Agency Language Access Implementation Plan (LAIP) 2018

Department of Citywide Administrative Services
For more information, contact the DCAS Language Access Coordinator: Latesha Parks - lmparks@dcas.nyc.gov or 212-386-6313.
I. Agency Mission and Background

The Department of Citywide Administrative Services (DCAS) ensures that New York City agencies have the critical resources they need to provide the best possible services to the public. Though the bulk of our efforts support other agencies, DCAS offers select services directly to the public, such as civil service administration, opportunities to sell to and buy from the City, and a safe and clean environment in the over fifty (50) DCAS-managed buildings citywide. DCAS is deeply committed to ensuring these public-facing services accommodate the vibrant, diverse array of New Yorkers and their needs.

In-Person and Call-in Services

The VLB (Volunteer Language Bank) and OTP (Over-the-Phone) services will be available at points where DCAS meets the public to provide language access to persons with limited English proficiency (LEP) whenever feasible. DCAS has several CTACs (Citywide Testing & Application Centers) throughout the five boroughs of New York City. CTACs offer the public the opportunity to apply, schedule and take exams for civil service positions. In addition, there are two locations where the public can apply and get information on exam schedules and status. The locations of the greatest points of contact for the agency are listed below:

<table>
<thead>
<tr>
<th>Point-of-Contacts</th>
<th>Locations</th>
<th>Managing LOS within DCAS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Civil Service Application Center</td>
<td>2 Lafayette Street New York, NY</td>
<td>Citywide Human Capital</td>
</tr>
<tr>
<td>Civil Service Application Center</td>
<td>210 Joralemon Street, Brooklyn, N.Y.</td>
<td>Citywide Human Capital</td>
</tr>
<tr>
<td>Civil Service Application Center</td>
<td>18-35 Queens Blvd., Forest Hills, NY</td>
<td>Citywide Human Capital</td>
</tr>
<tr>
<td>Civil Service Application Center</td>
<td>135 Canal Street, Staten Island, NY</td>
<td>Citywide Human Capital</td>
</tr>
<tr>
<td>Civil Service Examinations Window</td>
<td>1 Centre Street, 14th Floor New York, NY</td>
<td>Citywide Human Capital</td>
</tr>
<tr>
<td>Civil Service Certifications Window</td>
<td>1 Centre Street, 21st Floor New York, NY</td>
<td>Citywide Human Capital</td>
</tr>
<tr>
<td>Security Posts in DCAS Buildings</td>
<td>Multiple locations citywide</td>
<td>Administration</td>
</tr>
</tbody>
</table>
II. Language Access Policy and Goals

The goal of the Department of Citywide Administrative Services’ Language Access Plan is to ensure the public has access to our exams and services regardless of their English proficiency. In formulating the Language Access Implementation Plan (LAIP), DCAS established the following guiding principles for the plan to address the public’s needs, now and in the future. As an agency we aim to:

1. Communicate effectively with all DCAS customers;
2. Ensure persons with LEPs are accommodated and respected;
3. Provide translation and interpretation services to the public seeking core DCAS services;

This document, the DCAS Language Access Plan (LAP), addresses Local Law 30 and outlines how DCAS will accommodate persons with limited English proficiency (LEP). As the City’s population continues to evolve and diversify, DCAS will review its plan annually to ensure it supports the changing needs of the city.

The Department of Citywide Administrative Services will ensure its LAP supports the community we serve. We have identified several ways in which to meet this objective:

1. Develop a survey to identify how many DCAS employees speak languages other than English to establish our Volunteer Language Bank (VLB);
2. Train frontline workers and managers on language access policies and procedures;
3. Post informational signage about the availability of free interpretation services in areas frequented by the public, such as our computer testing centers and City stores;
4. Provide interpretation and translation services, including the use of telephonic services for the top languages as well as other languages as needed.

III. Limited English Proficiency Population Assessment (LEP)

In creating its LAP, DCAS applied the Four Factor Analysis created by the US Department of Justice (DOJ);

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

The population that DCAS serves is reflective of the general population of New York City. In evaluating its target audience, DCAS drew from population studies produced by the Department of City Planning (DCP), whose studies identify the top languages spoken in the City other than English. These languages are Spanish, Chinese, Russian, Korean, Italian, and Haitian Creole, Arabic, Urdu, French and Polish.
**Factor 2: The frequency with which LEP individuals come into contact with the agency**

DCAS plans on improving its processes to ensure we capture and maintain detailed information about persons with LEP seeking assistance in our customer service areas. This will be achieved by establishing a liaison in DCAS point of contact areas who will report back to the Language Access Coordinator (LAC) with relevant data and information.

**Factor 3: The importance of the benefit, service, information, or encounter to the limited English proficient person**

Because DCAS administers testing for New York City civil service titles, it is imperative that we can communicate with potential candidates who are interested in learning more about a career with New York City.

Additionally, on occasion, DCAS interacts with members of the general public who may be interested in buying, selling, and leasing property from the City of New York. Having these resources available will allow DCAS to interact effectively with a wider audience.

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

DCAS will offer translation services, and when feasible, over-the-phone interpretation services through the citywide service contract managed by the Department of Information Technology & Telecommunications (DOITT). The contracted services, provided by the vendor Geneva Worldwide Translation Services will be used when the VLB is unable to fulfill the service requested.

DCAS will use several data sources to assess our language access needs. These sources include: U.S Census Bureau’s most recent American Community Surveys, and 311 data on language access requests.

DCAS will begin to assess which of these languages are requested the most in areas where we service the public. We will accomplish this assessment by ensuring that employees who service public areas are reporting requests for translation and interpretations to the LAC on a monthly basis. The LAC will in turn gather the stats to form a complete assessment.

Some public-facing services, however, will not be eligible for translation or interpretation because of the nature of the service. These exemptions include:

- **Civil Service Administration** – civil service exams and their notifications will continue to be produced only in English, as the City requires job candidates hold a level of proficiency in the English language. DCAS will provide translated communications to inform LEPs of the English proficiency requirement.
- **Legal and Business Transactions** – DCAS will continue to conduct all legal and business transactions with public and private entities in English. These transactions include, but are not limited to, the areas of procurement, real estate services, contracted services, and municipal publications such as the City Record and the Green Book.
As the city continues to grow DCAS will adjust the plan to ensure the most commonly spoken languages remain the focus of our efforts.

IV. Provision of Language Services

The Agency LAC, working with DCAS Senior Management and Managers of correspondence, call, and walk-in centers, will be responsible for administering the agency’s implementation of the language access plan. The LAC will work with DCAS’s lines of services (LOS) to ensure the overall success of the plan and liaise with the Mayor’s Office of Immigrant Affairs (MOIA) on citywide language access issues and reporting.

DCAS will make the public aware of language access services with the use of signage at points of contact and on the DCAS website.

In the event of an emergency, DCAS will employ the help of its volunteers in the language bank to help disseminate important information. In instances where the emergency does not allow for this option, DCAS will use Ever bridge, the citywide mass communication company to provide emergency group communications to the LEPs.

In the event of public hearings hosted by DCAS, notices will be amended to notify members of the public that language access services will be made available upon request.

DCAS will utilize three tools to deliver language access services:

1. Volunteer Language Bank (VLB) – Using guidelines established by the Mayor’s Office of Immigrant Affairs, DCAS will develop a network of multi-lingual employees throughout the agency willing to volunteer their services. The VLB will be accessible to frontline employees to provide in-house interpretation services.

2. Translation and Over-The-Phone (OTP) Interpretation Services – DCAS will offer translation and over-the-phone interpretation services in the designated Citywide languages through the Citywide service contract managed by the DOITT and the VLB.

3. Translate Most Commonly Distributed Materials (MCD) - DCAS will continue to update its MCD to be reflective of the citywide languages.
V. Training

The LAC working with DCAS Senior Management and areas where language access services are requested will be responsible for administering the agency’s implementation and training of the plan. The LAC will work with DCAS lines of service (LOS) to ensure the overall success of the plan and liaise with the Mayor’s Office on Citywide language access issues and reporting.

DCAS will offer language access and plain language training to frontline staff that interact or correspond with the public, such as security officers and walk-in center staff. In addition, DCAS will disseminate the plan to all staff through its intranet site.

Language Access Training

Language access training will be given to frontline staff that interact with the public. DCAS will conduct the training, based on Citywide training models developed by the Mayor’s Office, which will include the following topics: overview of the plan, how to identify a client’s primary language, how to access tools for interpretation/translation services (VLB and OTP), how to work with interpreters, cultural sensitivity, and how to track and report language access interactions.

Training will begin in the third quarter of CY 2018. Periodic refresher training and training for new frontline staff will be administered on an as-needed basis. Senior Management, walk-in center Managers, and the Agency Language Access Coordinator will identify which staff will attend the training.

DCAS will update its new hire orientation to make employees aware of its language access plan, including encouraging new employees to join the Volunteer Language Bank if they are qualified. They as will current employees be advised to review the complete Language Access Plan, which is available online and on the DCAS intranet.
VI. Recordkeeping and Evaluation

DCAS will measure the performance and compliance of the plan by tracking point-of-contact reports as well as VLB, OTP and 311 usage reports. The data for the following indicators will be collected and analyzed monthly:

- **# of completed customer request for interpretation**
  - Over the phone through OTP services
  - Over the phone through VLB services
  - In person through OTP services
  - In person through VLB services

- **# of documents translated**
  - Language Summary
  - Languages accessed
  - % of translations by language
  - % of interpretations by language

- **311 Data**
  - # of language access complaints received via 311
  - # of requests for language access services via 311
  - record of how complaints were handled

Geneva Worldwide Translation Services will perform quality assurance reviews of translated documents as standard practice. DCAS plans on incorporating quarterly in-person or conference meetings with the vendor to discuss the reviews. In addition, DCAS will employ the VLB to perform internal reviews of translated documents. DCAS will also utilize Citywide translator certification models once available.
VII. Resource Analysis and Planning

DCAS will draw from several sources to implement the plan:

- Citywide Materials: DCAS will use standardized signage and materials provided by the Mayor’s Office, including the Language Identification Poster, Notice of Translation Services Poster, and various guidance documents.
- Citywide Services: DCAS will obtain translation and interpretation contracting services through a contract held by the Department of Information and Telecommunications (vendor: Geneva Worldwide Translation Services). In addition, DCAS will utilize Citywide training models when available.
- DCAS Staff: DCAS will draw from its talented, diverse workforce to establish and maintain the VLB.

VIII. Outreach and Public Awareness of Language Access Services

The Language Access Coordinator will attend outreach events relating to services provided by DCAS where they will interact with elected officials, and community organizations to gather important information about the changing needs of the LEP community. These meetings and events provide the perfect platform for DCAS to learn about changes in demographics and needs of the population.

DCAS will update its website to include translated documents we commonly provide to members of the public.

Outreach and public awareness is further enhanced by the translation feature available on our website. Visitors are able to read all the information on the site in the language they are most comfortable with.

IX. Language Access Complaints

DCAS has been fortunate to not have received any language access complaints in 2017. Language access requests or complaints are directed to the Language Access Coordinator via our internal website, MOIA and/or 311.

X. Implementation Plan Logistics

The New York City Language Identification Poster and the Notice of Translation Services signage, developed by the Mayor’s Office, will be used at points-of-contact to inform individuals with LEP that interpretation services are available. DCAS will also communicate its language access services through the DCAS website. DCAS staff who interact with the public will receive training and printed instructions on how to use the VLB and OTP services.
Document Translation

DCAS will utilize the services of Geneva Worldwide Translation Services, using plain language principles, to translate materials most commonly distributed to members of the public. Printed materials will be readily available in all the identified citywide languages. The documents will be available at relevant walk-in centers and posted online. Essential documents to be translated in CY 2018 are:

- DCAS Auto Action Frequently Asked Questions (FAQ)
- Civil Service Information Sheet
- DCAS Real Estate Services Information Sheet

The agency will periodically revisit the list to ensure the LEP population has adequate access to DCAS functions and services.

Implementation Timeline

DCAS will work diligently to execute the efforts set forth in this plan. The following is a summary of key milestones for plan implementation, listed by calendar-year quarter.

- CY 2018 OTP translation services will be available to all frontline staff
- CY 2018 Translation services signage posted at all public points-of-contact
- CY 2018 Begin LAP training for frontline staff
- CY 2018 Identify and translate essential documents
- CY 2018 Launch VLB for all frontline staff
- CY 2018 Report language access data in the Mayor’s Management Report
- CY 2019 Deliver cultural competency training based on Citywide model
- CY 2019 DCAS conducts LAP analysis for internal use

Website Translation