

Mayor's Office

Language Access Implementation Plan

February 2020

Mayor Bill de Blasio

**Mayor's Office
Language Access Implementation Plan**

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Under the de Blasio Administration, the City of New York strives to be the safest and fairest big city. Communication plays a central role in the effective delivery of government services and community engagement. Local Law 30 and language access are critical to ensuring that all New Yorkers, regardless of the language(s) they speak, have access to the information and services provided by their City.

The Office of the Mayor of New York City, or Mayor's Office, is comprised of a number of distinct offices that address a wide array of public needs. The Mayor's Office Language Access Implementation Plan addresses how Mayoral offices that are covered under Local Law 30 (based on their engagement with the public), address language access.

The Plan was developed by the Mayor's Office of Immigrant Affairs (MOIA), in coordination with all other covered Mayoral offices. MOIA advances language access throughout City government through capacity-building, technical assistance, and guidance to City agencies on language access and the provision of services that support the wellbeing of immigrants. MOIA provides a central coordination role for the City's language access laws, specifically oversight of LL30, in consultation with the Mayor's Office of Operations (Operations).

Each covered office has appointed a Language Access Liaison who will be responsible for overseeing the implementation of the plan for their respective Office, and MOIA will provide oversight and technical assistance to help offices meet the requirements of Local Law 30.

I. Agency mission and background

The Office of the Mayor of New York City, or Mayor's Office, is comprised of a number of offices that address a wide array of public needs. The Mayor's Office Language Access Implementation Plan addresses how Mayoral offices that are covered under Local Law 30 (based on their engagement with the public), address language access. A description of each covered office is below.

Mayor's Office for People with Disabilities (MOPD)

The Mayor's Office for People with Disabilities (MOPD) is the liaison between New York City government and the disability community. In partnership with all City offices and agencies, MOPD ensures that the rights and concerns of the disability community are included in all City initiatives and that City programs and policies address the needs of people with disabilities.

NYC Service

NYC Service builds partnerships to deepen and expand civic engagement through volunteer and service programs, creating sustainable change for our city's greatest needs.

Citywide Event Coordination and Management (CECM)

CECM provides oversight on all event permitting activities; advises and assists the Mayor in the coordination of policies, procedures and operations in relation to permitting; reviews the coordination of street activities and pedestrian plaza events; and works directly with other permitting agencies to ensure active communication with residents, community boards and business improvement districts.

Office of Climate Policy and Programs (CPP)

The Mayor's Office of Climate Policy and Programs leads New York City's fight against climate change and manages OneNYC 2050, New York City's Green New Deal and a long-term strategy to secure our city's future against the challenges of today and tomorrow, with bold actions to confront our climate crisis, achieve equity, and strengthen our democracy.

Environmental Coordination (MOEC)

The Office assists City agencies in carrying out their environmental review responsibilities. In addition to being the repository for all City Environmental Quality Review (CEQR) documents, the Mayor's Office of Environmental Coordination serves as the City's liaison to state and federal agencies on environmental matters and advises the Mayor on matters of environmental policy.

Mayor's Office of Resiliency (MOR)

The Mayor's Office of Resiliency strives to adapt New York City to the unprecedented challenge of climate change, creating a more resilient, equitable and vibrant city for the New Yorkers of today and generations to come. MOR leads the City's efforts to ensure that New York City is ready to withstand and emerge stronger from the multiple impacts of climate change in the near- and long-term.

Office of Sustainability

The Mayor's Office of Sustainability is dedicated to making New York City greener and fairer,

and reaching zero waste and carbon, through policies, programs, and direct outreach and engagement.

Community Affairs Unit (CAU)

The Mayor's Community Affairs Unit is the fundamental connection between City Hall and New York City residents throughout the five boroughs. The primary mission of CAU is to establish deep partnerships with communities in order to actively engage and mobilize New Yorkers in City government.

Mayor's Office of Correspondence

The Mayor's Office of Correspondence is responsible for reading, routing, and responding to all letters, emails, and 311 calls addressed to the Mayor. Correspondence staff also draft mayoral messages, certificates and proclamations for events, in addition to assisting other mayoral offices and agencies with a variety of writing and editing projects.

Mayor's Office of Criminal Justice (MOCJ)

The Mayor's Office of Criminal Justice shapes and funds justice strategies at every stage by facilitating cooperation and partnerships among the agencies and actors involved in crime prevention and criminal justice in New York City. As such, MOCJ serves to ensure the fair and efficient functioning of the Criminal Justice System in the City.

Mayor's Office to Protect Tenants (MOPT)

The Mayor's Office to Protect Tenants (MOPT) coordinates the City's range of tenant protection efforts and plays a key role in the City's strategy to confront the affordable housing crisis. This newly established office will work across City agencies to make existing anti-harassment and anti-displacement programs better, and create new strategies to root out abuse.

Office of Environmental Remediation (OER)

The New York City Mayor's Office of Environmental Remediation is a team of scientists and engineers that design and operate municipal programs to promote cleanup and redevelopment of vacant contaminated land in New York City.

Office of Immigrant Affairs (MOIA)

The mission of the New York City Mayor's Office of Immigrant Affairs is to facilitate the full inclusion of immigrant New Yorkers into the City's civic, economic, and cultural life. Realizing this mission in a city as diverse as New York City requires multiple approaches to advance immigrant inclusion. MOIA seeks to increase access to services for immigrant New Yorkers, as well as inform and engage and advocate on behalf of immigrant New Yorkers.

Office of Special Enforcement (OSE)

The Mayor's Office of Special Enforcement (OSE) is an innovative, solutions-oriented task force that ensures NYC communities are safe from harmful illegal and unregulated industries that one agency and one set of enforcement tools alone can't address.

Office of Special Projects and Community Events (MOSPCE)

In support of the Mayor and First Lady's commitment to honor the diverse communities of our City, the Mayor's Office of Special Projects and Community Events organizes Mayoral events in partnership with city agencies and with the support of the private sector.

Office of Workforce Development

The Mayor's Office of Workforce Development drives an equity agenda for the future of work in New York City by ensuring the City invests in all New Yorkers, by driving high road jobs and employers, and by connecting elements of the system to achieve better outcomes for New Yorkers and employers.

Public Design Commission (PDC)

As New York City's design review agency, the Public Design Commission (PDC) has jurisdiction over permanent structures, landscape architecture, and art proposed on or over City-owned property. The mission of the PDC is to advocate for innovative, sustainable, and equitable design of public spaces and civic structures, with a goal of improving the public realm for all New Yorkers throughout the five boroughs.

Thrive NYC

ThriveNYC works to ensure that every New Yorker has access to mental health support, whenever and wherever they need it. ThriveNYC works in partnership with many City agencies to: Innovate by piloting new evidence-driven strategies to address mental health needs; enhance mental healthcare equity by increasing access to mental health support outside of traditional clinical settings, in locations such as shelters, senior centers, schools and community-based organizations; and promote inclusion by reducing stigma and cultural barriers to care and partner with communities to ensure that vulnerable populations know about and have access to mental health support.

II. Agency language access policy and goals

It is the policy of the Mayor's Office to provide timely, meaningful access for persons with Limited English Proficiency (LEP) to services and information, in accordance with Local Law 30 of 2017.

- All personnel shall provide free language assistance services to individuals with LEP whom they encounter or whenever a person with LEP requests language assistance services.
- All personnel will inform members of the public that language assistance services are available free of charge to persons with LEP and that the agency will provide these services to them.
- Language assistance available to the public under the provisions of Local Law 30 includes: telephonic interpretation, in-person interpretation where appropriate, and translations into ten designated Citywide languages of documents deemed to be most commonly distributed by the covered offices.

III. LEP population assessment

As guided by Local Law 30, the Mayor's Office applies the "four factor analysis" promulgated by the US Department of Justice to assess obligations for language access as the basis for its Language Access Implementation Plan.

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

As noted in Section I, the units of the Mayor's Office have multiple and varied types of engagement with the public across New York City. The eligible service population, accordingly, is the general population of New York City.

The Mayor's Office, led by MOIA, looked at citywide data to assess the number or proportion of LEP persons and their languages in the eligible service population for the services and information provided by covered offices. According to analysis of Census data provided by the Department of City Planning, 49% of New Yorkers above the age of five, or approximately 3.9 million New Yorkers, speak a language other than English at home. Twenty three percent of New Yorkers, or 2 million individuals, are considered limited English proficient (LEP), meaning that they self-identify as speaking English "less than very well." LEP correlates with an increased need for language assistance.

The Mayor's Office applies the analysis undertaken by MOIA under Local Law 30 to determine the top ten citywide languages based on data from the Census and the NYC Department of Education. Based on this analysis, the ten citywide languages for FY18 - FY21 are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish.

Factor 2 – the frequency with which LEP individuals come into contact with the agency

According to the breadth and variety of activities realized by the Mayor's Office, the frequency with which units of the Office come into contact with individuals with LEP varies.

Some units, such as MOPD, MOIA, and CAU, engage directly with individuals with LEP on a regular basis, while other units have much lower frequency of contact. Many offices have

significant contact with populations with LEP, but only a few times a year, in relationship to specific initiatives, campaigns, or events. Others have activities that are open to the general public, and therefore must also be accessible for individuals with LEP.

Factor 3 – the importance of benefit, service, information or encounter to the LEP person

The Mayor's Office serves as a critical link between the City's government and its constituency.

Units across the Mayor's Office provide invaluable information and services to the public in a variety of ways, including, but not limited to:

- constituent services and outreach (MOPD, MOIA, MOSPCE, WKDEV)
- provision of permits (CECM)
- events, town halls, and public meetings (MOIA, CAU, MOCJ, OEC, OER)
- community engagement around sustainable futures for our City (Sustainability, MOR, CPP)

In recognition of the importance of these services to the civic participation of all the communities of our City, the Mayor's Office, through this Language Access Implementation Plan, lays out how it will ensure New Yorkers with Limited English Proficiency have meaningful access to its information and services.

Factor 4 – resources available

MOIA's Language Service Team (LST) provides language services for covered Mayoral offices and contracts with translation, in-person and telephonic interpretation vendors through the DCAS language service contracts and contracts with a third party translation vendor that provides a quality assurance review on translated documents.

MOIA has procured interpretation equipment as well as computer-assisted translation tools, to streamline translation requests, improve consistency, quality, and turnaround times of translated materials.

MOIA has expanded its Language Service Team and budget in anticipation of support for the covered units of the Mayor's Office. The LST will continue to calibrate its budget requests as it continues to provide language services under LL30.

Mayoral offices also employ bilingual staff, who can engage directly with LEP individuals.

Evaluation of language access needs of agency's service population

Based on our assessment of the above factors, a significant number of the Mayor's Office's target service population has LEP.

While speakers of the ten Designated Citywide Languages under Local Law 30 account for more than 85% of foreign-born New York City residents with LEP, MOIA makes additional efforts to engage speakers of languages beyond the ten designated under the law.

In order to ensure that MOIA's Outreach Team can effectively engage with these hard-to-reach communities that it has identified, MOIA provides interpretation in and translates materials

into languages beyond the local law languages. Additionally, MOIA's LST collaborates with other Mayoral Offices to support specific requests. For example, in calendar year 2018, the LST:

- provided over 330 interpreters that spoke 18 languages at 110 Mayor's Office events.
- translated materials into 38 languages in response to directed outreach to specific communities. These languages include Nepali, Tibetan, Greek, Burmese, Tajik, Uzbek, Punjabi, Wolof, Quechua, Kiche, Greek, and Japanese.

As part of the implementation plan, MOIA will continue to work with Mayoral Office units to assess their respective engagement with New Yorkers with Limited English Proficiency.

IV. Provision of language assistance services

The Mayor's Office provides language services to serve, communicate, and engage with its constituents through multiple means. Across the array of resources, the Mayor's Office seeks to improve the coverage, appropriateness, effectiveness, and efficiency of its language services.

Bilingual Staff

The Mayor's Office recognizes that understanding cultural nuances of immigrant communities and being able to communicate with New Yorkers who are limited English proficient without the use of an interpreter are critical. Roughly half of New Yorkers speak a language other than English at home. The language ability of bilingual staff is an important asset, if used appropriately, for communicating with fellow New Yorkers.

As such, several units of the Mayor's Office employ bilingual staff. MOIA in particular seeks to hire bilingual staff for any position that will directly engage with LEP individuals. Its Outreach Team, for example, collectively speaks roughly six to eight languages and MOIA's Constituent Services Team has bilingual staff and fellows. Additionally, agencies such as CECM, CPP, OEP, OEC, CAU, and Special Enforcement Offices currently employ bilingual staff members who, where appropriate, communicate directly with individuals with LEP.

Professional Language Services

While multilingual staff are an asset to reaching New Yorkers with LEP, the Mayor's Office does not rely on them to translate materials or interpret. To ensure effective communication, the Mayor's Office uses the services of contracted translation and interpretation vendors. Bilingual staff may be used to communicate directly with New Yorkers with LEP in their primary language, as opposed to acting as an interpreter for another staff member who is rendering services to a client.

In December 2016, MOIA established the Language Services Team (LST) to centralize the coordination of language services within MOIA and select Mayoral Offices. MOIA's LST provides services for Mayoral Offices that need these services by:

- Overseeing the delivery of translation and interpretation services
- Providing a point of contact for staff, external vendors and other partners
- Managing procurement and accounting of contracted language services
- Distributing and maintaining an inventory of interpretation equipment
- Providing training to Mayor's Office staff
- Identifying new needs and language services solutions

This centralization streamlines the processing of requests and turnaround times, and leverages the language access technical expertise of staff, which improves the quality of the multilingual content that the Mayor's Office delivers. The LST stays up to date with developments and trends in the language services industry. In spring 2018, the LST launched an online portal for translation and interpretation requests from MOIA and Mayoral Offices to structure communications and project management.

Below, we describe our approach to providing translated documents and interpretation services.

Translation

The Mayor's Office aims to ensure that critical written material is available and disseminated in the languages needed by its target audiences. The LST works with a translation vendor through the DCAS Citywide Language Services contracts to translate these materials.

"Most-commonly-distributed" documents

During FY20, units of the Mayor's Office will identify their most commonly distributed documents. Liaisons will submit them to the LST for translation into the top 10 LL30 languages.

Plain language

The LST language access training addresses how to develop content and design materials for a multilingual audience. During FY20, units of the Mayor's Office will review their most commonly distributed documents and which will be translated into the ten languages designated under LL30. Units will integrate plain language review into the workflow for all new document creation, to ensure that ease of translation and accessibility in English. MOIA and Operations will provide technical assistance around plain language practices.

Quality Assurance/Quality Improvement

The LST incorporates standard practices and tools from the language service industry to expand delivery of translated materials that are high quality and produced in a timely fashion.

To ensure quality, the LST's practices incorporate:

- Standardized project and file management for translation projects, including version control.
- Consistent and proactive communications with vendors and clients (colleagues at MOIA and other Mayoral Offices).
- Advising clients, including sister agencies, on content issues that may affect the translation process.
- Conducting training for staff of covered Mayoral Offices.
- Liaising with vendors and DCAS to ensure we receive high quality services.
- Standardizing the tools used to produce materials (e.g., Adobe Creative Cloud).
- Expanding the use of a glossary (or termbase) and style sheets.

In 2018, the LST introduced computer-assisted translation (CAT) tools from the language services industry to manage an increasing body of multilingual content. These tools help improve the quality and consistency of translated materials as well as turnaround times.

While the contracted vendor has a quality assurance process, MOIA provides supplemental quality assurance through a contract with a secondary translation vendor that reviews certain translated materials. MOIA's bilingual staff or the Citywide Volunteer Language Bank may also provide quality assurance reviews of materials.

The LST developed a language service protocol and distributes a one-page guide for staff on how to request translation and interpretation services and how to use telephonic interpretation. The LST reviews its provision of language services to identify opportunities for improvement through refined practice (coordination and collaboration) and more appropriate inputs (vendors, tools/technology).

Written communications beyond the "most commonly distributed" documents

The Mayor's Office will assess what additional communications covered units have with LEP individuals and how to make those accessible, so as to continue to expand coverage over time.

Interpretation

When it is not appropriate to use bilingual staff, the Mayor's Office will use professional interpretation services (either in-person or over the phone) in its outreach, to respond to constituent inquiries, and at points of service, as needed. MOIA procured these interpretation vendors through the DCAS Citywide Language Service contracts. The LST assesses feedback about the quality of services and relays any concerns back to the vendors, and/or engages with DCAS, as necessary.

In-Person Interpretation

MOIA provides interpretation at events and gatherings, including Mayoral Town Halls and other public-facing events held by Mayoral Offices. For these events, MOIA uses its contracted vendors to provide consecutive or simultaneous interpretation in languages of the target audience. MOIA has purchased and maintains interpretation equipment, including both stationary and portable transmitters, receivers, headphones, and booths, to allow for simultaneous interpretation. The LST provides this equipment and coordinates interpreters for events organized by MOIA staff and covered Mayoral Offices.

Telephonic Interpretation

Telephonic interpretation provides a valuable and flexible service to support exchanges in languages not spoken by bilingual staff – for phone calls and to support in-person encounters in the office or in the field. Telephonic interpretation provides ready access in more than 200 languages. All Mayoral Office staff can access telephonic interpretation service through the DCAS contract with Language Line, coordinated by MOIA.

Notification of Free Interpretation Services

The Mayor's Office informs members of the public about the availability of free interpretation services in multiple ways, including through multilingual signage and outreach presentations. MOIA developed wall posters, tabletop signs, and wallet-sized "I Speak" cards to support awareness about the availability of free interpretation. City agencies and Mayor's Offices can access these tools through the Immigrant Resources Portal on Cityshare, the citywide intranet. MOIA has promoted these tools to covered units in the Mayor's Office.

MOIA also provides signage and makes announcements at events where there is interpretation to ensure individuals with LEP are aware of the service. MOIA's multilingual "Know Your Rights" presentations also promote awareness about Local Law 30 and New Yorkers' rights to language services across City government (see Section VIII).

Emergency Planning

In partnership with NYC Emergency Management (NYCEM) and the Department of Social Services (DSS), MOIA coordinates language access in certain emergencies. When the emergency is of a certain scale, NYCEM triggers the "Language Access Lead Team," comprised of NYCEM, DSS, MOIA and other key agencies to assess language access needs, determine provision of

language services, and identify whether additional resources need are needed. Covered units are responsible for ensuring materials they use in emergencies are translated.

V. Training

To ensure that Mayor's Office staff are aware about language access obligations and services available to support their efforts, the LST provides annual training for MOIA staff and MO Language Access Liaisons. The training addresses the following:

- The importance of language access in ensuring equity and its importance to the mission of the Mayor's Office;
- The City's legal obligations around language access, including Local Law 30;
- The language services resources available to MO staff to ensure they can communicate with LEP New Yorkers and how to access those services; and
- Steps staff can take to ensure the quality of multilingual communications, including standards for ensuring that documents are written in plain language.

The LST also provides additional refresher trainings on language services and the use of interpretation equipment for Language Access Liaisons and/or staff developing materials or conducting outreach.

The LST distributes its one-page guide on how to request translation and interpretation services and how to use telephonic interpretation to staff. The LST reviews and updates training and instructional materials at least annually to further integrate multilingual communications across operations.

Language Access Liaisons are responsible to for distributing the guide to language services to all new staff and providing periodic reminders to staff about what is available to them and their respective Office's responsibility to provide services.

VI. Record keeping and evaluation

The LST processes and tracks the translation of materials, as well as requests and fulfillment of interpretation services at covered Mayoral Offices. The LST regularly assesses the volume of service requests and how they were provided.

In alignment with the procurement and fiscal cycles, the LST reviews its delivery of language services with members of MOIA's Senior Team to identify new needs and opportunities for improvement. This review includes an assessment of demand for language services, the LST's ability to meet demand and manage projects effectively, and any issues encountered with respect to contracted services.

VII. Resource analysis and planning

In addition to periodic review by the LST to improve its delivery of language services and identify gaps in provision (see Section IV), MOIA seeks to better understand shifts in language needs across immigrant communities and to ensure that communications and communications resources are being used effectively.

MOIA relies on outreach by MOIA staff to immigrant communities (see Section VIII below), conducts demographic research, and monitors data releases from the Population Division of the Department of City Planning and other sources of demographic information. MOIA's broader research and evaluation will be used to guide its provision of services and technical assistance to Mayoral Offices.

MOIA maintains relationships with immigrant-serving community organizations that share the priority needs and challenges faced by their respective communities, including language barriers to accessing services. This information guides MOIA's practices around staffing, developing multilingual information and resources for these communities, and working with contracted vendors. MOIA also supports immigrant communities by sharing relevant information with and from City agencies and Mayoral Offices. MOIA looks to expand and deepen its collaboration with organizations serving newer or underserved communities and organizes multilingual community forums to engage residents.

VIII. Outreach and public awareness of language access services

There are various ways Mayoral Offices can promote awareness of languages services. As noted in Section IV, MOIA has provided tools, such as signage, "I speak" cards, and "Point to Your Language" one pagers that inform New Yorkers about interpretation services. Offices will also provide notification on their websites regarding the availability of free interpretation and translated materials, add notification on relevant flyers and include this information in outreach presentations, as appropriate. Sections IV and VII describe additional ways MOIA raises awareness to communities about language services, including through its Know Your Rights presentations and engagement with immigrant-serving community organizations.

IX. Language Access complaints

All covered Offices will appoint a liaison who will receive, troubleshoot, and track language access complaints received via 311. Liaisons will provide a response to the complainant within 14 days as per the Citywide Customer Service Standard. Liaisons will contact appropriate staff member to investigate the complaint, respond to the constituent, and if necessary, re-issue any relevant guidance regarding language access. MOIA is copied on complaints, which it tracks to ensure offices have followed up.

X. Implementation plan logistics

Implementation Goals & Timeline		
Providing Language Services	- MOIA provides training to liaisons of covered mayoral offices regarding LL30, language services available to them and how to request services	CY19 Q3
	- MOIA distributes telephonic interpretation codes to offices	CY19 Q3
	- Offices identify commonly distributed docs	CY20 Q1
	- Offices will integrate plain language principles into material creation	CY20 Q1
	- Begin translation	CY20 Q1-CY20 Q2
Training	- MOIA trains mayoral office liaisons	CY19 Q3
	- Liaisons disseminate info to staff	CY 19 Q3- CY 20 Q1
Awareness of free language services	- MOIA provides tools (signs, "I speak" cards, etc.)	CY19 Q3
	- Offices post signage (if applicable)	CY20 Q1
	- Offices disseminate other tools to staff	CY20 Q1
	- Offices add text to outreach/hearing flyers and presentations re availability of free interpretation	CY20 Q1-CY20 Q3
	- Offices provide multilingual note on respective websites about free language services	CY20 Q1
311 Complaint Procedures	- Offices designate a person to receive 311 complaints	CY20 Q1
	- Offices determine process for responding to 311 language access complaints	CY20 Q1