

Language Access Implementation Plan



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Table of Contents

I.	Language Access Coordinators	2
II.	Mission and background	2
III.	Language access policy and goals	3
IV.	Language Access Implementation Plan accomplishments and progress on goals.....	4
V.	Limited English Proficiency population assessment.....	7
	Factor 1: Demographic analysis	7
	Factor 2: The frequency of contact with Limited English Proficiency individuals	7
	Factor 3: Nature and importance of services.....	9
	Factor 4: Resources available for language assistance	9
VI.	Provision of language access services.....	10
	Document translation services	10
	Telephonic interpretation services.....	10
	Language access in agency communications	11
	Plain language	11
	Policies and procedures	11
	Notification of free interpretation signage	12
	Beyond the required ten languages	12
	Emergency preparedness and response.....	13
VII.	Training	13
VIII.	Record keeping and evaluation	14
IX.	Resource analysis and planning	15
X.	Outreach and public awareness	16
XI.	Language access complaints	16
XII.	Implementation plan logistics	17

I. Language Access Coordinators

The Language Access Coordinator for the Office of Technology and Innovation (OTI) is Elsa Hampton, who serves as the agency's Chief Equal Employment Opportunity (EEO) Officer. OTI's Language Access Implementation Plan (LAIP) can be found on the OTI website.

OTI manages both the operations and technology for New York City's 311 Customer Service Center, which is our primary means of interacting with the public. Given the central role that 311 plays in providing government information and services to the public, 311 also has its own Language Access Coordinator, Michael Hutchinson, whose title is Contracts and Finance Director. This information is accessible on the 311 website.

II. Mission and background

OTI Connects NYC

OTI primarily serves City agencies by maintaining the core technology infrastructure and platforms that power many City systems. OTI also helps agencies build the vital programs that are central to their work of delivering services to New Yorkers. Whether it's public safety, human services, or economic development, OTI's goal is always the same: to make New Yorkers' lives better by leveraging technology to connect them to the government services on which they rely every day. The 311 Customer Service Center and the NYC.gov platform, the City of New York's official website, are the primary channels through which OTI interacts with the public.

The 311 Customer Service Center first became operational in March 2003. Its mission is to provide the public with quick, easy access to all New York City government services and information. The 311 Customer Service Center supports over 100 City agencies, offices, and other government entities and is the primary vehicle used by residents, businesses, and visitors throughout the five boroughs to obtain non-emergency government services and information.

By dialing one, easy-to-remember telephone number, a caller can obtain information from a knowledge base of over 2,000 articles, which provide pertinent details on government services and information.

Calls to 311 are answered 24 hours a day, 7 days a week, 365 days a year. Services include providing information, processing service requests for various City agencies, taking complaints from callers about City services, and making referrals to certain city, state, and federal government agencies.

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

OTI and 311 work closely to help agencies improve service delivery by allowing them to focus on their core business and manage their workload efficiently. OTI also provides insight into ways to improve through accurate and consistent measurement and analysis of citywide service delivery. 311 maintains liaisons with City agencies to develop and maintain updated content specific to the agencies' service offerings. This information is shared with callers seeking detailed information about the services provided by those agencies.

In 2018, the Department of Citywide Administrative Services (DCAS) renewed their contract with Language Line Solutions (Language Line) for telephone interpretation and language translation services. 311 currently uses Language Line for both of these services. The DCAS contract was designed to permit all City agencies to establish a Task Order under their Primary Agreement. This eliminates the need for other agencies to undertake a Request for Proposal (RFP) process for language interpretation and translation services, and agencies benefit from the economies of scale available under a citywide Primary Agreement.

OTI also hosts and maintains the NYC.gov platform, providing technical support for approximately 200 separate public websites for City initiatives, agencies, and offices that, in turn, are responsible for managing their own site content. In 2015, OTI implemented the Google Translate widget across NYC.gov. Google Translate enables all agencies to provide dynamic, real-time translation of web pages into more than 100 languages.

III. Language access policy and goals

OTI has demonstrated its long-standing commitment to making government information and services more accessible to all New Yorkers through both its 311 Customer Service Center and its citywide public-facing websites, including the City's official web platform, NYC.gov, and other, more recently developed web-based applications. OTI is also committed to working closely with elected officials, community partners, and members of the public to improve service delivery for individuals with limited English proficiency (LEP) and to enhance the overall customer experience for all New Yorkers.

311 began providing telephonic interpretation and translation services prior to Executive Order 120 issued in 2008 and Local Law 30 passed in 2017. All services provided by 311 are available to LEP individuals, regardless of the language spoken. 311 routinely informs customers of the availability of interpretation services with an upfront Interactive Voice Response (IVR) message. Providing non-English callers with the option to speak in their native language or the

language they are most comfortable speaking, encourages them to contact 311 for assistance obtaining government services or information.

311 has included service level agreements on the time it takes to connect to an interpreter in their contract with the language services provider. Reducing the time it takes customers to connect to an interpreter is a goal of 311 because it improves the overall customer experience. 311 also piloted and will continue to perform customer satisfaction surveys in languages other than English to help gauge the experience of its LEP customers.

Furthermore, OTI implemented the Google Translation widget across the updated NYC.gov platform in 2015. OTI maintains, manages, and supports, the standard template for NYC.gov, which provides City agencies with a web-based, language translation solution that is hard-coded into the template, prominently displayed, and easy for visitors to use. OTI also provides meaningful language access by overseeing the technical review and implementation of alternate solutions that utilize manual and machine-based translations.

Finally, as the City's technology leader, OTI has been positioned to develop innovative and vital web-based solutions to connect New Yorkers with necessary government services, especially important during a time when many offices were effectively closed to the public. Some examples over the past year include the technology that underlies: GetFood, Contact Tracing, Personal Protective Equipment (PPE) donations, Vaccine Finder, and VAX4NYC. These programs were built from the ground up with the goal of serving all New Yorkers by prioritizing language translation.

IV. Language Access Implementation Plan accomplishments and progress on goals

311

311 is currently mandated to answer 80% of all calls within 30 seconds. It is the goal of 311 to ensure that the average time to have a telephonic interpreter in the four most-commonly-requested languages of Spanish, Cantonese, Mandarin, and Russian, is also 30 seconds or less. Additionally, 311 provides access to health and human services in over 175 languages via its 211 dialing protocol. In April 2008, 311 introduced a multi-lingual IVR system interface, which was upgraded in 2018 to enhance non-English functionality. This enhancement included a direct dialogue feature to the Spanish call flow that enables customers to speak in Spanish via the IVR. All callers that select the language options via the IVR are informed in their language that a representative will bring an interpreter on the line for assistance. During 2020, over 1,068,000 callers selected the option offered by the IVR indicating their interest in being serviced in the language of their choice.

In 2019, additional functionality was integrated to further assist customers requiring interpretation services. Call Center Representatives (CCRs) are now informed of the customers' preferred language via a screen prompt as soon as the call is

answered. This improves the customer experience as an interpreter can be quickly engaged in the preferred language without the need for language triage. This service provides customers 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” and COVID-19 information in their native language. This both shortens the wait time for customers seeking this information and eliminates the need for an agent or an interpreter to answer the call. After the recording, customers still have the option of requesting assistance in any of the over 175 other languages available via Language Line, including those designated under Local Law 30, which are Arabic, Bengali, Chinese – Simplified and Traditional, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu.

In 2020, 311 piloted its first online customer satisfaction survey in languages other than English. This survey was available in all ten languages identified under Local Law 30. Additional surveys in these languages will be conducted throughout the year to assess LEP customer satisfaction with various services provided by 311.

During the COVID-19 pandemic, 311 added surge-call takers through its contracted vendors. 311 directed the vendors to prioritize staffing bi-lingual (English and Spanish) agents across all shifts. 311 also directed vendors to utilize Language Line for non-English language calls as necessary.

Goal	Update
Multi-lingual IVR Enhancement	Natural Language Understanding (NLU) - direct dialogue enabled in Spanish
	Enabled option via screen pop to identify customers’ preferred spoken language to call takers when calls are answered
Surveys	Developed and piloted online surveys in LL30 languages

NYC.gov

NYC.gov, the City’s official website, is the virtual home of almost all NYC agencies, and serves over 300,000 visitors a day, delivering important government information and critical services to New Yorkers. During the COVID-19 pandemic, when many of the City’s physical offices were closed to the public, NYC.gov assumed an even greater role. New sites and pages were quickly rolled out, already hard-coded to be digitally accessible, mobile-responsive, secure, and language-translatable. It helped New Yorkers find food assistance, employment assistance, PPE, testing sites, and updates about the status of schools, businesses, and houses of worship. NYC.gov played a vital role in helping to keep all New Yorkers informed, safe, and connected. NYC.gov utilizes the Google Translate widget that allows any content to be translated into more than 100 different languages.

GetFood

New York City was hit extremely hard by the COVID-19 pandemic, and this unprecedented public health crisis was made worse by increased food insecurity for some of the City's most vulnerable residents. OTI developed an application that connected elderly, sick, and homebound New Yorkers with the City's emergency food distribution program. The same application was used to engage thousands of idle TLC-licensed drivers to help with the deliveries. The accessible technology was built to be translated into 12 languages other than English to assist New Yorkers most in need with obtaining meals. Those languages are Spanish, Chinese, Russian, Bengali, Arabic, Korean, Polish, Italian, French, Urdu, Yiddish, Haitian Creole. At its peak, the program delivered one million meals a day.

NYC's Vaccine Finder

OTI built the nyc.gov/vaccinefinder, an interactive site that has become a one-stop shop where eligible New Yorkers can find the closest vaccine provider. The website utilizes the Google Translation widget to make real-time information available in over 100 languages regarding the availability of appointments for hundreds of vaccine sites citywide, including city, state, and private-provider locations. The Vaccine Finder also provides location-specific information about which vaccine is being distributed, what restrictions apply, and even offers directions.

VAX4NYC

OTI also built the platform that manages the scheduling of vaccination appointments for hundreds of vaccination clinics citywide. The public-facing site has been human translated into 10 languages for accessibility, including Arabic, Bengali, Chinese – Simplified and Traditional, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu.

The system also manages every aspect of a patient's vaccination from the time they create an initial appointment through to completion of their second dose. The system powers the operations at the vaccination sites, including patient check-in, screening, sending a record of the vaccination to the City's Immunization Registry, and scheduling of second dose appointments.

To prevent New Yorkers who may lack an internet connection from being disadvantaged in the appointment scheduling process, OTI set up a vaccine-scheduling call center, where agents can schedule vaccine appointments at all sites that the VAX4NYC platform serves. This call center has both English and Spanish speaking call takers and utilizes Language Line to assist callers in over 175 different languages. Additionally, the IVR recording that callers hear when they dial the call center includes prompts for English, Spanish, Russian, Mandarin, Cantonese, Korean, and Haitian Creole.

V. Limited English Proficiency 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 require agencies providing direct and emergency public services to provide services in 10 languages. These languages were identified by the Mayor's Office of Immigrant Affairs (MOIA) based on an assessment of the US Census data from the Department of Education. The languages are Spanish, Russian, Mandarin, Cantonese, Bengali, Haitian Creole, Korean, Arabic, French, Urdu, and Polish. 311 has provided telephonic and translation services since 2003 as required, in over 175 languages, including the ten mandated languages. 311 routinely monitors the frequency of use of these languages.

During 2020, 311 received 23,669,428 calls. Callers required telephonic interpretation assistance in 99 languages. The top ten languages/dialects requiring interpretation assistance by the calling public were Spanish, Mandarin, Russian, Cantonese, Korean, Haitian Creole, Bengali, Polish, Arabic, and French. These languages represented approximately 99% of the telephonic interpretation service minutes provided by Language Line in 2020.

Factor 2: The frequency of contact with Limited English Proficiency individuals

311

In 2020, 311 received 23,669,428 calls, of which 799,955 required interpretation services. Language Line provided assistance on 354,000 of those calls in 99 different languages, including Spanish, which accounted for just over 242,000 calls. Compared to calendar year 2017, there has been an increase of 160,705 calls where Language Line services were used. Additionally, 311 employs Spanish-speaking Call Center Representatives who handled another 446,000 calls in Spanish without the need for a Language Line interpreter.

311 obtains information from other agencies that assist in determining specific language requirements for targeted outreach programs. Over 94% of LEP callers to 311 request interpretation services in Spanish, Mandarin, Russian and Cantonese. The remaining 6% request interpretation in other languages. All LEP individuals, regardless of language, are eligible for telephonic interpretation services. During a call with an LEP individual where interpretation services are engaged and 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.

Language Line call volumes, broken down by the frequency of each language requested, are reviewed monthly by 311 and shared with the Mayor's Office of Immigrant Affairs quarterly to assess changes in the LEP population.

NYC.gov

Over the past year, over 125 million visitors accessed pages across the almost 200 websites hosted on the NYC.gov platform. This represents an increase of approximately 15% over the prior year, while the use of the Google Translation widget during the same period increased by 25%, showing greater utilization by LEP individuals.

During that time, the public used the widget over a million times to translate content in the following languages: Spanish: 41%, Chinese (Simplified): 15%, Russian: 4%, Chinese (Traditional): 3.5%, Korean: 2%, Arabic: 2%, Bengali: 2%, French: 1.5%, Japanese: 1%, Polish: 1%. Haitian Creole: 1%, Yiddish: 1%, Italian: .5%, and Urdu: .5%.

GetFood

Approximately 125 million meals were delivered to New Yorkers via the web-based GetFood program application during calendar year 2020 and the first half of 2021. That application can be translated into 12 languages other than English, and almost a quarter of all users employed the translation feature to access content in the following languages: Spanish: 81%, Chinese: 11%, Russian: 4%, Bengali: 1%, Arabic: 0.5%, Korean: 0.5%, Polish: 0.5%, Italian: 0.5%, French: 0.25%, Urdu: 0.25%, Yiddish: 0.25%, Haitian Creole: 0.25%.

NYC's Vaccine Finder

Since its launch in early January, about 20 million people have visited the Vaccine Finder website. The Google widget was used approximately 530,000 times, or 3% of the time, to translate webpage content into the following languages: Spanish: 30%, Chinese (Simplified): 22%, Yiddish: 6%, Chinese (Traditional): 5%, Korean: 4%, Bengali: 3%, Russian: 3%, Arabic: 3%, French: 2.5%, Italian: 2%, Polish: 2%, Urdu: 1.5%, Haitian Creole: 1%. Japanese: .1%.

VAX4NYC

The VAX4NYC website is fully accessible in the 10 languages required under Local Law 30.

The VAX4NYC Call Center has both English and Spanish-speaking agents on staff. For other languages, the call center has the ability to connect to Language Line, which supports over 175 languages. The IVR recording that callers hear when they dial the call center includes prompts for English, Spanish, Russian, Mandarin, Cantonese, Korean, and Haitian Creole. Agents are trained to recognize when Language Line would help them communicate with a caller. Language Line is also designed so that the correct language can be identified quickly, and a translator conferenced into the call. City vaccination sites are further equipped with Video Remote Interpretation (VRI) for 40+ languages including American Sign Language and audio interpretation for over 175 languages.

Of the 2 million appointments that have been made through nyc.gov/vax4nyc, only approximately 1,500 have used the language translation feature. Of that group, the top translated languages were Chinese: 88%, Spanish: 10%, Korean: 0.8%, and Russian: 0.2%. Of the nearly 380,000 calls taken by the call center, almost 25% of

them used language translation services. Language translations were routinely conducted in Spanish: 79%, Mandarin: 15%, Cantonese: 2.5%, Russian: 2%, Korean: 1%, and Haitian Creole: 0.5%.

Factor 3: Nature and importance of services

The 311 Customer Service Center 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, including the Department of Housing, Preservation and Development, the Department of Transportation, the Department of Social Services' Human Resources Administration, etc. Without an interpreter, callers would not be able to obtain the information required to make informed decisions regarding their eligibility or how to access the services offered by many City agencies.

Over the last decade, people have increasingly moved online for access to information about important City services. As traffic has grown, so has the need to meet the public where they are, responsive to their mobile devices, and in the languages they speak. The NYC.gov platform is home to the vast majority of City agency and program websites, and it plays a vital role in connecting New Yorkers with government services. During the pandemic this past year, when it was difficult or impossible to receive services in person, connecting online became essential. OTI helped agencies pivot by providing new and innovative solutions to connect New Yorkers with vital services, such as GetFood, the Vaccine Finder, and the VAX4NYC website and call center.

Factor 4: Resources available for language assistance

OTI and 311 provide various means for LEP New Yorkers to obtain access to City services and information.

- Messages in languages other than English have been included in 311 upfront IVR messaging solution for all callers.
- 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 provides language assistance on these channels.
- Posters are displayed in a variety of languages to emphasize to staff and visitors 311's ability to communicate with the public in multiple languages.
- 311 also piloted an online survey available in multiple languages other than English to gauge LEP customer satisfaction. The survey was provided to better understand customer needs and their perception of the service offerings. The responses are being used to improve service delivery where possible. Future online surveys in multiple languages are being considered.

- OTI implemented the Google Translate widget across the NYC.gov platform to help agencies provide for the dynamic, real-time translation of their webpages into more than 100 languages.
- OTI also oversees the technical review and implementation of alternate solutions that utilize manual and machine-based translations on specific applications, as needed.

OTI and 311 utilize the citywide Primary Agreement for telephonic language interpretation and translation services. In 2020, the cost incurred to provide these services was approximately \$1,951,000. Over \$860,000 of this was used by 311 for telephonic language interpretation and document translation, and approximately \$1,088,000 was used to support the City's contact tracing program and other initiatives of the Test & Trace Corps.

VI. Provision of language access services

Document translation services

Neither OTI nor 311 routinely require document translation services to fulfill its mission, as neither regularly distributes documents to the public or the media, or place documents on New York City's Language Gateway. There are no essential documents that require translation at OTI or 311. However, OTI and 311 do utilize the citywide Primary Agreement with Language Line to provide these services when required to improve service delivery. All translation requirements (i.e., voice recordings or document translations) are determined on a case-by-case basis and are managed by the Language Access Coordinator. In most cases, where possible, in-house staff will also review translations provided by Language Line for accuracy.

In 2020, 311 piloted its first online customer satisfaction survey in multiple languages, which were Arabic, Bengali, Chinese – Simplified and Traditional, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu. This will continue as a means of evaluating services provided to LEP individuals and improving service delivery where necessary.

Telephonic interpretation services

311's business model provides around-the-clock interpretation services for all callers -- 24 hours a day, 7 days a week, 365 days a year -- and has done so since 2003. This service is currently available in over 175 languages (including the 10 languages covered by Local Law 30) via Language Line.

311 is mandated to answer 80% of all calls within 30 seconds and must provide access to health and human services via its 211 dialing protocol in over 175 languages. Service level requirements are in place for the vendor that provides telephonic interpretation. It is the goal of 311 to provide a telephonic interpreter in

Spanish, Cantonese, Mandarin, and Russian, the four most-commonly-requested languages, within 30 seconds.

In calendar year 2020, 311 completed 799,955 calls requiring an interpreter in 99 different languages.

Language access in agency communications

311 utilizes a variety of channels to communicate with New Yorkers. On its primary social media channels, which are Twitter and Facebook, 311 communicates in English and Spanish. 311's online channel (i.e., 311 Online) via the NYC.gov website offers the ability to translate all 311 online content into over 100 languages. Additionally, 311 implemented a new channel allowing New Yorkers to send text messages to 311692 in both English and Spanish, to access services. There are plans to grow this service in additional languages as resources permit.

In 2008, a multi-lingual IVR system interface was first introduced and was subsequently upgraded in 2019 to provide enhanced non-English functionality. Callers can now communicate with the Natural Language Understanding (NLU) interactive speech application using direct dialogue in Spanish. NLU allows Spanish-speaking customers to ask their questions and receive answers in a natural language mode. The IVR service also provides callers who speak Spanish, Mandarin, Russian, Cantonese, Korean, and Haitian Creole with the option of listening to current 311 pre-recorded announcements such as "alternate side of the street parking" and COVID-19 information in their primary language. This shortens the wait time for callers seeking this information and eliminates the need for an agent or an interpreter to answer the call. During 2020, over 1,068,000 callers selected the IVR option to indicate their desire to be serviced in a language of their choice. After listening to the recording, callers have the option of requesting assistance in any of the other available languages, including those covered by Local Law 30. 311 will monitor feedback received from the public via its ongoing customer satisfaction surveys as a means of improving language access via the IVR and other channels.

Plain language

311 embarked on a plain language initiative in 2011. All content in its Customer Relationship Management (CRM) system used by Call Center Representatives now appears in simple, clear, and concise language, free from extraneous words or technical jargon, for ease of understanding by members of the public.

Policies and procedures

311 provides telephonic interpretation and translation services during day-to-day operations, as well as during emergencies. Customers contacting 311 are always advised of the availability of language assistance services. Additionally, Call Center Representatives are trained how to interact with LEP individuals to provide language accessibility for all callers or engage Language Line for assistance.

It is the role of the designated Language Access Coordinator to manage language access services as follows:

- Coordinate over the phone interpretation and document translation services via the approved contract vendors, and proactively manage the contractual relationship for these interpretation and translation services.
- Coordinate effective and timely interpretation and translation service for 311 service requests, complaints, correspondence, or other documents requiring translation.
- Document and report on the translation services requested and provided.
- Oversee the operational relationship with each interpretation and translation vendor.
- Collaborate with DCAS and OTI's citywide contract's team on the provision of language access services related issues.
- Monitor vendor compliance with contractual service level agreements.
- Manage all internal document translation requests on behalf of OTI and 311 with the vendor.
- Support the internal and external training, quality assurance, and operations teams at 311 and the vendor for interpreter and translator related items.
- Routinely review escalated calls for quality assurance purposes related to Language Line usage.
- Refer service problems through the vendor's Voice of the Customer (VOC) process.
- Interact with OTI's telephony and IT personnel regarding technical issues encountered with Language Line and escalate to the vendor, if necessary, for resolution.

The Language Access Coordinators continue to monitor, maintain, and make recommendations to enhance, whenever possible, access to language services.

Notification of free interpretation signage

Neither OTI nor 311 have walk-in centers for the public. However, translated signs are displayed in the ten designated languages, as required by Local Law 30, in 311's call centers to emphasize to staff and visitors our ability to communicate with the public in multiple languages.

Beyond the required ten languages

Customers contacting 311 can speak with an interpreter in over 175 languages through Language Line. An interpreter is available immediately via conference call to triage the desired language of the customer and provide the appropriately skilled interpreter whenever language assistance is required.

Emergency preparedness and response

In case of emergency, 311 has a contingency plan that includes redundancy provided by an outsourced vendor. This allows for continuity of call taking services in the event of an emergency to ensure uninterrupted language accessibility. 311 maintains its ability to continue operations despite a natural disaster or other emergency as part of its Continuity of Operations Plan (COOP), as was demonstrated during the COVID-19 pandemic.

Additionally, Language Line's service level agreement for document translation requires accessibility to rush translation requests in the event of an emergency.

VII. Training

All frontline 311 staff are trained on providing language services as new hires. There is also ongoing coaching and monitoring of calls to reinforce the need for, and importance of, language accessibility for callers.

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 CCRs are taught how to interface with LEP individuals, as follows:

- CCRs are instructed on how to handle a call when they are unable to readily identify the caller's language.
- CCRs 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.
- CCRs utilize Computer Telephony Integration (CTI), which allows them to connect almost instantly to Language Line and conference an interpreter into the call.
- CCRs are trained to speak to the caller through the interpreter so that the caller receives the same service that an English-speaking caller would receive.
- During new hire training, 311 trainers review the prescribed tips for handling Language Line calls.

Internal bilingual Spanish-speaking staff at King Teleservices (a virtual offsite contact center utilized to support 311 during high call volume) must pass a language assessment test approved by the City to be qualified to handle 311's Spanish calls. 311's vendors, Language Line and Voiance, employ professional interpreters with years of experience and highly qualified testers to administer an Interpreter Skills Assessment Test. Interpreters are assessed on their ability to speak clearly, remain neutral, maintain 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 week orientation program and ongoing training and coaching.

OTI, partnering with the Mayor's Office of People with Disabilities (MOPD), regularly offers digital accessibility trainings to City agency communications and web staffers. The trainings are mandatory before new sites are launched, and they have recently been conducted to help agencies audit their own web products. During the trainings, attendees are made aware of the advantages and limitations of the Google Translate widget. Agencies are encouraged to use plain language whenever possible and are informed of potential translation services available through MOIA. In the past year, OTI and MOPD have offered 30 digital accessibility training sessions.

OTI is an equal opportunity employer that is committed to upholding federal, state, and city EEO laws, as well as citywide EEO policies and procedures. During new hire training, as part of the customer service component, 311 CCRs are trained to be sensitive to the caller's needs and on how to professionally interact with LEP individuals. OTI and 311 personnel also receive an EEO orientation class that addresses cultural diversity in the workplace when communicating with external customers. Posters written in a variety of languages are positioned throughout the 311 Call Center to remind personnel about the about the need for sensitivity when serving the diverse population of 311 callers.

VIII. Record keeping and evaluation

All calls to 311 are recorded and all metrics related to language assistance services are readily accessible at 311 or via the vendor's portal. 311 maintains data pertaining to vendor services provided, 311 IVR metrics, and the 311 staff interpretation services that are provided to the public.

The 311 Quality Assurance (QA) team monitors recorded calls daily for all shifts to ensure compliance with Executive Order 120, Local Law 30, and OTI/311 policy. Bilingual QA evaluators listen to Spanish calls and provide coaching and development to CCRs. 311 supervisory staff evaluate and coach Spanish calls. The QA team also evaluates calls handled in other languages to ensure that the English-speaking 311 call taker and the interpreter are working together to provide the caller with quality service. When a quality concern is raised by a caller, the 311 QA team, the vendor, and the interpreter are notified for corrective action. The same internal process applies to Spanish-speaking CCRs at 311.

Similarly, Language Line has a QA team that monitors live calls without the knowledge of the interpreter. A senior language specialist provides coaching, feedback, and identifies training needs and developmental opportunities.

Language Line 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 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 Access Coordinator for review and escalation to the vendor.

Language Line provides monthly and quarterly reports via their portal, which includes both the number and duration of individual calls and for all calls combined. 311 also maintains metrics on the volume of calls handled by our bilingual employees and calls handled in languages other than English by our IVR.

To ensure compliance with Executive Order 120 and Local Law 30, 311:

- Provides language access in over 175 languages and dialects.
- Monitors call volumes and consumer needs daily and monthly.
- Records and retains in accordance with 311's Privacy Policy, all calls, including those utilizing an interpreter.
- Evaluates calls handled in other languages to measure the level of customer service. This is a large responsibility of our QA team.
- Reviews Language Line call volumes by language on a monthly basis, in addition to quarterly reviews by MOIA, to assess changes in the LEP population.
- Conducts routine reviews to determine the need to hire additional bilingual interpreters for other languages besides Spanish.
- Utilizes the vendor's VOC process to assess the performance of the vendor's interpreters.
- Ensures that all vendors engaged to provide language services have contractually agreed upon service level agreements.
- Obtains feedback from Community Boards, Borough Presidents' Offices and MOIA.
- Responds to caller feedback and complaints regarding language access issues, which may result in process improvements or service enhancements.
- Updates the Language Access Plan as required.

IX. Resource analysis and planning

DCAS hosts the citywide Primary Agreement with all language service providers. 311's current vendor for interpretation and translation services, Language Line, is considered an expert in the industry. Language Services Associates, a secondary citywide vendor, provides redundant interpretation services in the event of an emergency.

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

OTI and 311 use the Volunteer Language Bank to leverage City employees who are bilingual in many languages for proofreading documents that have been translated by vendors. New York City personnel are sometimes able to make alternate translation recommendations, suggesting foreign language colloquialisms that are more widely understood by 311 callers. Internal staff are also used to evaluate IVR recordings provided by the vendor using professional voice interpreters.

As funding permits, 311's goal is to have all bilingual employees and volunteers certified through the Language Line proficiency testing. A contract is in place to provide these certification services.

X. Outreach and public awareness

311 informs the public of language assistance services through its IVR platform, 311 Online on the NYC.gov platform, social media, and text messaging channels. Translation of cultural signs and photographs are displayed inside the 311 Customer Service Center in various languages to emphasize to staff and visitors (local and international invited delegations) our ability to communicate with the public in multiple languages. OTI and 311 do not customarily distribute written materials to members of the public.

XI. Language access complaints

311 is available for the public to make complaints and to provide information and referral services to other city, state and federal agencies while completing service requests for members of the public. It serves as a conduit to receive complaints about all city agencies.

311 can receive complaints, questions, and requests pertaining to language access from the public via all its channels. A customer may choose to submit these through any of 311's online channels (e.g., NYC.gov, social media, mobile application) or may call 311 directly. 311 forwards all language access complaints and requests pertaining to 311 to MOIA's Language Access Complaint mailbox and to the Language Access Coordinator.

All complaints and requests from customers are tracked via 311's CRM system and monitored by the Language Access Coordinator. It is the responsibility of the Language Access Coordinators to assure the timely resolution of any complaints or requests from customers regarding OTI or 311 specifically. 311 reports the number of complaints received in its Language Access Plan annually and reports the number of language access requests as well.

XII. Implementation plan logistics

The 311 Customer Service Center provides meaningful language access in over 175 languages and has been language accessible since early 2003. Existing contracts with our vendors currently address the full scope of the services required to maintain compliance with Local Law 30. Additionally, OTI’s NYC.gov platform has included the Google Translation widget since 2015, making webpages accessible in over 100 languages. Neither OTI nor 311 issue licenses or permits to their customers and, unlike some agencies, do not have walk-in centers for the public.

OTI and 311 currently meet all requirements of Executive Order 120 and Local Law 30. 311 continues to maintain a plain language standard, which has been implemented for several years. OTI and 311 will continue to review policies, procedures, and services to ensure compliance. OTI and 311 will utilize feedback received from the ongoing customer satisfaction surveys to improve services to the LEP population.

Language Access Goal	Milestones	Responsible Staff	Deadline
Deploy additional customer satisfaction surveys in additional languages	Delivered the first customer satisfaction survey available in multiple languages in 2020	311 Customer Management Team	Not applicable