



Language Access Plan

I. Agency Mission and Background

The 311 Customer Service Center became operational in March 2003. The mission of 311 is to provide the public with quick, easy access to all New York City government services and information while maintaining the highest possible level of customer service. The 311 Customer Service Center is the primary vehicle used by residents, businesses and visitors to New York City, to obtain non-emergency government services and information throughout the 5 boroughs. By dialing one easy to remember telephone number, a caller can obtain information for over 4,000 services. Calls to 311 are answered 24 hours a day, 7 days per week, and 365 days a year. Call taking services include providing information, processing service requests for various City agencies and taking complaints from callers with respect to City services, as well as, referrals to certain City, State and Federal government agencies.

City agencies for which 311 takes service requests include, but are not limited to: Department of Buildings; Department of Sanitation; Department of Housing, Preservation and Development; Department of Environmental Protection; Department of Transportation; Department of Parks and Recreation; Department of Education; Police Department (Quality of Life); Department of Health and Mental Hygiene; Taxi and Limousine Commission.

311 assists agencies to improve service delivery by allowing them to focus on their core missions and manage their workload efficiently.

We also provide insight into ways to improve City government through accurate, consistent measurement and analysis of service delivery Citywide.

II. Agency Language Access Policy and Goals

311 has been providing telephonic interpretation services and translation services as required in over 175 languages prior to Executive Order 120 in 2008 and Local Law 30 in 2017. All services provided by the 311 Customer Service Center are available to LEP individuals that contact 311, regardless of language spoken. 311 is committed to working with elected officials and members of the public, to improve service delivery to individuals with limited English proficiency.

In 2013 the Department of Citywide Administration (DCAS) contracted with Language Line Solutions and Geneva Worldwide for over the phone interpretation and language translation services. 311 currently uses both vendors for the respective services listed above. The DCAS master contract is designed to permit all City agencies to establish a



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Task Order under the umbrella of the contract. Not only does this alleviate other agencies from having to undergo the arduous and costly Request for Proposal (RFP) process, other agencies will benefit by economies of scale offered by the contract.

311 is committed to improving the customer experience for all citizens that contact the call center. As such, we inform our customers of the availability of interpretation services via our IVR messaging and the connect times to an interpreter are tied to service level agreements in our contracts with our service providers. Providing non English callers with the option to speak in their native language or a language they are most comfortable speaking, encourages them to contact 311 for assistance with obtaining government services or information. Reducing wait time for our customers to connect to an interpreter improves their overall experience and is a goal for 311.

III. LEP Population Assessment

Factor 1- Demographic Analysis

The City of New York has a diverse population of over 8.5 million people. Executive Order 120 and Local Law 30 requires agencies providing direct public and emergency public services to provide services in 10 languages. These languages were identified by the Mayor's Office of Immigrant Affairs based on an assessment of the US Census data from the Department of Education. The languages are Spanish, Russian, Chinese (Mandarin and Cantonese), Bengali, Haitian Creole, Korean, Arabic, French, Urdu, Polish. 311 has been providing telephonic and translation services since 2003 as required, in over 175 languages, including these languages. Monitoring of the frequency of use of these languages is performed routinely.

Factor 2 – LEP data tailored specifically to 311

311 obtains information from other agencies that assist us in determining peak language requirements in specific languages for targeted outreach programs. Over 94% of limited English proficient callers to 311 request interpretation services in Spanish, Mandarin, Russian and Cantonese. The remaining 6% are in other languages. All limited English proficient individuals, regardless of language, are eligible for interpretation services. Providing non English callers with the option to speak in their native language or a language they are most comfortable speaking, encourages them to contact 311 for assistance with obtaining government services or information. During a call with a limited English speaking individual where interpretation services are engaged and it is determined that the call is an emergency that requires a transfer to 911, the 311 agent will immediately conference the caller along with the interpreter to 911 and remain on the call until the 911 operator authorizes 311 to disengage. During calendar year 2017, 311 received 20,141,764 calls, 639,521 calls required interpretation services. Language line provided assistance on 193,295 of those calls in 93 different



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languages. Compared to calendar year 2007, Language Line has seen an increase of over 116,000 calls.

In addition to contracting with language services vendors for over the phone interpretation and written and recorded translation services, 311 employs customer service representatives who are able to converse with the callers in Spanish.

Language Line Solutions call volumes by Language are reviewed monthly by 311 and quarterly by MOIA to assess changes in the LEP population.

Factor 3 – Nature and Importance of Services

311 provides callers with access to interpreters in the languages they request. Many callers require interpretation services to assist them in obtaining access to information that is provided by various agencies which include The Dept. of Health, Housing Preservation Department, Department of Transportation, Human Resources Administration, etc. Without access to an interpreter, individuals may not obtain the information they are seeking to make informed decisions regarding the eligibility for services offered by many City agencies.

Factor 4 – Resources available for Language Assistance

The 311 Customer Service Center provides various means for members of the public to obtain access to City services. Messages in languages other than English have been included in our upfront IVR messaging solution for all callers.

311 provides translation in over 100 languages on it's website, 311 online, via nyc.gov

311 utilizes the skills of its bilingual (Spanish) staff to support callers requiring telephonic interpretation services.

311 informs the public of language assistance services on its social media and text messaging channels and also provides assistance in languages on these channels.

Translation of cultural signs are displayed in various languages to emphasize to our staff, Agency colleagues, and our visitors our ability to communicate with the public in multiple languages.

311 utilizes a telephonic language interpretation and a translation services vendor with annual costs in excess of \$1,000,000 to provide these services.



IV. Implementation: Plan Logistics

Document Translation Services:

The 311 Customer Service Center does not routinely require document translation services to fulfill its mission of providing information to the public. However, we have contracted with Geneva Worldwide to provide these services in any language when required. All translation requirements (voice recordings or document translations) are determined on a case by case basis. There are no essential documents that require translation at the 311 Customer Service Center. 311 does not routinely distribute documents to the public or the media, nor do we routinely place documents on the Language Gateway. Translation of cultural signs and photographs are displayed in the 311 Customer Service Center in various languages to emphasize to our staff, or Agency colleagues and our visitors (local and international invited delegations) our ability to communicate with the public in multiple languages. Geneva Worldwide is expected to adhere to the service level agreement for document translations and be accessible for rush translation requests in the event of an emergency.

Telephonic Interpretation Services:

It is the business model of 311 to provide interpretation services for all callers 24x7x365 daily since calendar year 2003. This service is currently available in over 200 languages (including the 10 languages covered by Local Law 30), via our telephonic interpretation vendor, Language Line and 311 employees. This represents an increase of 25 additional languages and dialects since 2003. 311 embarked on a plain language initiative in 2011. All content in our CRM system used by our call takers is now listed in plain language for ease of understanding for our customers.

Service level requirements are in place for our vendor that provides telephonic interpretation. It is the goal of 311 to ensure that the average time to have a telephonic interpreter in the four most commonly requested languages (Spanish, Cantonese, Mandarin, and Russian) is 30 seconds or less. 311 is mandated to answer 80% of all calls in 30 seconds. 311 also provide access to health and human services via its 211 dialing protocol in over 200 languages.

311 has a contingency plan that includes redundancy provided by an outsourced vendor. This provides for continuity of call taking services in the event of an emergency that includes uninterrupted language accessibility. 311 maintains its ability to continue operations despite natural disaster or other emergencies as part of its COOP (Continuity of Operations Plan).

A multi-lingual Interactive Voice Response System (IVR) interface was introduced in April 2008 and is currently being upgraded to enhance non English functionality. This



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service provides callers who speak Spanish, Mandarin, Russian, Cantonese, Korean and Haitian Creole the option of listening to current 311 pre-recorded announcements such as “alternate side of the street parking” information in their native language. This is convenient to callers seeking this information and eliminates the need for an agent and or an interpreter. Callers do have the option of requesting assistance after listening to the recording in any of the other languages including the languages recently included by Local Law 30.

The 311 Customer Service Center completed 639,521 telephonic interpretation calls in calendar year 2017 which were comprised of 93 languages.

The center maintains an online channel (311 Online) via nyc.gov which includes the ability to translate all 311Online content offered in over 100 languages.

311 implemented a Text Messaging Channel for citizens to reach 311 at (311692) with plans to communicate in numerous languages, other than the current English and Spanish, in the future.

311 communicated in language other than English (Spanish) in our primary social media channel on a regular basis (Dominican Day Parade or Puerto Rican Day Parade, and provides topical information. Social media channels include Twitter and Facebook.

The 311 Customer Service Center has a Language Access Coordinator. The role of the coordinator includes the following:

- Coordinate over the phone interpretation and document translation services via approved vendors 311 has contracted and proactively manage the contractual relationship for interpretation and translation services.
- Coordinate effective and timely interpretation and translation service for service requests, complaints, and correspondence requiring translation.
- Document and report translation service requested and provided.
- Oversee the operational relationship with each interpretation and translation vendor.
- Collaborate with DCAS, and the DoITT Citywide contracts team related to the contract.
- Monitor service level agreements for each vendor.
- Manage all document translation requests.
- Support the training, quality assurance and operations teams at 311 for interpreter and translator related items.
- Routinely monitor calls for quality assurance purposes.
- Refers problems with service through the vendor’s Voice of the Customer Process (VOC)



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- Interact with DoITT Telephony and IT personnel regarding technical problems encountered with Language Line Solutions and escalate to the vendor, if required, for resolution.

The Language Access coordinator will continue to monitor, maintain, and enhance, whenever possible, access to language services. 311 is fully prepared to provide telephonic interpretation and translation services during day to day operations, as well as, during emergencies.

V. Training

All frontline 311 staff are trained on providing language services as new hires.

Call Center Representatives receive 4 weeks of classroom training with an intense emphasis on customer service skills and techniques.

As part of the training, 311 Call Center Representatives (CCR's) are trained on how to interface with a caller who does not speak English, or whose communication skills are limited in English.

Call Center Representatives are instructed on how to handle a call when they are unable to readily identify the caller's language.

CCR's who are unable to determine the language required by a caller will connect with Language Line and request to speak with someone who is skilled in language identification.

CCR's utilize CTI (Computer Telephony Integration) which allows them to almost instantly connect to Language Line Solutions and conference an interpreter to the call.

CCR's are trained to speak to the caller through the interpreter so that the caller receives the same service as an English speaking caller would receive.

During new hire training 311 trainers review the prescribed tips for handling Language Line calls.

Internal bilingual Spanish staff at King Teleservices (a virtual offsite contact center utilized to support call volumes) must pass a language assessment test approved by the City to be qualified to handle Spanish 311 calls.

Our vendors employ professional interpreters with years of experience and highly qualified testers to administer an Interpreter Skills Assessment Test. Additionally, interpreters are assessed on their ability to speak clearly, remain neutral, maintain



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accuracy in both languages, process information quickly and concisely, be sensitive to cultural differences, be professional and courteous, use appropriate industry terminology, and understand industry practices and procedures. Newly hired interpreters receive a three (3) week orientation program and on-going training and coaching.

311 is an equal opportunity employer that is committed to federal, state and City EEO laws as well as the Citywide EEO policies and procedures.

During new hire training, as part of the customer service component, 311Call Center Representatives are trained to be sensitive to the caller's needs and how to professionally interact with someone who is Limited English Proficient.

311 personnel also received an EEO orientation class which addresses cultural diversity in the workplace when communicating with external customers.

Posters written in other languages are positioned throughout the 311 Contact Center to remind personnel about our sensitivity to the diverse population of callers to 311.

311 quality assurance staff monitors the calls to ensure that quality interpretation services are provided as per Executive Order 120, Local Law 30, and 311 policies daily. Customers contacting 311 are always advised of the availability of language assistance services.

VI. Provision of Language Access Services

All calls to 311 are recorded and all metrics related to language assistance services are readily accessible internally at 311 or via the vendor's portal.

The 311 Quality Assurance Team monitors recorded calls daily for all shifts. Bilingual quality assurance evaluators listen to Spanish calls and provide coaching and development to CCRs. 311 supervisory staff also evaluate and coach Spanish calls. In addition to Spanish, the Quality Assurance Team also evaluates calls handled in other languages to ensure that the English speaking 311 call taker and the interpreter are in synch with providing the caller with quality service.

Language Line Solutions similarly has a Quality Assurance Team that monitors live calls without the knowledge of the interpreter. A senior language specialist provides coaching and feedback and identifies training and developmental needs.

Language Line Solutions has a formalized process known as the Voice of the Customer (VOC) which ensures that coaching feedback is provided in a timely manner regarding concerns expressed by the client and of any action taken. The vendor uses the VOC



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process to target the key areas that may require a developmental program for interpreters. 311 managers or supervisors may refer problematic Language Line calls to the 311 language liaison for review and escalation to the vendor.

Language Line provides monthly and quarterly reports via their portal which include the number of calls and duration of the calls at a granular level (individual calls) and for all calls combined. 311 also maintain metrics on the volume of calls handled by our bilingual employees.

a. Ensuring Compliance with Executive Order 120 and Local Law 30:

311 provides language access in over 200 languages and dialects. The following items ensure compliance with EO 120 and Local Law 30:

311 monitors call volume and consumer needs daily and monthly.

All calls, including those utilizing an interpreter are recorded and retained in accordance with 311's Privacy Policy.

The Quality Assurance team evaluates calls handled in other languages to measure the level of customer service.

Language Line Solutions call volumes by language are reviewed monthly by 311 and quarterly by MOIA to assess changes in the LEP population.

311 conducts routine reviews to determine the need to hire additional bilingual interpreters for other languages besides Spanish.

311 utilizes the vendor's Voice of the Customer process to assess the performance of the vendor's interpreters.

All vendors engaged to provide Language services have contractually agreed upon service level agreements to adhere to when providing the services.

Obtaining feedback from Community Boards, Borough President's Offices and the Mayor's Office of Immigrant Affairs.

Responding to feedback from callers which may result in process improvements or complaints filed as a result of language access problems.

Updating the Language Access Plan as required by the City.



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VII. Resource Analysis and Planning

DCAS hosts the Master Agreement with all Language Service providers. Our current vendor for interpretation services, Language Line Solutions is considered an expert in the industry. Geneva Worldwide provides translation services as required and was selected by the City to do so via a competitive process.

311 and the virtual contact center (King TeleServices) continue to hire personnel who are bilingual in Spanish to ensure language accessibility in our most requested language.

The continued use of the Volunteer Language Bank to utilize City employees who are bilingual in any language for the purpose of proofreading documents which have been translated by the vendors is beneficial to the City. It has been discovered that New York City personnel are sometimes able to make alternate recommendations for translation, utilizing colloquialisms in the foreign language that might be more widely understood by the population of callers to 311. Internal staff is also used to evaluate IVR recordings that are produced by the vendor using professional voice talents.

As the funding permits, the goal is to have all bilingual employees and volunteers certified through the Language Line Proficiency Testing processes.

VIII. Outreach and Public Awareness

The 311 Customer Service Center informs the public of language assistance services on its IVR platform, 311 Online on the web, Social Media and Text messaging channels. Translation of cultural signs and photographs are displayed in the 311 Customer Service Center in various languages to emphasize to our staff, our Agency colleagues, and our visitors (local and international invited delegations) our ability to communicate with the public in multiple languages. 311 does not customarily distribute written materials to members of the public.

IX. Language Access Complaints

The 311 Customer Service Center forwards all language access complaints and requests pertaining to 311 to the Mayor's Office of Immigrant Affairs Language Access Complaint mailbox and to the 311 Language Access Coordinator. All complaints and requests from customers will be tracked via our CRM (Customer Relationship Management) system and monitored by the 311 Language Access Coordinator. It is the responsibility of the 311 Language Access Coordinator to see to the timely resolution of any complaints or requests from customers regarding 311 specifically. 311 reports the amount of complaints received in its Language Access Plan annually and will also report the number of "requests for language access" in that plan document.



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X. Implementation Logistics

The Language Access Liaison for the 311 Customer Service Center is Michael Hutchinson, whose title is Contracts and Finance Director. 311 is language accessible in over 200 languages and has been language accessible since early 2003. 311 does not issue licenses or permits to its customers and unlike some agencies, does not have walk in centers for the public. 311 currently meets all requirements of Executive Order 120 and Local Law 30 and continues to maintain a plain language standard which has been implemented for several years. 311 will continue to review its policies to ensure we maintain compliance to the laws.