभाग में एक निरीक्षक हूँ। कृपया अपनी भाषा इंगित करें और मैं निरीक्षण हेतु आपके लिए अनुवादक को बुला लूँगा। भाषा सहायता निःशुल्क है।	Thai  ไทย สวัสดี ข้าพเจ้าเป็นผู้ตรวจราชการจากแผนกผู้บริโภคร่วมพันธ์ของเทศบาล กรุณาชี้บอกภาษาของคุณ และข้าพเจ้าจะโทรศัพท์ติดต่อส่วนสำหรับการสืบสวนนี้ การใช้นี้ไม่คิดค่าบริการ
Italian  Italiano Buongiorno, sono un ispettore del Dipartimento Municipale per la Tutela dei Consumatori. Per favore indichi la sua lingua, in modo che io possa chiamare un interprete che mi affianchi durante l'ispezione. L'assistenza dell'interprete è gratuita.	Urdu  اُردو ہیلو، میں شہر کے محکمہ امور صارفین کا ایک افسر ہوں۔ براۓ مہربانی اپنی زبان کی طرف اشارہ کیجئے، اور میں تفتیش کیلئے ایک مترجم کو بلاؤں گا۔ زبان کی مدد مفت ہے۔
Japanese  日本語 こんにちは。市消費者事務局の調査員です。ご使用の言語をご指定いただければ、調査の際に通訳をご用意いたします。言語のアシスタンスは無料でご利用いただけます。	Vietnamese  Tiếng Việt Xin chào, tôi là thanh tra của City's Department of Consumer Affairs (Bộ Đặc trách Vấn đề Người Tiêu Dùng của Thành phố). Vui lòng chỉ vào ngôn ngữ của quý vị, tôi sẽ gọi một phiên dịch đến trợ giúp việc kiểm tra. Dịch vụ trợ giúp ngôn ngữ được cung cấp miễn phí.