Language Access Implementation Plan Template (2021)

I. Agency name and agency language access coordinator

New York City Department of Environmental Protection

Language Access Coordinators:
Sara Pecker, Director of Special Projects & Initiatives
Eileen Alter, Deputy Director, Special Projects & Initiatives
https://www1.nyc.gov/site/dep/about/language-access.page

II. Agency mission and background

The New York City Department of Environmental Protection (DEP) protects public health and the environment by supplying clean drinking water, collecting and treating wastewater, and reducing air, noise, and hazardous materials pollution. DEP is a New York City agency of nearly 6,000 employees that manages and conserves the City’s water supply; distributes more than one billion gallons of clean drinking water each day to nine million New Yorkers and collects wastewater through a vast underground network of pipes, regulators, and pumping stations; and treats the 1.3 billion gallons of wastewater that New Yorkers produce each day in a way that protects the quality of New York Harbor. To achieve these mandates, DEP oversees one of the largest capital construction programs in the region. As the City agency responsible for New York City’s environment, DEP also regulates air quality, hazardous waste, and critical quality of life issues, including noise.

The Bureaus and Offices responsible for carrying out the agency’s mission each perform a level of “direct public service” with NYC residents and businesses through correspondence, community-based meetings, public hearings, issuance of publications and documents, telephone contact, web-based communication, or ongoing face-to-face interaction.

Bureau of Customer Services (BCS)

BCS is responsible for all functions related to water and sewer billing for residents of NYC and certain upstate communities. Additionally, the Bureau contracts for the installation of water meters in unsurcharged, unmetered buildings and the replacement of old meters and is installing an automatic meter reading system citywide. It inspects the work quality of water meters installed by private plumbers and enforces the city’s water use rules. BCS also manages consumer-oriented water conservation programs. The BCS Call Center has completed its upgrade of their Interactive Voice Response (IVR) system. The new enhancements include digital recording and monitoring of all calls for training and quality assurance purposes. Call routing is now available for callers requiring an account specialist, or for LEP customers needing language assistance.

BCS has a borough office in each of the five boroughs where customers can go to pay their water and sewer bills. The Borough Offices are located at the following addresses:

- 1932 Arthur Avenue, Bronx, NY
- 250 Livingston Street, Brooklyn, NY
Bureau of Environmental Compliance (BEC)

The Bureau of Environmental Compliance’s mission is the enforcement of environmental laws and regulations, which affect the health and safety of the public and environment. Specifically, the bureau enforces the City’s Asbestos regulations as well as the Air and Noise Codes. BEC is composed of the Division of Air & Noise Policy, Permitting and Enforcement and the Asbestos Control Program. These divisions respond to air and noise code complaints; inspect and track asbestos removal projects; and foster the goals of environmental protection. Responsibilities also include certifying asbestos handlers, inspecting and issuing operating certificates to stationary combustion and industrial process sources, and implementing the requirements of the Clean Air Act.

Bureau of Environmental Planning and Analysis (BEPA)

BEPA is responsible for conducting all environmental reviews for DEP in accordance with all applicable City Environmental Quality Review (CEQR) and State Environmental Quality Review (SEQR) regulations. In addition, this office provides technical assistance to other City agencies especially in the areas of air and noise quality and hazardous materials. The Office also provides technical assistance for the preservation of natural resources (wetlands remediation and development of natural landscaping plans) and conducts long range planning (population/employment, consumption, and demand/flow) for the agency. BEPA conducts strategic planning to help ensure appropriate forecasting, trend analysis, regulatory review, scientific modeling, and research. It oversees the development of a watershed/sewershed protection plan for Jamaica Bay, is continuing the work of the climate change task force, and helps DEP plan for the new growth stimulated by rezoning throughout the City.

Bureau of Police and Security (BPS)

The Bureau of Police and Security is responsible for protecting the New York City water supply and the associated critical infrastructure from terrorism, pollution, and crime. In addition, the Bureau is also responsible for establishing on-site procedures intended to minimize the potential impact on human health and the environment in the event of a hazardous material incident. The Bureau is divided into four divisions: the Police Department, which patrols the upstate water supply; the Security Division which employees private security guards for protecting in-city facilities; the Security Systems Engineering Division, which designs and implements security systems for the water supply system; and the Division of Emergency Response and Technical Assessment (DERTA), which responds to hazardous material emergencies within the city by evaluating the characteristics of the materials involved and making technical decisions concerning containment, abatement and disposal.

Bureau of Wastewater Treatment (BWT)

The Bureau of Wastewater Treatment maintains the chemical and physical integrity of NY Harbor and other local water bodies and sustains the continued use and viability of the NY water environment through: the removal of organic and toxic pollutants from the City’s wastewater; control of discharges...
from Combined Sewer Overflows and dry weather bypassing; optimum operation of treatment plant collections system; integration of watershed management concepts into facilities’ planning and design; and enforcement of a city-wide industrial pre-treatment and pollution prevention program. To achieve these water quality goals, the Bureau, with an administrative, technical, and field staff of approximately 1,850 employees, operates: 14 water pollution control plants treating an average of 1.3 billion gallons of wastewater a day; 96 pumping stations; 4 CSO retention facilities; 8 dewatering facilities; 490 sewer regulators; and 150 miles of intercepting sewers. The Bureau also manages the Harbor Survey Program for the routine sampling and analysis of the waters in NY Harbor.

**Bureau of Water and Sewer Operations (BWSO)**

The primary responsibilities of the Bureau of Water and Sewer Operations are: the operation, maintenance and protection of the City’s drinking water and wastewater collection (sewer) systems; the protection of adjacent waterways; and the development and protection of the Department’s Capital Water and Sewer Design Program. The Bureau also approves and inspects water and sewer connections performed by licensed plumbers and/or authorized contractors. In addition, the Bureau has overall responsibility for the approval and inspection of all public and private construction projects, which could impact on the City’s water or sewer systems. For this reason, anyone wishing to build a private sewer, to construct any type of structure on a City sidewalk, to discharge water from a below ground swimming pool into the sewer system, or to connect a service line with the City’s water or sewer system for any reason must receive the approval of this bureau. We are also responsible for maintaining and updating all water and sewer information records for the City of New York. Through the maintenance and repair of the City’s water and sewer systems, our field forces ensure: (1) that residences and businesses will have an adequate supply of potable water, (2) that there will be sufficient water for fire protection, and (3) that we will have a properly functioning wastewater collection system. Thus, the services we provide extend far beyond the routine day-to-day operation of the water and sewer systems, and include responding to many different problems and emergencies. These include: water main breaks; leaks from water and sewer mains; broken or inoperable fire hydrants; open hydrants; sewer backups; catch basin (street drainage); failures resulting in street flooding; and complaints of poor water pressure, discolored water, or water with taste or odor problems. BWSO is also responsible for the operation of the Staten Island Bluebelt. This is an ecologically sound, cost effective natural alternative to storm sewers, which occupies approximately 15 square miles of land in the South Richmond area of Staten Island. This project preserves streams, ponds and other wetland (“bluebelt”) areas, allowing them to perform their natural function of conveying, storing, and filtering storm water. These areas also provide important community open spaces and a diverse wildlife habitat.

**Bureau of Water Supply (BWS)**

The Bureau of Water Supply manages, operates, and protects New York City’s upstate water supply system to ensure the delivery of a sufficient quantity of high-quality drinking water. The Bureau is also responsible for the overall management and implementation of the provisions of the City’s $1.5 billion Watershed Protection Program resulting from the Watershed Memorandum of Agreement (MOA) and for ensuring the City’s compliance with the provisions of the Filtration Avoidance Determination. The Bureau conducts extensive monitoring of water quality, both within the City’s distribution system and throughout the upstate watersheds. In addition, the Bureau has responsibility for system planning,
engineering, management, and acquisition of lands, enforcement of watershed regulations, and security.

**Bureau of Public Affairs and Communications (BPAC)**

BPAC manages the public information, community outreach and legislative affairs of the Agency. It is responsible for all press and media inquiries, environmental education, special projects and initiatives, and production of all public information materials, both print and electronic. BPAC also manages the outreach for several regulatory programs including: the Municipal Separate Storm Sewer System Permit (MS4 Permit), Long-term Control Plans (LTCPs), the NYC Green Infrastructure Program, Superfund, Grease, and Asbestos. The Community Affairs Unit is the Agency’s primary liaison on all monitoring committees, citizen advisory committees, community outreach projects, and service inquiries. BPAC is the bureau that is point for Local Law (LL) 30. It reviews all agency publications to make sure the agency is in compliance with LL-30. These documents are reviewed with the originating bureaus to determine the need for translations into the ten top LEP languages. This initiative is ongoing.

**III. Agency language access policy and goals**

The goal of the Department of Environmental Protection’s policy around Language Access, is to provide meaningful language access to customers who interact with the agency for essential services and information, based on at least the 10 designated citywide languages; and to provide translations of its most widely distributed documents so that the Limited English Population (LEP) can have access to the same information as the English speaking population.

To enable the LEP population to speak to and interact with all DEP inspectors and public facing employees regardless of the language they speak, the agency has provided staff with telephones (and in the case of inspectors and emergency responders with mobile phones) with which they can access a telephonic interpretation service that covers almost 300 languages. The agency is and will continue to translate essential information and its most widely distributed documents into the ten citywide designated languages and has created a landing page on the DEP website for each of the 10 languages where the documents reside. Widely distributed documents will carry a sentence that directs speakers of the top 10 LEP languages to the appropriate landing page. Each document that is accessible from the landing page will have a short blurb describing its content to correspond to the document in English.

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

The Bureau of Customer Services (BCS) has five borough offices, one in each borough that provides customer service and inspectorial support to the general public. Customers can come in and speak with employees to schedule inspections, take out a permit, apply for our various programs, make payments and enter into payment agreements.

BCS also has various outreach events throughout the year in which customers can come to a location within their community to talk to representatives to discuss their water bills.

The BCS call center receives calls directly from customers or calls transferred from 311 to assist in various water related inquiries.
BCS has seen an increase in Language Access calls and in person requests. BCS inspectors have continued their use of the ‘I Speak’ cards and the Voiance telephonic interpretation service that can be accessed through their agency issued cell phone. All call center employees also have access to our Voiance telephonic-interpretation service. The employees that work in the borough offices and at community outreach events also have the ‘I Speak’ cards, Voiance, and certified bilingual employees available.

Distribution Science and Planning (DSP) within Water Quality/Bureau of Water Supply has two responsibilities for which documents are required to be translated: at-the-tap testing for lead and copper, where free testing kits are provided to the customer (these include sampling instructions, chain of custody forms, and result letters), and the annual *Drinking Water Supply and Quality Report* (DWSQR). All lead and copper documents have been translated into the required languages, except for result letters, which are translated upon request. The DWSQR was not translated in 2020 due to budget constraints but will be translated upon request.

For the lead program, the 311 form for requesting a test kit includes an option to request a different language. If a different language is requested, sampling instructions, chain of custody forms, and result letters are all supplied in the language of choice. The question on language became available in November 2016, and the number of requests by language are stored in the Lead Database and are summarized in the table below. If a person forgets to request a different language, the kit also includes a sheet in the ten languages instructing people to call if they would like translations sent to them.

<table>
<thead>
<tr>
<th>Year</th>
<th>ARABIC</th>
<th>BENGALI</th>
<th>CHINESE</th>
<th>FRENCH</th>
<th>HAITIAN CR</th>
<th>KOREAN</th>
<th>POLISH</th>
<th>RUSSIAN</th>
<th>SPANISH</th>
<th>URDU</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016*</td>
<td>3</td>
<td>1</td>
<td>2</td>
<td>4</td>
<td>2</td>
<td>16</td>
<td>46</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2017</td>
<td>1</td>
<td>6</td>
<td>37</td>
<td>4</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>16</td>
<td>46</td>
<td></td>
</tr>
<tr>
<td>2018</td>
<td>8</td>
<td>14</td>
<td>44</td>
<td>8</td>
<td>5</td>
<td>3</td>
<td>19</td>
<td>128</td>
<td>11</td>
<td></td>
</tr>
<tr>
<td>2019</td>
<td>30</td>
<td>88</td>
<td>52</td>
<td>19</td>
<td>12</td>
<td>5</td>
<td>1</td>
<td>34</td>
<td>345</td>
<td>23</td>
</tr>
<tr>
<td>2020</td>
<td>16</td>
<td>76</td>
<td>34</td>
<td>14</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>17</td>
<td>251</td>
<td>28</td>
</tr>
</tbody>
</table>

*2016 is from 11/13/16 onward

The DWSQR language requests (request for a hard copy in another language) have been tracked since 2004. In that time, we have not gotten any requests for a hard copy of the report in another language. In February of 2020, the 2019 Report was posted on the DEP website. As it was not translated, there were no hits for other languages on the website.

DSP has made use of telephonic interpretation when necessary. In 2020, we did not need to use the service, however, one employee in the unit who speaks Spanish spoke with about 30 customers.

Water Quality has made every effort to make sure all materials listed in Section 3 (translation) have been written in plain language. The DWSQR is also reviewed by BPAC. The Annual Drinking Water
Supply and Quality Report is written in plain language, as well as all materials for the at-the-tap lead monitoring program.

Language requests for the DWSQR are tracked in a spreadsheet by DWQO, and different language hits on the website are tracked by the web group. Requests for lead kit instruction in a different language are tracked in the Lead Database.

**Agency language access accomplishments and progress on goals from previous LAIP**

<table>
<thead>
<tr>
<th>Language Access Goal</th>
<th>Update</th>
</tr>
</thead>
<tbody>
<tr>
<td>Set quarterly LAIP review meetings with Bureau Language Access liaisons</td>
<td>ongoing</td>
</tr>
<tr>
<td>Identify and translate widely distributed documents</td>
<td>Complete</td>
</tr>
<tr>
<td>Send all translated documents out for secondary review</td>
<td>Complete</td>
</tr>
<tr>
<td>Develop descriptive blurbs for each translated document</td>
<td>Complete</td>
</tr>
<tr>
<td>Translate document descriptions</td>
<td>Complete</td>
</tr>
<tr>
<td>Develop Landing pages for top ten LEP translated documents on DEP website</td>
<td>Ongoing with initial documents posted as completed and new documents translated and added to the page as they are developed</td>
</tr>
<tr>
<td>Work with DERTA on development of their Right-to-Know (RTK) Video with closed captioning</td>
<td>Delayed by Covid-19 and will be reviewed again for necessity</td>
</tr>
<tr>
<td>Develop Plain Language Review portal for public facing documents</td>
<td>Complete</td>
</tr>
<tr>
<td>Plain Language Review Portal finalized</td>
<td>Complete</td>
</tr>
<tr>
<td>Design and develop landing pages for translated documents by language</td>
<td>Complete</td>
</tr>
<tr>
<td>Identify documents related to issuing permits, licenses and registrations</td>
<td>Complete</td>
</tr>
<tr>
<td>Translate all supporting documents</td>
<td>Complete</td>
</tr>
<tr>
<td>Post all translated supporting documents on the website</td>
<td>Complete</td>
</tr>
</tbody>
</table>
### BWT Goals

<table>
<thead>
<tr>
<th>Goal</th>
<th>Update</th>
</tr>
</thead>
<tbody>
<tr>
<td>Work with BPAC to translate all BWT forms and/or permits complete by the public into NYC target languages.</td>
<td>Done as of FY 2020</td>
</tr>
<tr>
<td>Work with BPAC to address requests for translation of new documents, e.g. COVID-19 health forms to be translated on as-needed basis.</td>
<td>One request from a vendor’s driver was resolved, and BPAC determined that the health form did not need to be translated and distributed, as the vendor was not considered “the public.”</td>
</tr>
</tbody>
</table>

### V. LEP population assessment

DEP’s population assessment is based on the number of ratepayers that we serve (830,000), as our interaction is primarily based on this population.

- **Factor 1:** the number or proportion of LEP persons in the eligible service population (demographic analysis, e.g., Census data)

  **BCS Borough Customer Service Offices (Five Borough Offices):**

  BCS Borough Offices determined that it provides direct service to approximately 77,000 walk-in customers each year (Due to Covid, 2020 was significantly less due to the offices being closed for 5 months to walk-in customers). Surveys show that approximately 1,500 customers are served each week at the BCS Borough Office locations. About 2% of these customers request language interpretation.

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

  **BCS Call Center:**

  According to the 2020 Voiance report, the Call Center responded to approximately 325,000 customers citywide. Reports and surveys collected by the Call Center Customer Service Representatives indicated that approximately 5% to 7% of all calls taken were in Spanish and/or Mandarin.

  **BCS Borough Offices and Call Center**

  The BCS Call Center and borough office encounter LEP customers on a daily basis. Due to the demand of Spanish callers, the Call Center has implemented a separate call queue that will field callers to certified Spanish representatives. If that queue is backed up in calls, other representatives will take the call and utilize the Voiance translation service to translate the calls. All of the borough offices and field inspectors will continue to utilize the telephonic interpretation service.

  The data for the BCS borough offices do not reflect the data needed for LEP customers due to COVID. The borough offices were closed to the public for several months due to the global
pandemic. LEP customers still had access to our Call Center and we continued to have an increase in LEP calls during that time.

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

The Call Center and borough offices are vital customer service operations. They provide information to LEP customers by assisting them in understanding billing issues, water conservation programs, payment inquiries, payment plans, lien sales and any other related water and wastewater issues. In addition, the Call Center provides follow-up calls to the LEP customers to explain billing adjustments, related information, and account updates.

If BCS was unable to provide LEP customers with this service, they would miss vital information given to the public. Many would not understand their bills or notices and most of all we would not be providing excellent customer service.

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

The Call Center has developed a cost-effective strategic plan to address the LEP customer language needs. BCS currently employs several representatives fluent in two of the most requested LEP languages, Spanish and Chinese. BCS continues to recruit new employees with multiple language skills and utilizes its Voiance Language Contract. Voiance is easily accessible when the requested language is not available at the time of the call. The clerical Associate list has a Spanish certification.

<table>
<thead>
<tr>
<th></th>
<th>Vendor</th>
<th>2020</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Telephonic Interpretations</strong></td>
<td>Voiance</td>
<td>981</td>
<td>$7,515.63</td>
</tr>
<tr>
<td><strong>Written Translations</strong></td>
<td>Voiance</td>
<td>0</td>
<td>$0.00</td>
</tr>
<tr>
<td><strong>Bilingual Skills Testing</strong></td>
<td>Language Line</td>
<td>1</td>
<td>$250.00</td>
</tr>
</tbody>
</table>

Due to the global pandemic, BCS did not accept as many calls in 2020. The borough offices and call center was closed for a couple of weeks.

Bilingual testing was not completed because there were no new hires during the year as well.

The bureau spent approximately $7,500 on Voiance Interpretation service in 2020.

The agency spent $32,000 on translation services (Geneva, Erikson) in 2020.

**VI. Provision of language access services**

BCS

Voiance- (Telephonic Interpretation Service)

Language Line- (Language Certification)

The Clerical Associate list has a Spanish certification. The bureau has asked the agency to call the Spanish certification list in order to employ people who are able to translate calls. Those employees are then tested and certified through Language Line in their specified language.
The bureau provides annual training for frontline staff and managers on the agency’s language access obligations and policies and procedures to provide interpretation, translation, and language access.

The bureau has a training unit that keeps track of all front-line employee annual trainings, including those that have been trained and those that need to be trained.

The bureau currently has a stable outreach workforce, and is considering providing a refresher course for them.

- **Translation services**

  **Agency-wide**

  The agency determined which of its documents were most widely distributed after reviewing the documents generated by each of its bureaus. The agency had translated the majority of these documents into the ten designated languages; however, a number of those documents received additional edits from the Mayor’s Office of Customer Service.

  Each document is reviewed as it comes up for reprinting, updating, and/or revision. Everything that the bureaus develop would be posted online and is reviewed by the agency language access coordinators who speak to the bureaus to see what they need to translate, regardless of how widely or narrowly distributed it is. It has to do with the need by the audience and not the volume.

  Translation of documents is project managed by the Special Projects and Initiatives Coordinator.

  The agency uses its professional translation service – Geneva – to translate all its documents, and uses an additional language translation service – Eriksen – for secondary reviews to ensure quality control.

  Translated materials are primarily available digitally.

  Staff are aware of agency translation services through their bureau language access coordinators.

- **Interpretation services**

  To enable the LEP population to speak and to interact with all DEP inspectors and public facing employees, regardless of the language they speak, the agency has provided public facing staff with the ability to access a telephone interpretation service that covers nearly 300 languages (and in the case of inspectors and emergency responders with mobile phones in order to do so). This will enable almost everyone in the agency to have a three-way conversation in nearly 300 languages.
The vendor for both BCS and agency-wide is Voiance language services. BCS continues to utilize its Voiance Language contract for telephonic interpretation.

The BCS call center also recruits employees with multiple language skills to assist with Spanish and Chinese customers, which are the two most requested languages encountered by the bureau.

The Clerical Associate list has a Spanish certification. The bureau has asked the agency to call the Spanish certification list in order to employ people who are able to translate calls. Those employees are then tested and certified through Language Line in their specified language.

DEP’s Call Center, Collections Unit, and Borough Offices are equipped with dual headsets to facilitate telephonic interpretations for LEP customers.

The Bureau of Public Affairs and Communications has an additional contract with Voiance for telephonic interpretation that is available for use by the bureaus within the balance of the agency, and instructions on how to utilize the service has been made available to every employee on the agency’s SharePoint site, and that can also be accessed on their mobile phones by inspectors and other emergency responders.

It is Agency Policy to provide telephone translations for all those who request it.

**Language access in agency communications**

Working with MOIA, DEP elevated Language Access to a more accessible spot on the DEP website, which is now found below the “Pay My Bills” section on the homepage:

https://www1.nyc.gov/site/dep/index.page

Working with the Special Projects and Initiatives Unit, language was developed, translated, and published to the website, and a Language Access navigation item was created within Publications: https://www1.nyc.gov/site/dep/about/language-access.page

We believe this should fulfill both our LL30 requirements, and MOIA’s request to elevate Language Access on the DEP website.

- **Plain language**

Working with DEP’s Office of Business information Technology (BIT), BPAC developed a SharePoint site for a plain language review of all documents being requested by the bureaus for original documents, reprints, updates, etc. before they are sent for design and printing. This information is disseminated to the bureaus by the bureau language access coordinators. DEP has also had training provided for a number of employees in the bureaus, and has a Director of Customer Engagement, who is working closely with the Agency Language Access Coordinators and the Chiefs of Staff of the various bureaus that interact with customers to ensure that they consider all customer related information is written in plain language, and translated appropriately for the LEP population.
• Policies and Procedures

DEP has provided information available to all employees on how to access interpretation services, and plain language of documents on the agency’s SharePoint site. In addition, they can speak with their bureau LACs.

• Notification of free interpretation signage

In all of the BCS borough offices, a greeter is stationed at the entrance and will inform customers of the translation service once requested. The bureau also utilizes language cards developed by the Mayor’s Office of Operations and Immigrant Affairs that customers can use to point to the language that they speak. In addition, they use the City’s “I Speak” cards for Interpreting Services template for identifying the language the LEP customer speaks to let the greeter know that an interpreter is needed.

• Languages beyond the top 10

Each document is reviewed as it comes up for reprinting, updating, and/or revision. The agency language access coordinators speak to the bureaus to see what they need to translate, regardless of how widely or narrowly distributed it is. It has to do with the need by the audience and not the volume.

DEP has translated a number of documents into more than the top ten languages, including Yiddish and Italian. The agency has also translated documents for specific constituencies, such as the ‘Dry Cleaners Guide’ in Korean.

• emergency preparedness and response.

In an emergency we work with the New York City Emergency Management Office (NYCEM) and they are lead. If need be, we would work with Voiance for language interpretation, and our other vendors for translations.

DEP’s current translation service for the Bureau of Water Supply is able to provide translations related to Boil Water alerts within the federally mandated guidelines for notifications, and templates for Boil Water notices have been translated into the ten designated languages.

The plan addresses how the agency makes licenses, permits and registrations (LPRs) accessible, if applicable.

The agency has a limited number of licenses, permits, and registrations related to the public, and which were determined between the agency and the Mayor’s Office of Immigrant Affairs (MOIA).

 o The agency provides instructions in 10 languages on how to apply for licenses/permits/registrations it issues and has them posted online.
 o Applicants can call a phone line where staff can use telephonic interpretation in order to apply or submit necessary information, which is advertised in 10 languages on the agency website.
 o Applicants can receive language assistance while filling out an application by coming to a walk-in location, which is advertised in 10 languages on the agency website
The agency has multilingual navigation in 10 languages that directs users with limited English proficiency to application information in their language.

Inspections can be conducted in any number of languages using the agency’s vendor Voiance. Inspectors are supplied with agency issued mobile phones and instructions for accessing Voiance are supplied to staff.

VII  Training

BCS Training for language services includes:

- Legal obligations and agency policy on language access (including Local Law 30)
- When and how to use telephonic interpretation
- When and how to use in-person interpretation
- When and how to request translation services
- How to identify the primary language of a person with LEP
- How to provide customer service to individuals with LEP

Training is provided by a professional training staff, who track the frontline staff for refresher training. The bureau is also looking at providing outreach staff with refresher training as well.

VIII  Record keeping and evaluation

BCS tracks the language spoken by customers/clients seeking services. BCS tracks invoices for interpretive services, and monitors and records the information on customer files.

DEP has a Director of Customer Engagement, who is working closely with the Agency Language Access Coordinators and the Chiefs of Staff of the various bureaus that interact with customers to ensure that they consider all customer related information is written in plain language, and translated appropriately for the LEP population.

A bureau liaison at each BCS borough office sends the Manager of the borough office quarterly reports on the number of LEP requests encountered at each office. These reports are reviewed to assess the effectiveness of the Language Access Plan in each of the five borough offices and to evaluate the LEP customer assistance.

The call center maintains a log for all LEP calls requiring the assistance of a bilingual customer service representative or interpretation service participation. The log is used to measure current utilization and to assess future staffing requirements. Information is captured daily, submitted weekly for in-house compiling and internal reporting, and reported monthly in the bureau’s metrics data.

Other bureaus do not meet with the public with the same frequency and volume and are just beginning to keep these kinds of records.

IX.  Resource analysis and planning

The Agency makes language access a priority and there is an open budget for providing interpretation and translations.
DEP has already provided the following resources over the course of the prior three years:

Mobile phones have been provided to DEP Police, inspectors, and other staff that interact with the public outside of DEP’s offices. Language interpretation services were contracted for, and instructions on how to access the service is available on the agency’s SharePoint site.

All DEP widely distributed public facing documents have been translated into the ten designated languages.

DEP has developed an LEP Language landing page on its website to make it user friendly and where a speaker of any of the ten citywide designated languages can find any widely distributed documents translated in their language.
X. Outreach and public awareness of language access services

DEP has informed its Bureaus and Offices of Local Law 30, ordering each City Agency to create a Language Access policy and Implementation Plan that will ensure meaningful access to the services the agency provides.

Information about the DEP Language Access plan appears on our website and is also disseminated through social media channels.

DEP will continue to ensure that all translated documents are posted on its website. This project remains on-going as DEP continues to review and translate documents where necessary. Widely distributed documents will direct the LEP Population to a landing page where they will find a fully translated copy.

All bureau offices and public facing windows have Language Identification signage and all inspectors will carry language identification cards.

XI. Language Access complaints

No language access complaints have been received by the Agency.

In the event of any future language access complaints, a system has been set up to ensure that the language access complaints will be investigated and action taken to ameliorate them. All complaints received will be reviewed by the Commissioner’s Office staff, and then sent to the appropriate bureau recipients as well as the agency language access coordinators to make sure that complaints will be investigated and resolved. In addition, the Commissioner’s Office staff will review every complaint to see if there is any language access component included, and the same procedure will be followed as for the individual language complaints.

BCS has NYC feedback cards at all borough office locations as well as at their outreach events so that residents can give the bureau any type of feedback relating to their service or experience. Complaints may also be submitted through 311 and on the agency’s website, as well as on social media and through correspondence.

XII. Implementation plan logistics

This section addresses the following provisions from LL30:

In order to maximize resources effectively, Language Access services provided by BCS will utilize a hierarchy for service provision. Borough Office and Call Center bi-lingual staff in the languages each operation supports. If an LEP customer speaks a language that is not supported by this level of staff, assistance will be provided through its respective translation and interpretation contracts. This will allow the bureau to maximize the dollars allocated to the contracts.

DEP has contracts in place for both translation and interpretation services that are accessible by every bureau to provide assistance in nearly 300 languages to accommodate any requests from the public for written and interpretive services.
All language service contracts will continue to be in place moving forward as part of the agency’s Language Access Implementation Plan.

<table>
<thead>
<tr>
<th>Future Goals</th>
<th>Milestones</th>
<th>Responsible staff</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Language access goal</strong></td>
<td></td>
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</tr>
<tr>
<td>Continue quarterly LAIP review meetings with bureau liaisons</td>
<td>Every three months</td>
<td>Agency Language Access Coordinators (LAC)</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Continue reviewing new documents for plain language</td>
<td>Follow up with bureau coordinators</td>
<td>Agency LACs Director of Customer Engagement</td>
<td>ongoing</td>
</tr>
<tr>
<td>Continue reviewing new and revised documents to see if they require translation</td>
<td>Within two weeks of document completion</td>
<td>Agency LACs Director of Customer Engagement Bureau Liaisons</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Acquire service for Simultaneous’ translations for agency and community meetings where applicable</td>
<td>Signed contract for services</td>
<td>DEP web group LACs</td>
<td>By end CY 2021</td>
</tr>
<tr>
<td>Acquire access to Zoom Platform as Zoom has a feature that allows for simultaneous interpretation.</td>
<td>Signed contract for services</td>
<td>DEP web group LACs</td>
<td>By end CY 2021</td>
</tr>
<tr>
<td>Continue to develop virtual activities (tours, programming, etc.)</td>
<td>Completion of each activity</td>
<td>LACs Special Projects and Initiatives Team</td>
<td>Ongoing</td>
</tr>
</tbody>
</table>