

Name and title of Language Access Coordinator:

Kristen Johnson, Language Access Coordinator

I. Agency name and agency language access coordinator

NYC Department of Consumer and Worker Protection

Kristen Johnson, Language Access Coordinator

<https://www1.nyc.gov/site/dca/about/dca-language-access-plan.page>

II. Agency mission and background

The Department of Consumer and Worker Protection (DCWP) protects and enhances the daily economic lives of New Yorkers to help create thriving communities. DCWP licenses and regulates more than 45,000 businesses in more than 40 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.

III. 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.

IV. Agency language access accomplishments and progress on goals from previous LAIP

Since LL30's inception (July 1, 2017), DCWP has accomplished the following:

- Designated an official Language Access Coordinator for the Agency.
- Created an internal language bank of multilingual agency staff.
- Posted language access posters and desktop signage in customer service areas.
- Created a translated handout for use by inspectors in the field to inform businesses of the availability of language line if they prefer their inspection in a language other than English.
- Renewed contract with Language Line to provide over-the-phone interpretation in up to 170 languages and document interpretation.
- Renewed contract with Accurate Communications to provide in-person interpretation in up to 250 languages.
- Contracted with Accurate Communications to provide in-person American Sign Language interpretation.
- Translated new educational materials targeted to consumers, workers, and businesses.
- Identified and translated the most commonly distributed documents for 2019.
- Provided over the phone interpretation via Language Line 3,228 times in CY2019.
- Provided over the phone interpretation via Language Line 2,749 in CY2020.
- Provided in-person interpretation in a language other than English at 149 outreach events in 2019 to ensure all New Yorkers are educated on their rights and available City resources.
- In 2020, 124 outreach events were conducted in a language other than English.
- Integrated information about DCWP's language access services into general education and outreach efforts.
- Created a [COVID-19 online hub](#) with resources and information that are constantly updated and professionally translated in the 10 citywide languages, as well as a [Spanish](#) version of the hub. It includes information about business reopening, workplace rights, licensing updates, financial resources like tax prep, financial counseling, stimulus payments, and students loans, and funeral home consumer tips. DCWP shares new publications and translations with MOIA and other partners to help disseminate information to the public, as well as through DCWP's social channels. DCWP's outreach team also shares this information during outreach events, such as presentations,

business visits, and webinars, which have been conducted in multiple languages including Spanish, Nepali, Chinese, Bengali, Urdu, Arabic, Korean, and more.

- Created a “Cease Debt Collection” Communication Letter: Instructions and Template in 12 different languages to help New Yorkers who are facing financial hardship due to COVID-19 to request that debt collection agencies stop contacting them temporarily about debt.
- Launched numerous multilingual public awareness campaigns to ensure that DCWP reaches and educates as many New Yorkers on City programs, resources, and laws. DCWP’s annual tax campaign is translated into 12 languages.
- Promulgated new rules to protect LEP consumers from deceptive debt collection practices. As part of the rules, DCWP created a Glossary of Common Debt Collection Terms in 12 languages to help consumers better understand the debt collection process. DCWP released a report titled Lost in Translation: Findings from Examination of Language Access by Debt Collectors, which highlights the lack of language access services for LEP consumers by debt collection agencies.

2020 Goal	Update
Identify and translate the top 5 most commonly distributed documents for 2019.	Completed.
Identify and translate the top 5 most commonly distributed licenses for 2019.	The licenses have been identified and we are working on meeting the translation requirement.
Provide annual language access refresher training to all staff, which is tracked by Human Capital.	The Human Capital team will include a refresher on LL30 in the annual Mandatory Customer Service Training.
Update internal language bank of multilingual agency staff.	In progress.

V. 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 well³."

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). DCWP's enforcement team accounted for nearly 25 percent of the Language Line requests, followed by Adjudication (6.1 percent), Collections (1.2 percent), Legal (0.6 percent), and Communications (0.3 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 conduct; LEP business owners could be unaware of the laws that apply to their business and of how to run a compliant establishment. For example, DCWP coordinates numerous Business Education Days in commercial corridors throughout the year to visit businesses and distribute educational resources in businesses' preferred language so that they are aware of the laws that apply to their business and can avoid violations during inspections.

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.

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 FY2020:

Contracted Vendors

- Language Line (telephonic and document translation): \$57,538.16

Vendors for Micropurchases as needed

- Accurate Communication (in-person translation and American Sign Language): \$1,839.24

DCWP also employs staff who speak multiple languages and engage directly with LEP New Yorkers at outreach events and distribute translated resources.

VI. Provision of language access services

A. Translation

Local Law 30 of 2017 (LL30) requires that DCWP identify and translate the 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 (LPR), and make the process of applying for LPRs accessible.

Notwithstanding the requirements of LL30, DCWP translates additional resources as needed.

1. Criteria for Identifying Most Commonly Distributed Documents

DCWP creates resources to help educate, empower, and protect New Yorkers, such as tips for consumers, information on workplace laws, guidelines for businesses, and more. Each year, the language access coordinator (LAC) will identify the MCD documents by first compiling a list of documents that were distributed to the public by the outreach team 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." For CY2019, the top five MCD documents were:

1. NYC Free Tax Prep Brochure
2. Workers' Bill of Rights
3. Consumer Bill of Rights Regarding Tax Preparers
4. Bail Bond Consumer Bill of Rights

5. Financial Empowerment Center Brochure

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. These guides serve as a tool for New Yorkers who prefer to complete the application on their own and not contact the agency.

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. DCWP promotes these materials on the homepage when applicable and on social media. DCWP also has partnerships with community organizations to ensure they have access to translated materials to share with their stakeholders.

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. Field Inspectors carry a handout promoting free interpretation (see appendix) that allow businesses to point to their preferred language and have the inspector call an interpreter for the inspection. DCWP's outreach team uses Language Line telephonic interpretation to provide language assistance if an individual has difficulty understanding the staff member on the phone. If staff does not recognize the language in the field, they work with a customer service representative at Language Line to identify the language that is needed. To make sure the interpretation is successful and more intuitive the team briefs the telephonic interpreter on goals they want to accomplish and provide special instruction if necessary. The outreach team also has staff that speaks several other languages and assists with communicating with LEP speakers whenever possible.

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, who is listed in the internal language bank of multilingual agency staff, 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.

VII. 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 and will also provide refreshers periodically.

VIII. 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.

IX. 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. Bilingual staff members' language skills are usually assessed through field testing and peer review by trusted reviewers.
- 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. DCWP regularly evaluates its translation budget based on need and demand to ensure we can provide as much language access as possible.
- DCWP will conduct 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.

X. 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.

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:

Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.

Arabic  عربي أشر إلى لغتك. وسوف يتم جلب مترجم فوري لك. سيتم تأمين المترجم الفوري مجاناً.	Laotian  ພາສາລາວ ຊື້ຍອກພາສາທີ່ເຈົ້າເວົ້າໄດ້. ພວກເຮົາຈະຕິດຕໍ່ນາຍພາສາໃຫ້. ທ່ານບໍ່ຕ້ອງເສຍເງິນຄ່າແປໃຫ້ແກ່ນາຍແປພາສາ.
Bengali  বাংলা আপনার ভাষার দিকে নির্দেশ করুন। একজন দোভাষীকে ডাকা হবে। দোভাষী আপনি নিখরচায় পাবেন।	Mandarin  國語 請指認您的語言， 以便為您提供免費的口譯服務。
Punjabi  ਪੰਜਾਬੀ ਅਪਣੀ ਭਾਸ਼ਾ ਵੱਲ ਇਸ਼ਾਰਾ ਕਰੋ ਅਤੇ ਇਹ ਦੁਆਰੀਆਂ ਬੁਲਾਇਆ ਜਾਵੇਗਾ। ਇਹ ਦੁਆਰੀਆਂ ਤੁਹਾਨੂੰ ਬਿਨਾਂ ਕਿਸੇ ਖਰਚ ਦੇ ਚਿੱਤਾ ਜਾਵੇਗਾ।	Polish  Polski Proszę wskazać swój język i wezwiemy tłumacza. Tłumacza zapewnimy bezpłatnie.
Cantonese  廣東話 請指認您的語言， 以便為您提供免費的傳譯服務。	Portuguese  Português Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.
French  Français Pointez vers votre langue et on appellera un interprète qui vous sera fourni gratuitement.	Russian  Русский Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.
German  Deutsch Zeigen Sie auf Ihre Sprache. Ein Dolmetscher wird gerufen. Der Dolmetscher ist für Sie kostenlos.	Spanish  Español Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.
Hindi  हिंदी अपनी भाषा पर इंगित करें और एक दुभाषिया बुलाया जाएगा। दुभाषिये का प्रबन्ध आप पर बिना किसी खर्च के किया जाता है।	Tagalog  Tagalog Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.
Italian  Italiano Puntare sulla propria lingua. Un interprete sarà chiamato. Il servizio è gratuito.	Thai  ไทย ช่วยชี้ที่ภาษาที่ท่านพูด แล้วเราจะจัดหาสามให้ท่าน การใช้บริการไม่ต้องเสียค่าใช้จ่าย
Japanese  日本語 あなたの話す言語を指して下さい。 無料で通訳を提供します。	Urdu  اردو اپنی زبان پر اشارہ کریں اور ایک ترجمان بلایا جائیگا۔ ترجمان کا انتظام آپ پر بغیر کسی خرچ کے کیا جاتا ہے۔
Korean  한국어 귀하께서 사용하는 언어를 지적하시면 해당 언어 통역 서비스를 무료로 제공해 드립니다.	Vietnamese  Tiếng Việt Hãy chỉ vào ngôn ngữ của quý vị. Một thông dịch viên sẽ được gọi đến, quý vị sẽ không phải trả tiền cho thông dịch viên.

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