
Language Access Implementation Plan
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Introduction

Language access is critical for New York City's diverse communities. The city is home to approximately 3.4 million immigrants, and almost half of all New Yorkers speak a language other than English at home. Approximately a quarter of New York City's population, or 1.8 million New Yorkers, identify themselves as limited English proficient.

Executive Order and Local Law

Executive Order 120 of 2008 established a uniform policy and standards for translation and interpretation services for City agencies that have direct interaction with New Yorkers. It required that each City agency designate a Language Access Coordinator, develop a language access implementation plan and provide interpretation services for the top six languages spoken in New York City.

Local Law 30 of 2017 strengthens language access services for people with limited English skills and expands the list of designated citywide languages to 10. It requires City agencies that provide direct services to the public to translate their most commonly distributed documents into the top 10 citywide languages. It also requires agencies to provide telephonic interpretation in at least 100 languages and to develop a language access implementation plan to be posted on an agency's website.

Role and Responsibilities of the Language Access Coordinator

The Language Access Coordinator at the Department of Buildings is Lisa Lewis, Director of Customer Service. In this role, she has the following responsibilities:

- Works with agency stakeholders to creating a language access plan, monitor its implementation and maintain current and relevant policies and procedures
- Collects and evaluates customer data and program effectiveness
- Communicates with the Mayor's Office of Immigrant Affairs and the Mayor's Office of Operations on language access plan implementation strategy
- Develops and distributes materials to inform staff and customers of language access programs
- Convenes, supports, and maintains up-to-date contact information for staff assisting with the language access program
- Coordinates and assesses training to ensure staff is prepared to provide meaningful language access to LEP customers
- Oversees citywide contracts related to language access services (interpreting, translation, and cultural competency) to ensure quality assurance and cost benefits

I. Agency Mission and Background

The New York City Department of Buildings (The Department) ensures the safe and lawful use of more than 900,000 buildings and properties by enforcing the Building Code, Zoning Resolution, and other applicable laws. Each year it reviews over 60,000 construction plans, issues over 110,000 new and renewed permits, performs over 300,000 inspections, and issues 12 types of licenses, registrations, and certificates. It facilitates construction by continually streamlining the permit application process, and delivers services with integrity and professionalism.

DOB architects and engineers evaluate construction plans, verifying they meet Building Code and zoning requirements. Inspectors monitor job sites to enforce building code and zoning regulations, and issue violations when appropriate. The Department issues a Certificate of Occupancy (C of O), which documents the legal use and/or occupancy of a building, when the required sign-offs are obtained. Administrative and support staff are dedicated to meeting the needs of the public by providing excellent customer service and developing streamlined operations that are effective and ensure public safety.

Permits

- Alterations – Room additions, conversions and renovations
- Construction Equipment - Fences, sheds, chutes, scaffolds, etc.
- Curb Cuts
- Demolition & Removal
- Electrical Systems
- Elevators
- Fire Alarms
- Fire Suppression Systems
- Foundation/Earthwork
- Fuel Burning/Storage
- Mechanical and HVAC (Heating, Ventilating and Air Conditioning Systems)
- New Building Construction
- Places of Assembly (PA)
- Plumbing Systems
- Residential Work – Decks/porches, garages, fences, fireplaces, pools, water heaters, etc.
- Signs
- Sprinklers
- Standpipe Systems
- Subdivisions

Licenses (issued and renewed)

- Master Plumbers
- Master Fire Suppression Piping Contractors (Class A, B and C)
- Welders (Classes 1-4)
- Engineers (Stationary and Portable)
- Hoisting Machine Operators (Class A & B)
- Hoisting Machine Operators (Class C)
- Master Sign Hangers
- Special Sign Hangers
- Master Riggers
- Special Riggers
- Elevator Inspectors
- Elevator Agency Directors
- Oil Burning Equipment Installers (Class A & B)
- Climber or Tower Crane Riggers
- Site Safety Coordinator
- Site Safety Managers
- Cement Testing Laboratories
- Master Electrician
- Special Electrician

Registrations

- Construction Superintendents
- Filing Representatives
- General Contractor

II. Agency's Language Access Policy and Goals

A. Language Access Policy

The Department provides both interpretation and translation services to ensure LEP individuals have access to the information and services they need. This includes notifying customers of their rights to free language services and enforcing the provision of these services through staff training and outreach.

B. Agency Language Access Goals

The Department of Buildings aims to provide meaningful access to services and materials by updating and continuing to implement an agency-specific language assistance plan for our Limited-English Proficient (LEP) applicants, homeowners, business owners and other customers. This year this includes:

- Evaluating current policies and developing new internal and external training and outreach initiatives.
- Recruiting more internal bilingual volunteers.
- Identifying documents for translation that affect public and worker safety.
- Implementing plain language guidelines and providing cultural sensitivity resources.

III. Limited English Proficiency (LEP) Population Assessment

The Department of Buildings utilizes the top ten designated citywide languages to provide services to LEP customers. We vary the delivery of these services based upon the frequency of contact or anticipated contact of LEP customers. Reasonable steps are taken to accomplish our goals but at the point at which costs approach or exceed the benefits, alternative methods of delivery of language services will be evaluated and appropriate changes made.

A. Execution of the U.S. Department of Justice's Four-Factor Analysis

- **Factor 1: The number or proportion of LEP persons in the eligible service population**

The Department determined the proportion of LEP persons identified based on data obtained from 311 and an internal survey of our customers. Our 2017 assessment is that less than one percent of customers who visit or contact our borough and central offices are persons who are Limited English Proficient. Data is also taken from the American Community Survey made available by the NYC Department of Planning:

<https://www1.nyc.gov/site/planning/data-maps/nyc-population/american-community-survey.page>.

How members of public can submit language access complaints, questions, and requests	Agency 311 Data (CY 2017)	Description of how complaints/requests were addressed
By calling or submitting an online request to 311	# of language access complaints received via 311: 0	N/A
	# of requests for language access services via 311: 0	N/A

- **Factor 2: The frequency with which LEP individuals come into contact with the agency**

The Department tracks the number of LEP customers we encounter by requiring units to provide a monthly report of the customers who receive services from staff volunteers. We also monitor the monthly billing reports from the language interpretation vendor:

Language	Vendor	Volunteer
Cantonese	2	1
Mandarin	43	2
Spanish	29	16
Korean	8	
Russian	4	
Arabic	1	
French	1	
Hungarian	1	
Polish	1	
Punjabi	1	
TOTAL	91	19

- **Factor 3: The importance of the benefit, service, information, or encounter to the LEP person**

It is the Department's intent to provide meaningful access to all customers and eligible individuals but with limited resources our focus is on the activities that directly impact public safety including outreach, issuance of violations, vacate orders and stop work orders, legal actions, and life and safety notices. Information about and an understanding of these activities should be effectively communicated to all persons immediately affected.

- **Factor 4: The resources available to the agency and the costs of providing language services**

We will budget for and utilize the current vendor contracted by the NYC Department of

Information Technology and Telecommunications, Language Line Services, Inc., for telephone interpretation and Geneva Worldwide for document translation services. We will also make use of the citywide and internal volunteer language bank and actively recruit more internal volunteers.

IV. Provisions of Language Access services

The Department of Buildings provides language access services in line with the citywide designated languages through staffing and contracts. We currently provide in-person interpretation with onsite volunteers, use Language Line Services, Inc. for telephone interpretation and Geneva Worldwide for document translation. Throughout our borough offices, we have posted multilingual signage in high traffic locations informing customers of the availability of free interpretation services. The Department will identify and translate the most commonly distributed or requested materials by our customers that provide information related to public and worker safety. We will review and revise documents following the plain language guidelines prior to translation. We will include materials about emergency preparedness and response as key documents needing translation.

A. Translation Services

- Identify Essential Documents

We conducted an internal survey and found the following documents to be essential to assisting our customers based on public safety and frequency of request. We will make the following documents available in the designated citywide languages:

- AEU-2: Certificate of Correction
- LS-4: No Access Notice
- Stop Work Order
- Vacate Order
- Notice of Violation

The translation of these documents and their availability will be shared with ethnic and community media. We will continue to identify documents that pertain to public and worker safety.

- Plain Language Guidelines and Standards

The Chief Customer Officer has provided citywide training on plain language standards and will review all documents before translation. In addition, she will provide training to staff who draft service notices and other communication documents to ensure compliance.

- Service Notices, Press Releases and Website Content

The internal language access committee will address having content available in other formats in addition to PDF and images so that the tools available on nyc.gov allow for these documents to be translated.

- Ensure Quality of Translations

The Department will obtain translation services only from vendors who have a master

contract with the City through an extensive RFP process. Vendors will have internal proofing and editing processes. When available, the Department's bilingual staff will review translated documents for quality, accuracy and appropriateness of terminology. Based on customer feedback and standards created by the internal language access committee, internal staff will be evaluated for effectiveness in providing translation services. Internal outreach will also be conducted to identify staff that is proficient in other languages.

B. Interpretation Services

- Types of agency interactions that require translation services
 - In-person office visits (telephonic interpretation)
 - Telephone interactions (telephonic interpretation)
 - Inspector visits to properties (telephonic interpretation)
 - Materials provided on the website, at meetings and throughout our offices that communicate essential public and worker safety information and by request.
- Identify LEP individuals and their primary language

Evaluating the ability of the customer to communicate effectively is essential in providing great service.

 - If customers does not verbally identify their primary language, staff are trained to ask for the language that they speak at home
 - If staff cannot identify a LEP customer's language by asking, they are instructed to use a Language Identification Card that is available at every service location and provided to all inspectors. The message underneath each language states: "Point to your language. An Interpreter will be called."
 - If the interaction is by telephone and the language cannot be identified, staff is instructed to call the Language Line and seek assistance from the vendor to identify the language.
- Provided Interpretation Services

The Department will provide (spoken) interpretation in over 100 languages by our existing bilingual staff volunteers and paid vendor, Language Line. The contract is in place with Language Line Services. As the staff of the Department of Buildings has grown, we will work to identify new volunteers that can provide interpretation services.
- Ensure Quality of Interpretation Services

The Department will use competent interpreters who have demonstrated proficiency in both English and the intended language, training that includes the skills and ethics of interpreting (e.g. issues of confidentiality), fundamental knowledge in both languages of any specialized terms or concepts and sensitivity to the client's culture.

C. Notification of Free Interpretation Signage

Availability of interpreter services, which is free of charge, is prominently displayed in public areas of borough and central offices. Posters (11" x 17") or desktop displays (8 ½" x 11") are posted in public areas and counters to assist limited English speakers to self-identify their

language. “I Speak” cards are also available at all service center windows. The signage is in the most frequently encountered primary languages of customers served by those facilities. In addition, the television monitors at each location include content that welcome customers in multiple languages. The following signage will be evaluated and implemented:

- Multilingual way-finding and/or office signage at service centers that also notify customers of free interpretation services
- Statements concerning language assistance in outreach materials and messages on our website
- Messaging in presentations to agencies and organizations that refer customers to the agency
- Updated Homeowners Night posters that include free offer of language access services message
- Website message about free language access services
- Materials for inspectors to distribute that indicate availability of free language access services

D. Emergency Preparedness and Response

The Department’s Emergency Response Team has access to Language Line Services and received language access training along with all Department inspectors. A language access representative will be added to the Department’s Continuity of Operations (COOP) planning committee to ensure that NYC Emergency Management protocols are followed.

V. Training

The Department’s effective commitment to Local Law 30 requires trained and knowledgeable staff. The Customer Service Unit staff led by its Deputy Director conducts the training sessions for frontline workers and managers. The sessions include the procedures and policies for assisting LEP customers in-person, by telephone and through written correspondence. It also includes tools and documents to guide employees in providing meaningful access to information and services to LEP customers.

This training is provided during the new hire orientation session for all employees in public contact positions or when a staff member’s job description changes and requires contact with the public. In addition, information about language access is included in the annual customer service training self-study that is required of all staff. Inspections staff receive this training at an annual in-person customer service training. The Customer Service Unit maintains a list of all employees that receive LEP program-related training.

Updates to training content for Local Law 30

New trainings will provide instructions on the proper use of the Language Identification Card and the Language Access Questions to assist in identifying a customer’s primary language. Buildings staff will also be instructed to document the individual’s native language and provide this information to the Customer Service unit for its data collection efforts.

New training topics

The Mayor's Office of Operations is working with the Department of Citywide Administrative Services (DCAS) to incorporate language access, cultural sensitivity and disability communications into a re-developed training for front-line staff.

VI. Record Keeping and Evaluation

The Department maintains records pertaining to the requests for services in non-English languages and our capacity to serve these populations. We ensure the quality of our language access program by tracking the number of interactions LEP customers have with the Department. The language access coordinator in each borough office and central unit provides a monthly report to the Director of Customer Service that includes interactions with LEP individuals during in-person visits at customer service windows and inspections, telephone calls, outreach involving the public, community and civic meetings, conferences, scheduled appointments, and Homeowners' Night.

Efforts are underway to create a yearly report, supervised by the language access coordinator that lists site visit survey results, activities to date and other indicators for successful language access services. This will also include an annual review of the language access plan to assess changes in the LEP population and services requested, effectiveness of existing language assistance to LEP persons, staff knowledge and implementation of the plan, review of active language volunteers and efforts to recruit staff that can provide additional language services, modifications needed to interpretation services contracts, community feedback and efforts to address complaints filed due to language access problems.

To ensure the success of the language assistance program, the customer service working group will monitor the LEP program periodically, but not less than annually, to assess the effectiveness and efficiency of the program. Monitoring will include:

- Feedback from LEP clients
- Feedback from staff
- In-house reviews of the current communications needs of LEP clients
- Contact with community-based organizations that provide services to LEP clients

VII. Resource Analysis and Planning

We will continue to utilize bilingual staff volunteers (25+) and citywide contracts to provide language services. We currently have contracts with two vendors Geneva Worldwide, Inc. (translation) and Language Line Services Inc. (interpretation) to provide training, foreign language interpretation and translation services to assist our LEP customers. The following cost-saving measures can also be explored:

- Expand outreach for volunteer language bank participants
- Centralize interpreter and translation services
- Use qualified community volunteers



VIII. Outreach and Public Awareness of Language Access Services

The Department will utilize all forms of community affairs and marketing opportunities to enhance communication with members of the public regarding language access. In collaboration with the Department’s Intergovernmental Affairs (IGA) Team, the Customer Service Team will communicate with members of the public at meetings of community boards, civic associations, homeowners groups, borough presidents and precinct councils. The language access coordinator will also work with communications staff to expand the translation of the most requested Department documents and engage in outreach with local ethnic press. Information on how to receive Language Access services will be added to the Interactive Voice Recognition (IVR) system during customer hold times. Communications staff will participate in the customer service working group and play an active role in improving and expanding language access initiatives.

IX. Language Access Complaints

The Department will investigate all LEP complaints submitted to and received from 311 and all other forms of communications (telephone, email and postal correspondence). The point of contact for complaints is the Language Access Coordinator who will be responsible for the intake of the complaint, tracking, resolving and reporting the complaint to MOIA. The following protocol will be implemented within ten (10) business days if a complaint is received:

- An investigation initiated by the Chief Customer Officer and the Language Access Coordinator
- Follow up with the impacted customer to provide necessary services
- Retraining for the impacted staff member(s)
- Follow up, if warranted, with written communication from the Commissioner

X. Implementation Plan Logistics

The Department’s Language Access Coordinator is Lisa Lewis, Director of Customer Service who oversees the provision of services to Limited English Proficient individuals. This includes contracts with Language Line Services and Geneva Worldwide to provide telephone interpretation and document translation services. The Department also utilizes internal staff volunteers to serve LEP customers. All Department staff that interacts with the public receives annual training on language access policies and procedures.



Language access goal	Milestones	Responsible staff	Deadline
Include language access issues in the customer service working group comprised of customer service, legal, communications, training, human capital and operational staff to	Conduct monthly meetings	Appointed by the Chief Customer Officer under the guidance of the Deputy Commissioner for Strategic Planning and Policy	In progress

evaluate current policies and identify new internal and external training and outreach initiatives			
Confirm a language access liaison for each borough office and central unit to monitor language access services and serve as a resource for unit staff.	Conduct quarterly meetings	Language Access Coordinator	July 2018
Recruit additional internal bilingual volunteers	Information on how to become a volunteer will be provided during New Hire Orientation, Inspector training and other channels to be identified.	Language Access Coordinator and Human Capital Director	Launch campaign in June 2018
Train all staff on Local Law 30	Included in annual customer service training	Language Access Coordinator and Deputy Director of Customer Service	Completed by December 2018
Implement plain language guidelines and provide cultural sensitivity resources	Conduct focus groups with front line staff to provide guidance and receive feedback about language access experiences	Chief Customer Officer and Language Access Coordinator	January 2019
Produce annual language access report	Require language access liaisons to provide monthly data on LEP customer interactions	Language Access Coordinator	January 2019
Update language access plan	Post on website and update content every 3 years	Chief Customer Officer and Language Access Coordinator	July 2021
Expand outreach and availability of language access services at public events	Include information on invitations that interpretation services can be provided if the Department is notified prior to the event	Language Access Coordinator and Communications staff	December 2018
Provide communications to the public in the designated citywide languages, including emergency	An initiative of the language access committee	Language Access Coordinator and Communications staff	June 2019

notifications, alerts, public hearings, events and press releases			
Review RCNY 28.401.6 to determine if the Department is required to provide language services to licensees and registrants	Provide documents in a format that is compatible with the translation tool on nyc.gov	Language Access Coordinator and Communication staff	June 2020

Appendix

A major language access outreach initiative of the Department of Buildings is conducting safety outreach for workers and the public in multiple languages. The [Experience is Not Enough](#) multilingual campaign was designed to emphasize to all construction workers the importance of using proper fall protection, including [harness safety and scaffold safety tips](#). These brochures are made available in multiple languages to ensure that this critical safety information is widely accessible. In addition, a Safety Training campaign was launched in March 2018 to provide information on new training requirements in multiple languages.

 <p>TRABAJADORES: OBTENGA SUS CAPACITACIÓN</p> <p>Según el requisito de una nueva ley, los trabajadores en la gran mayoría de obras de construcción deben realizar una capacitación obligatoria de 10 horas de OSHA antes del 1 de marzo de 2018</p> <p>Los empleadores que no cumplan con esta ley serán multados.</p> <p>Para obtener más información sobre recursos de capacitación disponibles, llame al 311 o ingrese a nyc.gov/nycsafety</p> 	<p>Proveedores del curso de 10 horas de OSHA</p> <table border="0"> <tr> <td data-bbox="917 714 1055 819"> <p>Catholic Charities Community Services 402 East 152nd Street Bronx, NY 10455 347-978-2350 catholiccharitiesny.org</p> </td> <td data-bbox="1161 714 1356 819"> <p>Northern Manhattan Coalition for Immigrant Rights 5030 Broadway, Suite 639 New York, NY 10034 212-781-0355 www.nmccir.org</p> </td> </tr> <tr> <td data-bbox="917 850 1088 955"> <p>La Colmena - Community Job Center, Staten Island 774 Port Richmond Avenue Staten Island, NY 10302 718-442 7700 lacolmenanyc.org</p> </td> <td data-bbox="1161 850 1356 955"> <p>Proyecto Justicia Laboral/ Worker's Justice Project (WJP) 365 Broadway Brooklyn NY 11211 347-889-6347 / 718-600-0425 workersjustice.org/</p> </td> </tr> <tr> <td data-bbox="917 976 1055 1050"> <p>Man Up 799 Van Siclen Avenue Brooklyn, NY 11207 718-784-0877</p> </td> <td data-bbox="1161 976 1388 1029"> <p>Public Housing Communities Brooklyn, NY info@publichousingcommunities.org</p> </td> </tr> <tr> <td data-bbox="917 1071 1096 1176"> <p>New Immigrant Community Empowerment (NICE) 71-29 Roosevelt Ave. Jackson Heights, NY 11372 718-205-8796 nynice.org</p> </td> <td data-bbox="1161 1071 1323 1144"> <p>Urban Upbound 12-15 40th Ave Long Island City, NY 11101 718-571-9479</p> </td> </tr> </table> <p>Las organizaciones listadas aquí son solo para fines informativos. La Ciudad de Nueva York no se pronuncia a favor de ningún proveedor de capacitación específico.</p>	<p>Catholic Charities Community Services 402 East 152nd Street Bronx, NY 10455 347-978-2350 catholiccharitiesny.org</p>	<p>Northern Manhattan Coalition for Immigrant Rights 5030 Broadway, Suite 639 New York, NY 10034 212-781-0355 www.nmccir.org</p>	<p>La Colmena - Community Job Center, Staten Island 774 Port Richmond Avenue Staten Island, NY 10302 718-442 7700 lacolmenanyc.org</p>	<p>Proyecto Justicia Laboral/ Worker's Justice Project (WJP) 365 Broadway Brooklyn NY 11211 347-889-6347 / 718-600-0425 workersjustice.org/</p>	<p>Man Up 799 Van Siclen Avenue Brooklyn, NY 11207 718-784-0877</p>	<p>Public Housing Communities Brooklyn, NY info@publichousingcommunities.org</p>	<p>New Immigrant Community Empowerment (NICE) 71-29 Roosevelt Ave. Jackson Heights, NY 11372 718-205-8796 nynice.org</p>	<p>Urban Upbound 12-15 40th Ave Long Island City, NY 11101 718-571-9479</p>
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