

NYC Civic Engagement Commission: Methodology for Poll Site Language Assistance (Final)

What is this methodology for?

This is a methodology for determining how the New York City Civic Engagement Commission (NYCCEC) will provide interpretation services at poll sites for limited English proficient voters. The methodology explains how the NYCCEC will identify the languages and locations in which interpretation services will be offered during the November 2020 election and beyond. These services will supplement the interpretation assistance provided by NYC Board of Elections (NYCBOE) in several languages.

Finalizing the Methodology

On January 1, 2020, the NYCCEC published a proposed methodology, and accepted public comment on the proposed methodology from January 1 and March 1, 2020. NYCCEC also held a public hearing on the proposed methodology on February 18, 2020 at 1 Centre Street, 9th Floor, Landmarks and Preservations Room. NYCCEC heard from a variety of individuals and organizations during the comment period through email, the website comment form, and at the hearing. Those comments are summarized along with responses from the NYCCEC in a Frequently Asked Questions document accompanying this methodology. The NYCCEC is now promulgating this final methodology as the methodology that will determine how interpretation services are provided during the November 2020 election and beyond.

What authorizes the Civic Engagement Commission to promulgate this methodology?

The New York City Charter, Chapter 76, requires the NYCCEC to propose a preliminary methodology on or before January 1, 2020, and publish it for public comment for a minimum of 30 days. The NYCCEC is required to publish a final methodology on or before April 1, 2020.

NYC CIVIC ENGAGEMENT COMMISSION: METHODOLOGY FOR POLL SITE LANGUAGE ASSISTANCE PROGRAM

Executive Summary

The New York City Civic Engagement Commission (NYCCEC) is charged under Chapter 76 of the New York City Charter with creating a Poll Site Language Assistance Program (Program) that will provide interpreters at New York City poll sites to assist limited English Proficient (LEP) voters with casting a ballot. The NYCCEC must develop a methodology to determine which languages are eligible for services and the poll sites where such services would be provided.

The timeline for establishing the methodology is as follows:



The NYCCEC accepted public comments until March 1, 2020; it also held a public hearing on February 18, 2020. The recording and transcript of the hearing are available [online](#) via the NYCCEC’s website. Information about the meeting is available on the Commission website, and a recording and transcript will be available after the meeting. While this methodology integrates responses to public comments, an additional attached FAQ document also summarizes key comments received and NYCCEC responses.

Below is a summary of what the NYCCEC is promulgating herein:

Determining the Total Number of Poll Sites Served

The total number of poll sites will depend on the amount of money allocated to this program, availability of qualified interpreters for the Program languages, and the time needed to recruit interpreters.

Languages Served

Based on guidelines set forth in the Charter, including that NYCCEC may not provide poll site assistance in languages and in counties mandated for service through the Voting Rights Act, and based on analysis of data from the American Community Survey, the Program will provide services in the following languages (hereinafter “Program Eligible Languages”):

- Arabic
- Bengali
- Chinese (Cantonese, Mandarin)
- French
- Haitian Creole

- Italian
- Korean
- Polish
- Russian
- Urdu
- Yiddish

The NYCCEC will provide services in Bengali, Korean, and Chinese (Cantonese, Mandarin) only in counties where the New York City Board of Elections (NYCBOE) is not mandated to provide services in such languages under the federal Voting Rights Act. The Charter also requires the NYCCEC to review its methodology for revision by September 2022, if not sooner.

Determining the Target Population Who Will be Served

This Program will attempt to target individuals who: (1) are eligible to vote, (2) speak a Program Eligible Language, (3) are limited English proficient and (4), whose home address is served by the selected poll site.

Determining the Number of Poll Sites for Each Language

Since no dataset is currently available that reliably captures LEP of registered voters for all program languages, the NYCCEC will use LEP of citizens of voting age (CVALEP) as a substitute or proxy measure of need. NYCCEC will rank the Program Eligible Languages in order of magnitude of CVALEP and distribute poll sites to each language based on its ranking (excluding CVALEP persons that speak languages served by NYCBOE in certain New York City counties). The number of poll sites that will receive services in any given language will depend on each language's share of the total CVALEP in the population eligible to be served. For example, according to U.S. Census data, approximately 207,926 New Yorkers are CVALEP and speak a language that is served by this Program. Russian CVALEP makes up the largest share, nearly 39% of the whole. Therefore, if hypothetically, NYCCEC is allocated resources to serve 100 poll sites total, interpretation would be provided in Russian in up to 39% of the total number of poll sites or up to 39 poll sites out of 100 poll sites. This proportionality approach allows NYCCEC to balance goals of including diverse language communities as well as fair access to the total number of eligible voters *within* each language community.

Targeting Poll Sites for Services in a Particular Language

The Program will provide interpreters in Program Eligible Languages at poll sites based on U.S. Census data showing concentrations of CVALEP individuals who speak these languages and reside around each poll site. For each language, poll sites will be chosen in descending order of concentration of CVALEP, until the language's share is met. For example, poll sites will be ordered from highest to lowest concentration of Russian CVALEP, and since Russian CVALEP makes up 39% of the total number of CVALEP New Yorkers, the top 39 sites of highest concentration will be selected for services. This process will be repeated for each language,

thereby including the poll sites with the highest concentration of CVALEP for each Program Eligible Language until that language's share is met, and the total number of poll sites for which resources are allocated is reached. It may be possible, based on analysis of data, to reassign poll sites to languages with greater need; however, each language will receive a minimum of at least one poll site.

Administrative Data, such as surnames of registered voters within each poll site, and interpreter journals on service utilization rates, will not be used to select poll sites. However, over time, once it becomes accessible and available, it could be used to cross-check and validate specific poll sites selected based on ACS data for a given year.

Introduction: What is the NYC Civic Engagement Commission?

During his State of the City address in February 2018, Mayor Bill de Blasio announced his intent to appoint a Charter Revision Commission to review and make recommendations to revise the New York City Charter. In November of 2018, New York City voters approved a proposal of the Charter Revision Commission that established a Civic Engagement Commission (NYCCEC).¹

The NYCCEC is made up of 15 members, or Commissioners, who are appointed by the Mayor, the Council Speaker, and the Borough Presidents. The Commission's Chair is appointed by the Mayor.

The NYCCEC's mission is to:

- increase civic participation in order to build public trust and strengthen local democracy;
- motivate New Yorkers to have an active civic life through partnerships with public and private entities, civic organizations and community/social groups;
- implement citywide participatory budgeting to give New Yorkers a voice on the City's budget allocations;
- provide interpretation services at poll sites, for citizens with limited English proficiency; and
- develop initiatives to help community boards reach and serve more diverse New Yorkers.

History of City Language Assistance at Poll Sites

According to the 2018 American Community Survey (ACS),² approximately 23% of all New Yorkers, over 1.8 million people, including approximately 49% of immigrant New Yorkers were Limited English Proficient (LEP)³ meaning they speak English less than "very well."⁴

The City has been working to improve language access across all its programs to ensure that New Yorkers with LEP have equal access to City resources and services. In 2017, recognizing that

¹ The Charter was then revised to include Chapter 76, which governs the NYCCEC.

² The ACS is a yearly national survey of 3.5 million households. It is conducted by the U.S. Census Bureau.

³ 2014-2018 American Community Survey 5 Year Estimates, U.S. Census Bureau, <https://data.census.gov/cedsci/table?q=social&g=1600000US3651000&tid=ACSDP5Y2018.DP02&vintage=2018&hidePreview=true> (last visited March 27, 2019).

⁴ The ACS asks three questions to assess languages spoken by each person who lives in the home: whether people speak a language other than English at home; if yes, which language they speak; and how well they speak English. The question about English proficiency states: "How well does this person speak English?" People can answer "Very well," "Well," "Not well" or "Not at all." U.S. Census Bureau, <https://www2.census.gov/programs-surveys/acs/about/qbyqfact/Language.pdf> (last visited December 15, 2019). A study compared answers for this question from the 2003 ACS to the 2003 National Assessment of Adult Literacy (NAAL) and found that only people who answered "very well" on the ACS tended to have very similar profiles as English only speakers on the NAAL, which is why the other three responses are grouped as "limited English proficient." U.S. Census Bureau, <https://www.census.gov/library/working-papers/2015/demo/SEHSD-WP2015-18.html> (last visited December 15, 2019).

translation and interpretation can help LEP voters to more fully participate in our democracy, the Mayor's Office of Immigrant Affairs (MOIA) launched a pilot program to expand interpretation services at poll sites.

The City's interpretation program has supplemented existing interpretation services already provided by the New York City Board of Elections (NYCBOE). Under the federal Voting Rights Act (VRA), NYCBOE must provide information and assistance to voters in various languages depending on the county.

NYCBOE currently provides language assistance in the following languages and counties:

- New York: Spanish, Chinese (Cantonese, Mandarin).
- Kings: Spanish, Chinese (Cantonese and Mandarin).
- Queens: Spanish, Chinese (Cantonese and Mandarin), Korean, Bengali Hindi, and Punjabi.
- Bronx: Spanish.
- Richmond: Spanish.

NYCBOE provides trained interpreters serving at poll sites in all of the above languages. It also provides translated ballots and informational flyers in some of these languages (Spanish, Chinese, Korean, and Bengali).

To determine which additional languages and poll sites to target for services, MOIA drew on the expertise of demographers and data analysts, and prior research. It also considered the NYCBOE's methodology that determines which poll sites it targets when providing Chinese and Korean interpretation.

First, MOIA identified the most commonly spoken languages and English proficiency citywide, using Census data. Second, MOIA estimated language and English proficiency by election districts. Since one poll site comprises several election districts, the analysis then grouped election districts into poll sites. Third, MOIA used the ACS question on citizenship⁵ to get a more accurate number of eligible LEP voters who live within each poll site area.

To avoid duplication of services, MOIA provided interpretation only in languages that were not being served by NYCBOE. Below are the number of sites served for each language by year.

2017 general election: 20 sites serving Russian (15) and Haitian Creole (5).

2018 general election: 101 sites serving Russian (71), Haitian Creole (17), Yiddish (7), Polish (4), Italian (2) and Arabic (1).⁶

⁵ ACS asks of each person in the home: Is this person a citizen of the United States? U.S. Census Bureau, <https://www.census.gov/acs/www/about/why-we-ask-each-question/citizenship/> (last visited December 15, 2019).

⁶ One site served both Russian and Arabic speaking LEP voters and is thus counted only once in the total 101 sites covered by MOIA's program.

In 2019 MOIA provided language assistance at four separate elections:

- February 2019 Special Election for Public Advocate: 48 sites serving Russian (40), Haitian Creole (5), Yiddish (2), and Polish (1) speakers.
- May 2019 Special Election for Council District 45: 3 sites serving Haitian Creole speakers.
- June 2019 Primary Election: 48 sites serving Russian (40), Haitian Creole (5), Yiddish (2), and Polish (1) speakers.
- November 2019 General Election: 100 sites serving Russian (70 sites), Haitian Creole (17), Yiddish (7), Polish (4), and Italian (2) speakers.

MOIA will continue to provide poll site language assistance services until oversight and operations are transferred to the NYCCEC for the November 2020 election.

Project Timeline

The Charter requires the NYCCEC to:

1. Create a proposed poll site targeting methodology on or before January 1, 2020;
2. Post the proposed methodology for public comment for a minimum of 30 days and hold a public hearing;
3. Use public comments to review and revise the methodology and post the final methodology on or before April 1, 2020;
4. Use the final methodology to provide interpretation services in the November 2020 General Election and all general, primary, and special elections going forward; and
5. Review and update the methodology on or before September 1, 2022 and at least every five years after that date.

Methodology for Language Assistance at Poll Sites

The NYCCEC Poll Site Language Assistance Program builds upon the MOIA pilot program, and lessons learned. The New York City Charter includes various factors that NYCCEC should consider in developing a methodology, including, but not limited to:

- Relevant data from the most recent American Community Survey (ACS) from the United States Census Bureau;
- Locations of poll sites and the boundaries of election districts;
- Information related to voter turnout; and
- Any other information as deemed appropriate by the NYCCEC, which may include the results of a surname analysis of registered voters.

NYCCEC's methodology consists of using Census data to: (1) identify the languages most commonly spoken by eligible voters with limited English proficiency for which the NYCBOE does not provide language assistance and (2) identify the poll sites that serve the greatest number of these voters.

NYCCEC consulted with expert data analysts from the Department of City Planning (DCP), MOIA and the Mayor's Community Affairs Unit (CAU) to perform the necessary statistical analysis and develop the methodology. NYC's Chief Democracy Officer, and other administration stakeholders also reviewed the methodology.

Like the NYCBOE, the methodology uses the following datasets:

- American Community Survey (ACS) estimates (2014-2018 5-year Public Use Microdata Samples) for citywide estimates;⁷
- American Community Survey Census Tract ⁸ estimates (2013-2017 5-year Public Use Microdata Samples) for poll site level analysis.

NYCCEC's analysis of languages most commonly spoken by eligible voters with LEP utilized ACS data on:

- Languages spoken at home;
- English proficiency;
- Age; and
- Citizenship status.

The U.S. Census Bureau's American Community Survey (ACS) is a sample survey. When compared to other data, it is currently the most accurate data available for analyzing languages most commonly spoken across the city and nation. At the same time, it is important to note that the ACS does not ask whether participants are registered voters. Thus, using citizenship status is the closest measure of eligibility to vote. Nor does the ACS capture citizenship data at the level of election districts. Using a statistical procedure, this methodology first allocates the CVALEP at the PUMA⁹ level to Census tracts, which are then distributed to poll sites based on registered voter data from the NYCBOE to determine which Program Eligible Languages could be served at each poll site.

Selection of Program Eligible Languages

The Charter requires identifying poll sites with a significant concentration of limited English proficient speakers of Designated Citywide Languages, as such term is defined in section 23-1101 of the administrative code, based on neutral criteria. These Designated Citywide Languages are a ranking of the top ten most widely spoken languages in New York City, based on Census and Department of Education data. As of 2017,¹⁰ these languages include:

- Spanish

⁷ Only five-year data provide estimates at the tract level. For additional information on the PUMS data, please see U.S. Census Bureau, "Public Use Microdata Sample (PUMS) Documentation" (2019), available at <https://www.census.gov/programs-surveys/acs/technical-documentation/pums.html>

⁸ Census tract is an area roughly equivalent to a neighborhood, roughly 4000 people.

⁹ PUMAs are approximately the same size as community board districts.

¹⁰ https://www1.nyc.gov/assets/immigrants/downloads/pdf/Local_Law_30.pdf (Local Law 30 Report, 2019)

- Chinese (including Mandarin and Cantonese)
- Russian
- Haitian Creole
- Korean
- Bengali
- Arabic
- Polish
- Urdu
- French

These languages are spoken by approximately 86%¹¹ of the population with LEP in New York City.

The Charter also permits the NYCCEC to provide interpretation services to an additional language, provided that (1) the number of persons with LEP that speak that language is greater than the number of persons with LEP that speak the lowest ranked Designated Citywide Language, based on U.S. Census data as determined by DCP and the Office of the Language Services Coordinator, and (2) at least one poll site is likely to have a significant concentration of speakers with LEP of such language. Therefore, Yiddish and Italian are included because they each have a greater number of speakers with LEP than the lowest ranked Citywide Designated Language which is Urdu.

As stated previously, NYCCEC does not have the authority to provide interpretation services in a VRA language in a county where the NYCBOE is mandated to provide such services by the federal Voting Rights Act. Therefore, these languages and counties are excluded from the analysis.

Table 1 lists in descending order of concentration the languages that have been selected to receive services under NYCCEC's Methodology (hereinafter "Program Eligible Languages"), and the number of all New Yorkers age 5+ with LEP who speak such languages. Table 1 excludes LEP speakers of the VRA languages that reside in a county covered by the VRA. More specifically, Spanish LEP figures are not included in the table. Table 1 includes Chinese, Korean, and Bengali LEP New Yorkers only if they reside in counties NOT covered by VRA. In other words, Chinese is included only for Bronx and Richmond County; Korean is included only for New York, Kings, Bronx, and Richmond County; and Bengali is included only for New York, Kings, Bronx, and Richmond County.

An upcoming section discusses the method of determining the number of poll sites to be served for each language.

¹¹ Of those aged 5 and over based on 2014-2018 American Community Survey 5 Year Public Use Microdata Sample, U.S. Census Bureau.

Table 1. Total LEP New Yorkers that speak a Program Eligible Language in Counties that are Eligible for Services (U.S. Census Bureau 2014-2018 American Community Survey 5-Year Data)

Language Spoken at Home	Number of LEP New Yorkers Age 5+
Russian	108,276
Haitian Creole	41,914
Arabic	30,120
Yiddish	29,844
Italian	24,417
Polish	23,391
French	22,080
Bengali	21,377
Urdu	21,297
Chinese	13,151
Korean	9,929
Total	345,796

Determining the Total Citizen Voting Age Population

The data in Table 1 on the number of New Yorkers with LEP includes all people in a household age 5 and older. It thus includes many New Yorkers who are ineligible to vote based on age, and people who are not registered voters. Given that (1) the proportion of residents who become citizens will be hard to predict at the poll site level, (2) that the Program will serve only a limited number of poll sites, and (3) the ACS does not include data on registered voters, the analysis next focused on how many citizens of voting age speak the Program Eligible Languages.

Table 2 shows in descending order of concentration the total number of citizen New Yorkers with LEP 18 years old or older (known as “Citizen Voting Age Limited English Proficient” or CVALEP) that speak a Program Eligible Language in a county that is eligible for services under this Program.

Table 2. Total CVALEP New Yorkers that Speak a Program Eligible Language in Counties that are Eligible for Services (U.S. Census Bureau, 2018 American Community Survey 5-Year Data)

Language Spoken at Home	Total # of CVALEP*
Russian	80,634
Haitian Creole	24,299
Italian	18,529
Arabic	14,670
Yiddish	12,671
Polish	12,628
Urdu	11,433
Bengali**	10,856
French	9,564
Chinese*	7,526
Korean**	5,116
Total	207,926

* Chinese includes Mandarin and Cantonese. Data shown for the Bronx and Staten Island only.

** Data shown for Bronx, Brooklyn, Manhattan, and Staten Island only.

The actual number of LEP voters using these services is likely to be less than the number of citizens of voting age, since not all citizens are registered voters, and even among registered voters, patterns of voting vary by type of election and individual motivation. But it is the case that anyone who naturalizes and reaches voting age between the time the data is collected and analyzed and when the program will be administered can be served in a program language provided they live in an area served by a poll site selected using this methodology.

Total Poll Sites Served for Each Program Eligible Language

Under this methodology, the total number of poll sites served by the Program will depend on the NYCCEC's budget allocation, time and resource constraints. In addition, the Program should serve LEP voters in every eligible language in at least one poll site. However, languages are represented in different concentrations across New York City. Larger language communities are also likely to have a larger number of citizens of voting age. For example, among the Program Eligible Languages, Russian has the highest number of citizen voting age LEP speakers (n= 80,634), and the number of citizens voting age who are Polish LEP is much smaller (n= 12,628). Given this diverse representation, NYCCEC's methodology determines need for services partly based on the number of people speaking each language **and** how each language community is represented compared to other languages. To determine how many poll sites will be served for each language, NYCCEC uses a proportional approach.

The number of poll sites allocated to each Program Eligible Language will be determined by the percent of CVALEP speakers citywide that speak that language—excluding counties and

languages served by the NYCBOE. Each language will be assigned a fixed number of poll sites based on the percent of CVALEP for each language (percentage estimates will be rounded). Table 3, shows the percent of CVALEP for each Program Eligible Language, based on the total number of CVALEP New Yorkers who speak a Program Eligible Language in a county that is eligible for services under this Program. **The NYCCEC has not finalized the number of poll sites to be served, and this table is meant only to illustrate how poll sites will be allocated.**

Table 3. Example of Allocation of Poll Sites Served for Each Program Eligible Language in Counties Eligible for Services (Based on U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Data)

Language Spoken at Home	Total # of CVALEP	% of Total*	Number of sites out of ~100 sites*
Russian	80,634	38.8	39
Haitian Creole	24,299	11.7	12
Italian	18,529	8.9	9
Arabic	14,670	7.1	7
Yiddish	12,671	6.1	6
Polish	12,628	6.1	6
Urdu	11,433	5.5	6
Bengali**	10,856	5.2	5
French	9,564	4.6	5
Chinese*	7,526	3.6	4
Korean**	5,116	2.5	3
Total	207,926	100.1	

*Numbers may not add up due to rounding.

Choosing the specific poll sites is based on two steps:

- First, NYCCEC would determine the CVALEP concentration in the area surrounding all City poll sites and, for each language, rank order the poll sites from highest to lowest concentration;
- Second, NYCCEC would select poll sites beginning with the highest concentration of CVALEP and going down the list of poll sites until it reaches the share or proportion of poll sites for each Program Eligible Language.

For example, as shown in Table 3, approximately 207,926 New Yorkers are CVALEP and speak a language that is served by this Program. Of that number, 39% speak Russian. Therefore, for example, if NYCCEC is allocated resources to serve 100 poll sites total, interpretation would be provided in Russian in up to 39% of the total number of poll sites or up to 39 poll sites out of 100 poll sites. The 39 poll sites would be selected in descending order of concentration, starting with the poll site with the highest concentration of Russian speakers who are CVALEP, until the 39th poll site is reached.

It is important to note that this methodology does not begin with a threshold/minimum number of LEP speakers of any language who must reside near a poll site. Nor does it assume that resources will exist to serve every poll site that meets that minimum. Since the designated citywide languages cover 86% of the LEP population of New York City, ordering poll sites from high to low concentration followed by proportional selection for each language will assure that poll sites with high need are included for every language.

However, language communities are likely to show varying patterns of clustering around poll sites, for example, larger language communities may show more people densely concentrated around any given poll site than a smaller language community. Language communities may also have different rates of naturalization over time. Therefore, it is possible that an analysis of the data may show that CVALEP of a given language community is found to be spread out and concentrated at fewer poll sites than the total number of poll sites allocated for that language. For example, if the NYCCEC methodology allocated 5 poll sites for a given language, and the population of CVALEP speakers is spread out thinly across many poll sites across the City, and utilization is low over time, the NYCCEC may reallocate poll sites to a different language with a greater need based on the data. In November 2020, all languages will be served according to the proportion listed in Table 3 of this methodology. Depending on available funding, percent of CVALEP and usage rates over subsequent years, NYCCEC may adjust the number of poll sites for languages. A minimum of one poll site for each Program Eligible Language will be retained.

Poll Site Selection or Targeting of Poll Sites

To gain the most accurate estimates of CVALEP, the analysis must consider four different geographic units, which differ in their size, and whose boundaries do not align: Census tracts, PUMA, Election Districts, and poll site. As mentioned earlier, ACS data can be analyzed by Census tract and by PUMA. ACS data does not allow analysis by voter registration status, election district or poll site. Therefore, additional statistical analysis is necessary in order to allocate ACS data to poll sites. Data on the Election District boundaries and poll sites is drawn from lists published by the NYCBOE that show the Election Districts assigned to each poll site.

In New York City, there are approximately 2,168 Census tracts 55 PUMAs, and 5,980 election districts. There are also 1,230 poll sites (not including early voting sites) each of which serves a varied number of election districts. Geographic Information System (GIS) mapping software must be used to map the election districts and poll sites onto the American Community Survey data. The methodology and mapping adjust for these differences in geographic boundaries.

NYCCEC would use the following steps to determine which poll sites would be served for each covered language:

1. Obtain census tract data on the number of persons who speak that language;
2. For each PUMA, calculate the percent of language speakers who are CVALEP;
3. Apply CVALEP percent at the PUMA level to the number of persons who speak that language at the tract level to get the CVALEP population at the census tract level;

4. Distribute census tract-level CVALEP data to poll sites, based on voter registration data from the NYCBOE, which gives you the CVALEP population by poll site.

These steps described above will be used to generate a list of poll sites with the languages most commonly spoken by the CVALEP. As mentioned earlier, the poll sites will be selected in descending order of concentration of CVALEP, starting with the highest concentration.

These steps for choosing poll sites are like the process previously used in the MOIA program. The main difference is that NYCCEC is required to serve all the designated citywide languages and uses a proportional approach to determine how many poll sites to select for each language. NYCBOE's list of designated poll sites for primary and general elections is available after March 15 each year, and by May 1 of each year for early voting, and these lists are subject to change after such dates. NYCCEC will review the CVALEP data for each year using the most recent ACS data, and select poll sites using the most current available list of poll sites. For the purpose of illustration, Appendix A includes a hypothetical list of poll sites that may have been included using the November 2019 list of poll sites.

Through this final methodology, NYCCEC aims to create a strictly nonpartisan and neutral process, to serve voters with LEP with the greatest need for interpretation services.

Using Administrative Data

The American Community Survey data is more accurate for larger geographic areas such as Census tract, and reliability decreases as one goes down to census tracts (which are then distributed to poll sites). Therefore, as recommended in the Charter, it may be helpful to take Administrative Data into account to increase the accuracy of estimates on the prevalence of CVALEP by poll site. Administrative Data can be used to verify if a poll site selected using the ACS should receive services or not, and it may allow for better estimates than may be possible using solely Census data. Administrative Data, when used additively to verify analysis using Census data, may allow the Program to save resources and target where the need is greatest.

According to the Charter, the Administrative Data that the NYCCEC may consider includes:

- Voter turnout by election district or poll site service area if available;
- Interpreter journals that show the number of people who used language assistance services at a specific poll site; and
- Surnames of registered voters within each poll site; ¹² language communities share common last names, and their concentration in given poll sites would help confirm that the Census estimates are valid.

¹² Surname analysis is a technique utilized by demographers to identify the members of particular racial, ethnic, or language communities within a population, insofar as a surname belongs uniquely to a particular racial or ethnic group, often referencing well-formulated surname dictionaries.

Abrahamse, A.F., Morrison, P.A. & Bolton, N.M. Surname analysis for estimating local concentration of Hispanics and Asians. *Popul Res Policy Rev* 13, 383-390 (1994).

NYCCEC is a recently established entity, and the recent pilots run by MOIA do not have the same visibility as NYCBOE's long-standing program to provide language assistance at poll sites. Accumulating Administrative Data depends on both outreach to communities and tracking usage at poll sites. For this reason, NYCCEC's final methodology uses caution when considering Administrative Data, and recommends at least three election cycles to accumulate such data. A longer time to accumulate Administrative Data will allow a more accurate understanding of utilization rates.

If and where feasible, the NYCCEC will use a surname analysis to provide additional validation of the Census analysis above to target poll sites. This method requires that a list of validated surnames be available for each language and linked to registered voter data at the poll site level. Again, NYCCEC proposes collecting administrative data on utilization for at least three general elections for any given poll site, before designating a threshold or removing a site.

Early Voting

In 2019, New York State passed legislation to establish nine days of early voting prior to Election Day. Early voting will be offered at all general, primary, and special elections in the City. Poll sites used for early voting are different from the poll sites designated for Election Day.

The NYCCEC's methodology for selecting early voting poll sites will be the same as the methodology for selecting Election Day poll sites. The number of early voting sites in which interpreters will be provided will be based on the following:

1. Identify the most commonly spoken languages by the City's CVALEP population (for which the NYCBOE does not provide language assistance);
2. Identify the poll sites that serve the greatest concentration of voters.

According to 2019 data, the last two days of early voting had the highest numbers of early voters.¹³ To maximize efficient use of interpretation services, and for the first few years of the Program, the NYCCEC will provide interpretation for the full day on the last two weekend days before Election Day for any U.S. presidential primary, general, or special election for a Citywide elective office or any statewide elective office.

As more data about Early Voting utilization is gathered, should that data indicate that demand is higher on other days, NYCCEC would consider providing interpretation services on additional days or at additional elections. Appendix B lists possible Early Voting poll sites that may have been selected for services using the NYCBOE November 2019 list of sites.

Operations

All Program interpreters and support staff will be trained by the NYCCEC prior to each election. Training content will emphasize non-electioneering principles, using the NYCBOE's anti-

¹³ 20,615 votes in last weekend vs. 12,522 in first weekend in NYC EV. <https://vote.nyc/important-notice/early-voting-check-ins>.

electioneering content, voting instructions, voter privacy, and information about the City's election operations. Interpreters will also receive applicable voting and election day terminology in each Program Eligible Language.

Prior to each election, NYCCEC will work with each targeted early voting and Election Day poll site to identify a location where interpreters can set up their tables inside the building, but outside the poll site room and guard rail.

The role of interpreters will include: setting up their designated location, displaying clear signage, and preparing to serve voters. Interpreters will be outside of the voting area, answering LEP voters' questions and, if requested, accompany voters inside to interpret and assist voters in navigating the poll site and casting a ballot.

The NYCCEC will provide signs, tracking forms, and other helpful information for interpreters to aid them in serving voters with limited English proficiency.

Advisory Committee

As mandated by the Charter, NYCCEC will establish a Language Assistance Advisory Committee (LAAC) to provide recommendations for the development and implementation of the Program and assist the NYCCEC to promote public education and awareness regarding the Program. More specifically, the NYCCEC will develop a plan to notify the public of the languages and poll sites covered by the program in advance of each election. Such plan will include multilingual outreach materials to inform voters of the languages offered at poll sites and notify the public about their rights to interpreter assistance.

Appendix A: Hypothetical List of Poll Sites Covered on Election Day (1 Day) Applying Methodology to November 2019 NYCBOE Listed Poll Sites, With Number of CVALEP for Each Language Near Poll Sites (Assuming ~100 Sites)

Language	County	PUMA	CB	Site Name	Site Address	18+ CVALEP
Russian	Kings	4018	13	Shorefront YM-YWHA	3300 Coney Island Avenue	3373
Russian	Kings	4018	13	PS 209	2609 East 7th Street	1804
Russian	Kings	4016	15	PS 52	2675 East 29th Street	1796
Russian	Kings	4017	11	PS 128	2075 84th Street	1712
Russian	Kings	4018	13	William E. Grady CTE High School	25 Brighton 4th Road	1671
Russian	Kings	4016	15	PS 234 IS	1875 East 17 Street	1652
Russian	Kings	4018	13	Trump Village Bldg 7A	2942 West 5 Street	1405
Russian	Kings	4016	15	Bay Academy-IS 98	1401 Emmons Avenue	1344
Russian	Kings	4017	11	PS 177	346 Avenue P	1237
Russian	Kings	4017	11	PS 682	50 Avenue P	1210
Russian	Kings	4016	15	PS 206	2200 Gravesend Neck Road	1147
Russian	Kings	4018	13	PS 90	2840 West 12th Street	1110
Russian	Kings	4018	13	Seacoast Towers	1311 Brightwater Avenue	1048
Russian	Kings	4018	13	PS 188	3314 Neptune Avenue	1035
Russian	Kings	4016	15	St. Marks School	2602 East 19th Street	1029
Russian	Queens	4108	06	JHS 157-Stephen A Halsey	63-55 102 Street	1018
Russian	Kings	4017	11	IL Centro (Fiao)	8711 18th Avenue	998
Russian	Queens	4108	06	PS 175-Lynn Gross Discovery School	64-35 102 Street	978
Russian	Kings	4018	13	Trump Village Bldg 3A	444 Neptune Avenue	971
Russian	Kings	4016	15	PS 286	2525 Haring Street	958
Russian	Kings	4018	15	Marlboro Memorial Post	300 Avenue X	951
Russian	Kings	4014	12	PS 226	6006 23rd Avenue	942
Russian	Kings	4015	14	PS 197	1599 East 22 Street	923
Russian	Kings	4017	11	IS 96	99 Avenue P	910

Russian	Kings	4016	15	PS 254	1801 Avenue Y	878
Russian	Kings	4016	15	PS 238	1633 East 8th Street	866
Russian	Queens	4108	06	PS 139-Rego Park	93-06 63 Drive	842
Russian	Kings	4016	15	PS 195	131 Irwin Street	833
Russian	Kings	4008	05	PS 346	1400 Pennsylvania Avenue	832
Russian	Kings	4016	15	PS 153	1970 Homecrest Avenue	800
Russian	Kings	4016	15	James Madison HS	3787 Bedford Avenue	783
Russian	Kings	4018	15	PS 216	350 Avenue X	769
Russian	Queens	4108	06	PS 206-Horace Harding School	61-02 98 Street	735
Russian	Kings	4015	14	Agudath Sr Ctr	817 Avenue H	710
Russian	Kings	4018	13	Youth Center	2739 Harway Avenue	704
Russian	Kings	4015	14	Ed R Murrow HS	1600 Avenue L	690
Russian	Kings	4008	05	Vandalia Ctr	47 Vandalia Avenue	664
Russian	Kings	4018	15	JASA Comm Ctr	161 Corbin Place	663
Russian	Kings	4015	14	St. Brendan Senior Apartments L.P.	1215 Avenue O	649
Total						42640

Language	County	PUMA	CB	Site Name	Site Address	18+ CVALEP
Haitian Creole	Kings	4015	17	PS 269	1957 Nostrand Avenue	952
Haitian Creole	Queens	4105	13	PS 34-John Harvard	104-12 Springfield Boulevard	832
Haitian Creole	Kings	4009	18	PS 68 JHS	956 East 82 Street	779
Haitian Creole	Kings	4015	14	PS 152/PS 315	725 East 23 Street	736
Haitian Creole	Kings	4009	18	PS 276	1070 East 83rd Street	615
Haitian Creole	Kings	4009	18	Canarsie HS	1600 Rockaway Parkway	609
Haitian Creole	Kings	4015	14	Brooklyn College Roosevelt Hall	2946 Bedford Avenue	607
Haitian Creole	Kings	4009	18	PS 251	1037 East 54th Street	532
Haitian Creole	Kings	4009	18	PS 114	1077 Remsen Avenue	485
Haitian Creole	Kings	4010	17	The Joan Snow Pre-K Center	3610 Glenwood Road	477
Haitian Creole	Kings	4009	18	PS 115	1500 East 92nd Street	461
Haitian Creole	Kings	4009	18	PS 203	5101 Avenue M	428
Total						7513

Language	County	PUMA	CB	Site Name	Site Address	18+ CVALEP
Italian	Kings	4017	11	PS 227 JHS	6500 16th Avenue	440
Italian	Queens	4103	07	PS 184- Flushing Manor	163-15 21 Road	346
Italian	Kings	4013	10	PS 201 JHS	8010 12th Avenue	328
Italian	Queens	4103	07	JHS 185- Edward Bleeker	147-26 25 Drive	316
Italian	Queens	4113	10	PS 207- Rockwood Park	159-15 88 Street	313
Italian	Queens	4103	07	PS 79-Francis Lewis	147-27 15 Drive	308
Italian	Queens	4110	05	PS 87-Middle Village	67-54 80 Street	300
Italian	Kings	4017	11	PS 186	7601 19th Avenue	292
Italian	Kings	4017	11	PS 205	6701 20th Avenue	278
Total						2921

Language	County	PUMA	CB	Site Name	Site Address	18+ CVALEP
Arabic	Kings	4016	15	Sephardic Comm Ctr	1901 Ocean Parkway	292
Arabic	Kings	4013	10	PS 331	7002 4 th Avenue	274
Arabic	Kings	4013	10	PS 170	619 72 nd Street	227
Arabic	Kings	4016	15	PS 234 IS	1875 East 17 Street	222
Arabic	Kings	4013	10	Telecomm HS	350 67 th Street	221
Arabic	Queens	4101	01	PS 70-Queens	30-44 43 Street	189
Arabic	Kings	4017	11	IL Centro (Fiao)	8711 18 th Avenue	187
Total						1612

Language	County	PUMA	CB	Site Name	Site Address	18+ CVALEP
Yiddish	Kings	4001	01	IS 71 -Juan Morel Campos	215 Heyward Street	3081
Yiddish	Kings	4001	01	Taylor Wythe Comm Ctr	80 Clymer Street	1192
Yiddish	Kings	4014	12	Boro Park YM-YWHA	4912 14 Avenue	751
Yiddish	Kings	4014	12	PS/IS 180	5601 16th Avenue	733
Yiddish	Kings	4001	01	Indep Towers Senior Center	114 Taylor Street	719
Yiddish	Kings	4014	12	PS 223 IS	4200 16 th Avenue	513
Total						6989

Language	County	PUMA	CB	Site Name	Site Address	18+ CVALEP
Polish	Kings	4001	01	McGuiness Sr Ctr	715 Leonard Street	760
Polish	Kings	4001	01	JHS 126	424 Leonard Street	427
Polish	Queens	4110	05	Holy Cross Church	61-21 56 Road	357
Polish	Kings	4001	01	St. Cecilia	24 North Henry Street	326
Polish	Kings	4001	01	Polish Slavic Culture Center	177 Kent Street	318
Polish	Queens	4110	05	PS 88-Seneca	60-85 Catalpa Avenue	304
Total						2492

Language	County	PUMA	CB	Site Name	Site Address	18+ CVALEP
Urdu	Kings	4015	14	Agudath Sr Ctr	817 Avenue H	347
Urdu	Kings	4018	13	William E. Grady CTE High School	25 Brighton 4th Road	341
Urdu	Kings	4015	14	PS 217	1100 Newkirk Avenue	293
Urdu	Kings	4014	12	PS 99	1120 East 10 Street	287
Urdu	Queens	4103	07	PS 244-Active Learning Elementary School	137-20 Franklin Avenue	226
Urdu	Kings	4014	12	PS 62 JHS	700 Cortelyou Road	200
Total						1694

Language	County	PUMA	CB	Site Name	Site Address	18+ CVALEP
Bengali	Kings	4014	12	PS 179	202 Avenue C	688
Bengali	Kings	4014	12	PS 230	1 Albemarle Road	436
Bengali	Bronx	3709	09	PS 102 Joseph O. Loretan	1827 Archer Street	367
Bengali	Bronx	3709	09	PS 119	1075 Pugsley Avenue	367
Bengali	Bronx	3706	07	PS 56	341 East 207 Street	327
Total						2185

Language	County	PUMA	CB	Site Name	Site Address	18+ CVALEP
French	Bronx	3708	04	PS 90 The Family School	1116 Sheridan Avenue	96
French	Queens	4107	04	Lefrak City Apartments	96-10 57 Avenue	89
French	Kings	4015	17	PS 269	1957 Nostrand Avenue	81
French	Kings	4013	10	PS 58	330 Smith Street	80
French	Kings	4010	14	Erasmus Hall HS	911 Flatbush Avenue	71
Total						417

Language	County	PUMA	CB	Site Name	Site Address	18+ CVALEP
Chinese	Richmond	3903	01	PS 13 M.L. Lindemeyer	191 Vermont Avenue	276
Chinese	Richmond	3902	02	PS 69 Daniel D. Tompkins	144 Keating Place	269
Chinese	Richmond	3903	01	PS 57 Hubert H. Humphrey	140 Palma Drive	264
Chinese	Richmond	3902	02	PS 39 Francis J. Murphy Jr.	99 Macfarland Avenue	211
Total						1020

Language	County	PUMA	CB	Site Name	Site Address	18+ CVALEP
Korean	New York	3803	10	PS 116	210 East 33 Street	163
Korean	Richmond	3902	02	PS 54 Charles W. Leng	1060 Willowbrook Road	152
Korean	Richmond	3902	02	Jerome Parker Campus CSI HS School	100 Essex Drive	142
Total						457

Appendix B: Hypothetical List of Poll Sites Covered During Early Voting (2 Days) Applying Methodology to November 2019 NYCBOE Listed Poll Sites, With Number of CVALEP for Each Language Near Poll Sites (Assuming 25 Early Voting Sites, Using Same Proportion as Table 3)

Language	County	Site Name	Site Address	18+ CVALEP
Russian	Brooklyn	Coney Island YMCA	2980 West 29th Street, Brooklyn, NY 11224	18711
Russian	Brooklyn	James Madison HS	3787 Bedford Avenue, Brooklyn, NY 11210	18583
Russian	Brooklyn	FDR HS	5800 20 Avenue, Brooklyn, New York 11204	9468
Russian	Queens	Rego Center Community Room	61-00 97 Street	4999
Russian	Brooklyn	Midwood HS	2839 Bedford Avenue, Brooklyn, NY 11210	4441
Russian	Brooklyn	New Utrecht HS	1601 80th Street, Brooklyn, NY 11214	3075
Russian	Queens	Helen Marshall Cultural Center at Queens Borough Hall	120-55 Queens Boulevard	2279
Russian	Queens	Queens College, City University of New York	65-30 Kissena Boulevard	1597
Russian	Brooklyn	Special Creek Educational Campus	1065 Elton Street, Brooklyn, New York 11239	1301
Russian	Brooklyn	Our Lady of Perpetual Help	552 59th Street, Brooklyn, NY 11220	1244
Total Sites=10				65698
Haitian Creole	Brooklyn	Midwood HS	2839 Bedford Avenue, Brooklyn, NY 11210	6029
Haitian Creole	Brooklyn	Canarsie HS	1600 Rockaway Parkway, Brooklyn, NY 11236	3210
Haitian Creole	Brooklyn	Tilden HS	5800 Tilden Avenue, Brooklyn, New York 11203	2514
Total Sites=3				11753
Italian	Brooklyn	FDR HS	5800 20 Avenue, Brooklyn, New York 11204	2612
Italian	Brooklyn	New Utrecht HS	1601 80th Street, Brooklyn, NY 11214	2031
Total Sites=2				4643

Arabic	Brooklyn	James Madison HS	3787 Bedford Avenue, Brooklyn, NY 11210	1768
Arabic	Brooklyn	Our Lady of Perpetual Help	552 59th Street, Brooklyn, NY 11220	1248
Total Sites=2				3016
Yiddish	Brooklyn	Our Lady of Perpetual Help	552 59th Street, Brooklyn, NY 11220	4037
Yiddish	Brooklyn	Williamsburg Community Center	195 Graham Avenue, Brooklyn, New York 11206	2570
Total Sites=2				6607
Polish	Queens	Board of Elections - Queens Voting Machine Facility Annex	66-26 Metropolitan Ave	2678
Polish	Brooklyn	Williamsburg Community Center	195 Graham Avenue, Brooklyn, New York 11206	2452
Total Sites=2				5130
Urdu	Brooklyn	Midwood HS	2839 Bedford Avenue, Brooklyn, NY 11210	1732
Total Sites=1				1732
Bengali	Brooklyn	Park Slope YMCA (Armory)	361 15 Street, Brooklyn, New York 11215	3102
Total Sites=1				3102
French	Manhattan	PS 175	175 West 134th Street, New York, NY 10030	448
Total Sites=1				448
Chinese	Staten Island	College of Staten Island	2800 Victory Boulevard, Staten Island, NY 10314	1184
Total Sites=1				1184
Korean	Manhattan	JHS 116	210 East 33rd Street, New York, NY 10016	783
Total Sites=1				783

Glossary

WORD or PHRASE	DEFINITION
Administrative data	Information or data collected by an agency that is derived from the operation of administrative systems to assess trends and allocation of resources.
American Community Survey (ACS)	<p>An annual U.S. Census survey that provides social and economic demographic data on communities, including language(s) spoken at home and English proficiency.</p> <p>It is conducted every month, every year, and administered by the U.S. Census Bureau. The ACS is sent to a random sample of addresses in the 50 states, District of Columbia, and Puerto Rico. Data collected includes social, economic, housing and population data. The data is available for the nation, states, counties and other geographic areas down to the block group level. ACS data helps local officials, community leaders, and businesses understand the changes taking place in their communities.</p>
Census tract	Census tracts are small, relatively permanent statistical subdivisions of a county, and are defined for the purpose of taking the census.
CVALEP	Citizen of voting age with limited English proficiency.
Demographic characteristics [or Demographic information]	The study of human populations, including births, deaths, income, education migration, labor and other factors which describe changing structure of human populations.
Designated citywide languages (DCL)	A list of the top ten most widely spoken languages in the City of New York by residents who are limited English proficient, based on ACS and Department of Education data. As of April 2020, the DCL are: 1.Spanish, 2.Chinese (Cantonese, Mandarin) 3.Russian, 4.Bengali, 5.Haitian Creole, 6.Korean, 7.Polish, 8.French, 9.Urdu, and 10.Arabic.
Early voting	A nine day period of in-person voting beginning on the second Saturday prior to Election Day and ending on the Sunday prior to Election Day.
Election day	The last day on which voters may cast a ballot. Absentee ballots and early voting ballots may be cast in advance of Election Day.
Election District (ED)	An electoral district, also known as an election district, legislative district, or voting district, (election) precinct, electoral area, or electorate, is an administrative subdivision of a larger state (a country, administrative region, or other political entity).
Eligible	Having the right to do or obtain something; satisfying the appropriate conditions.

General Election	An election to choose among candidates nominated in a primary (or by convention, caucus or petition) for federal state and/or local office. Measures such as proposed changes in law (ex. referendums and other government mandates), and proposals to borrow money for public projects may also be put on the ballot in a general election.
Geographic Information System (GIS)	System designed to capture, store, manipulate, analyze, manage, and present all types of geographical data.
Interpretation services	Facilitation of oral communication, either simultaneously or consecutively, between users of different languages.
Interpretation services	Facilitation of oral communication, either simultaneously or consecutively, between users of different languages.
Language access	Equal access to public services by individuals with limited English proficiency.
Language Assistance Advisory Committee (LAAC)	The Language Assistance Advisory Committee is responsible for providing recommendations for the development and implementation of the poll site language assistance program, which will provide bilingual oral interpretation services for certain limited English proficient voters at elections held in New York City.
Limited English proficiency (LEP)—as used by ACS (see definition above)	A person's English proficiency as determined by the ACS. The ACS asks three questions to assess languages spoken by each person who lives in the home: whether people speak a language other than English; if yes, which language they speak; and how well they speak English. The question about English proficiency states: "How well does this person speak English?" People can answer "Very well," "Well," "Not well" or "Not at all." LEP is defined as anyone who does not answer "very well."
Poll Site	A location assigned to voters for in-person voting.
Primary Election or Primary	An election held on the fourth Tuesday in June to determine party nominations for the General Election. Only registered party members can participate in a political party's primary election unless political party rules state otherwise.
Public hearing	An official meeting where members of the public hear the facts about a planned service and give.
Special Election	An election scheduled at an irregular time to fill a vacancy in an elective office.
Translation	Written transfer between two languages.
U.S. Census	Official population count in the United States, which occurs every 10 years.
Voting Rights Act of 1965 (VRA)	Federal civil rights law that protects minorities from discriminatory voting practices. Initially, the VRA only protected racial minorities, but in 1975, Congress extended its protections to members of "languages minorities,"

	including voters who speak Spanish, Native American languages, Alaskan Native languages, and Asian languages.
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