

NYC Civic Engagement Commission: Methodology for Poll Site Language Assistance

Frequently Asked Questions

Languages Served

- ❖ What languages will the Civic Engagement Commission (NYCCEC) provide services in?
 - Arabic, Bengali, Chinese (Cantonese, Mandarin), French, Haitian Creole, Italian, Korean, Polish, Russian, Urdu, and Yiddish¹.

- ❖ Why is the NYCCEC providing services in these languages?
 - Under the Charter, the NYCCEC can only provide interpretation services in a language if: (1) it is a designated citywide language; or (2) it is spoken by a greater number of LEP New Yorkers than the lowest ranked designated citywide language and at least one poll site has a significant concentration of speakers of such language with LEP.²
 - This methodology ensures service for all languages that are eligible under the Charter.

- ❖ What language assistance services does the Board of Elections provide?
 - The NYC Board of Elections currently provides language assistance in the following counties and languages:
 - New York: Spanish, Chinese (Cantonese, Mandarin)
 - Kings: Spanish, Chinese (Cantonese, Mandarin)
 - Queens: Spanish, Chinese (Cantonese and Mandarin), Korean, Bengali, Hindi, and Punjabi
 - Bronx: Spanish
 - Richmond: Spanish

- ❖ When will the NYCCEC begin providing interpretation services?
 - The general election held on November 3, 2020. This methodology will be used to inform how interpretation services will be provided this November and for all elections thereafter.

¹ This analysis is based on 2014-2018 American Community Survey 5-year estimates. The program eligible languages may change to reflect changes in the ACS, and/or changes in the designated citywide languages.

² Although Yiddish and Italian are not designated citywide languages, both have more speakers than the lowest ranked designated citywide language and therefore are eligible to be served under this program.

- ❖ Will the NYCCEC provide interpretation services during the early voting period?
 - 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.
 - The NYCCEC will consider providing interpretation services on additional early voting days after considering data about early voting utilization over time.

Data Used

- ❖ What data is the NYCCEC relying on to design this methodology?
 - For citywide estimates, this methodology uses current data from the American Community Survey (ACS) 2014-2018 5-year estimates.
 - This methodology also uses the American Community Survey Census Tract 2013-2017 5-year Public Use Microdata Samples for poll site level analysis; this is the most current and accurate data available on resident New Yorkers at the neighborhood level.
 - In addition, the methodology uses data from the Board of Elections on the location of election districts and poll sites.

- ❖ Why is the NYCCEC using data from the American Community Survey?
 - The NYCCEC is using ACS 5-year estimates as they provide a smaller margin of error than 1-year estimates and have an increased statistical reliability for smaller geographic areas and small population groups.
 - The ACS collects samples from 3,143 counties and county equivalents in the U.S. Since 2011, the ACS has sampled 3.54 million housing unit addresses in the U.S. The ACS gathers the following social and economic characteristics needed for the methodology: age, citizenship status, language spoken at home, and English proficiency. No other survey comes close to the scope and breadth of the ACS.

- ❖ Why is the NYCCEC using American Community Survey data about citizenship and voting age? Why not use data about residents and younger New Yorkers? Why not use data on ethnicity and race?
 - The goal of the Poll Site Language Assistance Program is to serve registered voters with limited English proficiency.
 - On an annual basis, the ACS provides a snapshot of changes in this population. In the early part of the decade, the ACS showed the CVALEP population growing by 7,500 annually, by 12,000 annually in the middle part of the decade, and by 25,000 in the most recent period. Thus, the ACS is able to track how this population changes each year – the average increase over the decade was roughly 10,000 per year.

- The best indicator of limited English proficiency in the ACS is a measure of how well a person speaks English. The NYCCEC uses this variable in conjunction with language spoken at home to determine the spread of languages across the City. The ethnic background/self-identified race of individuals is not relevant for data analysis.
- ❖ How often does the U.S. Census Bureau update the American Community Survey? And are there “gaps” in the data because it is not updated frequently enough?
 - The ACS is conducted each year, and it takes several months to prepare the data for public use. If the most recent data were used for the methodology analysis of the CVLEP population, the data would be no more than 14 months old. At the neighborhood level, there is nothing else available on the CVLEP population that would be more current or accurate than the 5-year estimates.
- ❖ If a New Yorker recently became eligible to vote (through naturalization or by turning 18-years-old) would that person show up in the most recent American Community Survey data?
 - If a New Yorker recently became eligible to vote through naturalization or by turning 18-years-old, the most recent ACS sample would reflect this emerging voter population. In the early part of the decade, the ACS showed the naturalized population growing by 15,000 annually, by 37,000 annually by the middle of the decade, and by 45,000 in the most recent period. Thus, the ACS is able to track how this population changes each year – the average increase over the decade was 33,000 annually.
- ❖ Will the NYCCEC update this methodology to incorporate new data from the American Community Survey?
 - The NYCCEC will review its analysis annually to incorporate data from the most recent American Community Survey 5-year estimates.
 - The NYCCEC is charged with reviewing this methodology on or before September 1, 2022 and at least every five years thereafter.

Additional Data Sources

- ❖ Will the NYCCEC use a “surname analysis” of voter registration records? Are these analyses evidence-based and reliable?
 - The NYCCEC will not utilize surname analysis in this methodology.
 - The utilization of surname analysis is an accepted practice to increase accuracy, approved by the Department of Justice over a decade ago. Surname analysis is used as supplementary information to voter registration data or data from the U.S. census. It is never used by itself. If the NYCCEC

uses surname data in the future, it would only be as a secondary source to increase the overall reliability of poll site selections.

- ❖ Will the NYCCEC use data about the utilization of services?
 - The NYCCEC will not use utilization data for selecting poll sites for November 2020. Like surname data, utilization data is a secondary source of data to help validate the poll sites chosen. The NYCCEC will begin to review utilization data as one indicator of demonstrated need, after three general election cycles.

Targeting Poll Sites

- ❖ How does the NYCCEC determine the number of poll sites it will serve for each language?
 - The NYCCEC uses a proportionality approach to allocate poll sites per program eligible language based on each particular language's percentage share of the total CVLEP population.³
- ❖ How does the NYCCEC determine which poll sites it will serve?
 - Interpretation services will be provided in a given program eligible language at poll sites with the highest concentration of persons that speak that particular language and are citizens of voting-age with limited English proficiency. The number of poll sites that receive services in a particular program eligible language will depend on that language's percentage share of the CVLEP population compared to other languages served by the Program.
 - The overall number of poll sites served will depend on the total amount of funds allocated to the program.

Training and Recruitment of Interpreters

- ❖ How will the NYCCEC recruit interpreters?
 - The NYCCEC will recruit interpreters in all program eligible languages through social media channels, job-posting websites, and outreach to community-based organizations, community-based language co-ops, and additional avenues that surface out of the Language Assistance Advisory Committee (LAAC).
- ❖ How will the NYCCEC ensure interpreters are properly trained?
 - The Charter requires the NYCCEC to promulgate rules establishing minimum standards and training requirements for interpreters. All interpreters will be

³ For example, if Russian speakers make up 39% of the total CVLEP population, interpretation in Russian will be provided at 39 out of 100 poll sites.

screened for customer service skills and receive training similar to the training the BOE provides to interpreters. This includes training on non-electioneering and ensuring voter privacy.

- Interpreters will be assessed for written and spoken fluency in English and at least one of the program eligible languages. Returning interpreters will continue to be screened on a yearly basis to maintain quality within the program.
 - The interpreter training will be reviewed and vetted by members of the LAAC prior to utilization.
- ❖ Will the public be able to provide feedback on interpretation services?
- The NYCCEC will hold annual public hearings on the training content and quality of interpretation services to allow the public to provide feedback on need and/or experience.
 - The NYCCEC convenes the LAAC quarterly, individuals interested in joining the committee may review the criteria on the NYCCEC website and submit an application.
 - The public is encouraged to submit comments and feedback through the NYCCEC's website to ensure the program is reflective of community need and experience.

Outreach

- ❖ How will the NYCCEC conduct outreach to amplify awareness of the Poll Site Language Assistance Program?
- The NYCCEC will share program eligible languages and correlating poll sites on the NYCCEC's website, build partnerships with CBOs and Faith-based organizations (FBO) to widen distribution of outreach materials, organize days of action leading up to Election Day, and place advertisements in community and ethnic media.
 - The NYCCEC will also consult the LAAC to develop an outreach strategy and timeline that focuses on building long-term relationships with CBOs and FBOs that have ties to the language communities the Program serves.