

Mayor's Office for People with Disabilities
Language Access Implementation Plan 2018

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Introduction

This Language Access Plan for the Mayor's Office for People with Disabilities (MOPD) has been prepared in accordance with Local Law 30 of 2017 and outlines MOPD's current and planned actions to improve access to programs and services by limited-English proficient (LEP) individuals. The plan is being developed by MOPD along with the Mayor's Office of Operations and Mayor's Office of Immigrant Affairs to ensure information is provided in Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, French, Urdu, and Polish.

Name and title of Language Access Coordinator: Christian Valle, Disability and Access and Functional Needs (DAFN) Accessible Communication Coordinator

1. Agency Mission and Background

Operating since 1973, 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 consistently 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. Through its work and advocacy, MOPD has steadily improved services and programs for the over 920,000 New Yorkers who self-identify as people who are living with a disability as well as the approximately six million annual visitors to the city who have disabilities in all facets of life including transportation, employment, healthcare, housing, education, access to City services, and financial empowerment. Working to make New York the most accessible city in the world, the office regularly engages in advocacy and policymaking at the local, state, national, and international levels to make certain that accessibility and full inclusion are key priorities for all public and private stakeholders alike.

2. Agency Language Access Policy and Goals

MOPD's language access goal is to provide meaningful access for our LEP community members to MOPD's services, information, and materials.

We will continue to provide callers and visitors access to staff members who speak languages other than English many of which are the 10 languages identified in Local Law 30, including Spanish, Arabic, Urdu, Russian, and Bengali. In addition, we also have staff members who are fluent in American Sign Language which is a method of communication used by many of MOPD's constituents who are Deaf. These initial contacts are used to provide and obtain basic information such as the person's name, the general issue they wish to discuss, and a time that works for the appropriate staff person and the constituent so we can obtain interpretation services through the Citywide contract administered by DCAS. Often, this simple exchange reveals that the individual should be speaking with personnel in a different agency. If this is the case, the MOPD staff member contacts that agency and arranges for the person to be sent there and the proper language services scheduled.

MOPD provides access to its essential documents in the various languages both upon request as well as posting translated versions on our website.

We will evaluate the effectiveness of our efforts by tracking various metrics such as (i) the number of documents translated into other languages, (ii) the number of documents distributed in languages other than English, (iii) the number of interpretations requested and the language requested and (iv) the number of visits to MOPD's website for information in languages other than English.

MOPD will review the metrics annually and modify the plan if necessary to address any changes observed from the data collected.

3. Limited-English Proficient Population Assessment

To properly assess language access needs for LEP individuals and to comply with the applicable laws, MOPD applies the United States Department of Justice 4-Factor Analysis.

a. Factor 1 – LEP population served or encountered

Nearly 25% of New Yorkers are considered LEP individuals this means they have limited ability to read, speak, write or understand English. If we apply this percentage to the 943,208 people who have self-identified as having one of more disabilities, there are approximately 235,802 people with disabilities with LEP.

b. Factor 2 - Frequency of contact with LEP individuals

Currently MOPD tracks calls obtained through 311 and number of visits to our website translated into a language other than English. For calendar year 2017 the following interpretation services via 311 have occurred:

Arabic – 4

Bengali – 7

Chinese – 42

French – 3

Haitian Creole – 7

Korean – 5

Polish – 1

Russian – 90

Spanish – 980

Urdu – 0

MOPD's website was translated into the ten languages as follows:

Arabic – 14

Bengali – 3

Chinese – 28

French – 20

Haitian Creole – 1

Korean – 13

Polish – 1

Russian – 31

Spanish – 209

Urdu – 0

The majority of our in-person requests are for ASL interpreters, however we have also had individuals who request interpreters for Spanish - 8, Chinese - 2, and Russian - 1 while visiting our office. MOPD tracks the requests for interpreters both for telephone callers and in person visits in our call log by making a note of the language requested. As we have a small number of in person visitors we utilize the call log to track the information as many of these in person visitors are individuals who have previously called our office or information will be provided via subsequent telephone conversations.

c. Factor 3 - The importance of the program, service, or information

MOPD tracks the services rendered for individuals who need information in another language (see chart above) and will continue to track the provision of interpretation and translation services as we understand the consequences of lack of language services or inadequate interpretation or translation. In fact, MOPD not only tracks the information but provides feedback to the provider by outlining any problems to the procurement staff at DCAS, we do this particularly for language access for people who are Deaf and require ASL interpretation or Hard of Hearing and request CART services.

d. Factor 4 - Resources available to the agency and the costs of providing various types of language services

As discussed more below, MOPD leverages staff language skills in providing both translation and interpretation services for basic information such as name and topic of inquiry. The appropriate staff member then calls Language Line to obtain the appropriate interpreter.

From the information above, Spanish is the language most frequently requested for both interpretation and translation services. We are able to accommodate these requests by utilizing staff and Language Line.

Our largest challenge is the need for documents to be translated into the languages we do not have available from staff members. Identifying someone who can perform the service is often difficult.

4. Provision of Language Access Services

a. Interpretation Services

MOPD provides, and will continue to provide, interpretation services over the telephone by utilizing employees who speak another language with proficiency including Spanish, Arabic, Urdu, Russian, Bengali, and American Sign Language. In addition, we utilize Language Line which provides interpretation services in more than 150 languages including the ten languages outlined in Local Law 30.

We provide interpretation services for individuals who visit our offices located at 100 Gold Street, New York, New York.

MOPD supports LEP needs during an emergency response through our partnership with NYC Emergency Management (EM). We insure that our partner agencies receive AWS messages and that individuals register for Notify NYC which offers emergency notifications via e-mail or on a mobile device in 13 languages, including ASL. In fact, MOPD was instrumental in ensuring any televised appearances by the Mayor during an emergency include an ASL interpreter. Finally, we distribute all of EMs materials including those translated into the various languages.

b. Translation of Essential Documents

Currently our most essential document, the Accessibility Waiver Application, is provided in Spanish, Chinese, Russian, Korean, Bengali, and Haitian Creole. We are currently having it translated into Arabic, Urdu, French, and Polish.

Some of our other informational materials are available in Spanish and Russian including Federal Tax Incentives for Making Your Business Accessible fact sheet, Accessible Entrance Signage Guide, Gaining Access into a Business Guide, and the Web Accessibility Checklist. These documents are being translated into the other eight languages.

c. Plain Language Principles

MOPD makes every effort to utilize the principals of plain language when developing materials and web content. We write in short, clear and simple sentences and use applications such as Readable.io to check readability and grade level.

5. Training

MOPD provides its staff with information on how to contact Language Line and ASL interpreting services. We provide this information to existing staff and all new staff. In addition, we provide staff with information on the translation of our various public materials.

The staff at MOPD interacts with each other on a daily basis. Thus, MOPD's entire staff has access to its Language Access Coordinator, Christian Valle. Christian is available to answer staff questions and to assist in obtaining translation and interpreter services.

6. Record Keeping and Evaluation

MOPD understands that a key component to provide meaningful services, including language access, is gathering data and analyzing it to ensure that the services are available, being utilized, and improved upon when an issue is identified. MOPD staff will convey any issues to the Language Access Coordinator who will continue to track information and data as per the information provided above. If needed, the Language Access Coordinator will contact the vendor to inform them of any issues that may occur and request that certain interpreters are not used if poor performance continues. The Language Access Coordinator will also track any comments and feedback received concerning the translation of documents and will have any errors corrected.

7. Resource Analysis and Planning

As MOPD is a tightknit office, we work closely and are all aware of the various languages spoken by staff members including Spanish, Arabic, Urdu, Russian, Bengali, and American Sign Language. These staff members then assist with the initial contact with the individual and assist the Language Access Coordinator in identifying the needed interpreter who then contacts the appropriate vendor to provide interpretation services in the language needed including the ten languages outlined in Local Law 30.

Finally, MOPD will utilize resources in other city agencies including those provided by MOIA.

8. Outreach and Public Awareness of Language Access Services

MOPD will feature the Language Access Plan on its website and provides a translation application so that the contents of its website can be translated into over 100 languages.

Also, individuals who communicate via ASL are able to go to MOPD's website to connect to ASL Direct via a link and begin communicating with a person who appears on their device's screen and communicated via ASL.

9. Language Access Complaints

MOPD's Language Access Coordinator in conjunction with its General Counsel will monitor and respond to public complaints regarding language access. The complaints will be dealt with under the same structure and time frame as outlined in MOPD's Grievance Procedure posted on its website at <http://www1.nyc.gov/site/mopd/laws/mayors-office-for-people-with-disabilities-grievance-procedure.page>.

Complaints received via 311 or directly will be treated in the same manner and reported annually.

The report will indicate the nature of the complaint, date received, final resolution, and date of resolution.

10. Implementation Plan Logistics

MOPD's Language Access Coordinator is Christian Valle, Accessible Communication Coordinator.

MOPD's Language Access Plan is currently in place. In FY2019 we will update the statistics we use for identifying New Yorkers with Disabilities to better reflect those who also fall into the category of LEP.

The translation of Accessibility Waiver Application into Arabic, Urdu, French, and Polish will be accomplished in FY2018. In addition, other informational materials including Federal Tax Incentives for Making Your Business Accessible fact sheet, Accessible Entrance Signage Guide, Gaining Access into a Business Guide, and the Web Accessibility Checklist are currently available in Spanish and Russian. These documents will be translated into the other eight languages and posted on the MOPD website in FY2019.

MOPD's Language Access Plan will be updated every three years with annual reporting as provided above. The Plan will be posted on MOPD's website by June 30, 2018.