



DEPARTMENT OF RECORDS & INFORMATION SERVICES

Language Access Plan



NYC DEPARTMENT OF RECORDS & INFORMATION SERVICES LANGUAGE ACCESS PLAN

Name and Title of Language Access Coordinator:

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I. Agency Mission and Background

The New York City Department of Records and Information Services (DORIS) operates the Municipal Archives, the Municipal Library and the Municipal Record Center. The agency fosters civic life by preserving and providing access to 243,000 cubic feet of historical and contemporary City government records, ensures that City records are properly maintained following professional archival and record management practices, develops and enforces record management policies and makes materials available to diverse communities both online and in person at the Municipal Library, Municipal Archives and Visitor Center.

Agency's Direct Public Service Divisions: There are three divisions within the Department that interact with the public: the Municipal Library, Municipal Archives and Outreach/External Affairs. This language access plan is designed to provide language access services to these divisions as well as on the agency's website. By providing comprehensive language access services, any patron regardless of language capability may be able to utilize the agency's vast collections.

The Municipal Library provides reference services, oversees an online repository of reports from City agencies and operates a research library open to the public. The holdings are published documents that show the evolution of New York City government from the 19th Century to the present. The collection is comprised of reports, press releases, maps, indexes, and clippings. The Municipal Archives preserves and makes available New York City government's unpublished historical records dating from 1645 to the present. The collection includes office records, manuscript material, still and moving images, ledgers, birth death and marriage records, maps, blueprints and sound recordings. The External Affairs division interfaces with the public via social media platforms, the agency website, lectures, exhibits and public program activities.

II. Agency Language Access Policy and Goals

The Department of Records and Information Services has updated its previous Language Access Plan to guide the agency in serving patrons who have limited English language proficiency. This plan will ensure that all patrons and prospective patrons will receive professional treatment regardless of the language they speak. The agency will publish the Plan on its website and update the language access plan every three years or sooner if needed.

In accordance with the agency language access policy, the agency will:

- Provide language access services in the ten designated citywide languages.
- Provide telephonic interpretation services in at least 100 languages using the designated city vendor.
- Post multi-lingual signage regarding the availability of free telephonic interpretation services.
- Provide training to staff in the language access plan procedures.
- Update its Volunteer Language Bank.
- Develop reporting mechanisms to measure services delivered and complaints received.

The agency Language Access Coordinator (LAC) will monitor the plan with the assistance of the directors of the divisions. The LAC will hold semi-annual meetings with the staff of these divisions to discuss and implement changes and improvements to the Plan. The LAC will also develop a reporting template which the division directors will use to submit quarterly reports. Each quarterly report will document the interpretation services received and the languages requested.

III. LEP Population Assessment

The Department will provide language access services in ten designated citywide languages: Spanish, Chinese, Russian, Korean, Bengali, Haitian Creole, Arabic, Urdu, French, and Polish. These ten languages were designated based on findings from an assessment conducted by the Mayor's Office of Immigrant Affairs.

This agency plan was updated and on its implementation was designed and rolled out with consideration given to the U.S. Department of Justice "four factor analysis."

Factor 1. The Department has three divisions that have direct contact with the public: The Municipal Archives, the Municipal Library and the External Affairs Group all located at 31 Chambers Street. According to the 2014 American Community Survey, the following are the top languages spoken at home by a Limited English Proficient (LEP) Population in New York City: Spanish, Chinese, Russian, Bengali, French Creole, Korean, Arabic, Yiddish, Italian, Urdu, Polish, and French.

It has been the agency experience that speakers of these languages are not our primary customer base. Even so, the agency will provide language access to patrons who are not English language proficient. In FY 2017, the Archives responded to 34,495 requests for copies of vital records and a total of 53,890 requests for information or research services (this figure includes the vitals, plus walk-ins, emails, etc.). None required language interpretation services. The Municipal Library received 1,702 requests for information or research service. No requests for language services was received. The agency hosts exhibits and has translated materials into Spanish, Chinese, Arabic and Braille.

Although in the past the agency has not received any requests for language services, the revised language access plan will build on the current capacity to provide language access. The plan and/or future updates will incorporate data to evaluate the language access needs of our customers, including identifying supplemental languages.

Factor 2. As stated above a review of language access requests for the last fiscal year shows there have been no language access requests submitted. This could indicate that researchers do not require language access services and do not need interpretation services. However, to ensure accuracy of language access needs, the divisions with direct public contact will maintain a service log, and document whether any interpretation services were performed. The divisions will gather this data from May 2018-September 2018. The monthly log will track how many patrons required interpretation services and which language was requested.

Factor 3. The Department strives to provide equal services to all our patrons no matter what language they speak. The updated Plan may bring in a new customer base that previously may have been unaware of our resources. It has always been the Department of Records critical objective to increase the volume and availability of, and access to, public records and publications. The updated Plan will help the agency continue to respond promptly to all research requests no matter the language spoken by the requestor.

Factor 4. The agency has in place a service contract with VOIANCE a DCAS vendor to provide telephonic interpretation services in over 100 languages. Currently the department is evaluating vendors to provide document translation services and in-person interpretation services. Our existing agency volunteer language bank, which currently can provide language interpretation in the following languages; Spanish, Cantonese, Italian, French, French Creole, Russian, Gujarati, Punjabi, and Hindi will be utilized to communicate one-on-one with an LEP patron.

Based on the above four factor analysis the agency has outlined its language access needs and has updated its language access plan to ensure all New Yorkers regardless of language ability are able to access and utilize the agency's resources.

IV. Provision of Language Access Services

The Department will provide telephonic interpretation services in the divisions accessed by the public through VOIANCE a contracted DCAS vendor.

Interpretation requests may occur in the Municipal Library and Archives divisions when an LEP patron requests assistance to order a copy of a Death, Birth, and/or a Marriage certificate, or to request research material. In the External Affairs division, an interpretation request may occur for a scheduled public program event.

Public programs events are usually held at 31 Chambers Street. In order to ensure interpretation services are available at a scheduled event, the Department will place on its website a statement as follows: "If you require interpretation services, in order to attend a DORIS public program event, please contact our Language Access Coordinator." The statement will have an embedded hyperlink that will provide the person the contact information of the agency's LAC. Interpretation requests must be received at least 3 days prior to a scheduled event. The Department is currently outreaching to DCAS to identify an in-person interpretation service vendor in order to have a contract in place and utilize them as needed.

Researchers and genealogist utilize the Library and Archives division; at this time, no documents or forms have been identified for translation. The Department will monitor this provision and adjust as necessary. The Department will review its existing order forms, such as the Birth and Death Certificate Applications, as well as the photo licensing agreement/permission to publish forms to ensure they are following Plain Language Principles. If a future need arises for document translation, then the Department will utilize a DCAS vendor to provide those services. Language bank volunteers will

review translated materials and provide feedback to the contracted vendor. The Language Access Coordinator will maintain the list of all translated documents and update the list as necessary.

The Department's website averages about 900,000 page views per year. There are links on the agency's home page, which allow visitors to translate the entire website content into over 100 languages. This translation method is currently the citywide standard set by DOITT. The Department will look to the Mayor's Office of Immigrant Affairs and DOITT for any guidance regarding this issue and will adhere to citywide standards.

The agency has developed a Continuity of Operations Plan to respond in case of an emergency. The Department's Continuity of Operation Plan has identified its essential service: to "Provide & Maintain Record Access & Retrieval for the City of New York and the Public." As such, telephonic interpretation services will be available via a wireless telephone service in the event that landlines are not operational or in the event of a need to relocate to an alternative facility. In addition, staff from the agency's volunteer language bank may/shall also be available to assist emergency LEP needs.

V. Training

All front line workers and supervisors in the Municipal Library, Municipal Archives and External Affairs divisions will be required to attend a training on the Departments language access policies and procedures as set forth in the Language Access Plan. All staff attending the training will be required to sign a training attendance sheet. The agency will review and amend existing language access policy/procedures to ensure they are up to date and incorporate them into the training agenda.

Some areas of training will cover: ensuring that the Free Interpretation Services poster are always visibly posted, identifying the primary language spoken by the patron using the "Language Identifications" tools, documenting requests for interpretation services, etc. The training will also cover how to contact the telephone interpretation contracted vendor when a patron needs this service, and how to handle and record language access complaints. The Department will incorporate cultural competency training as part of the agencies EEO training curriculum.

The LAC will maintain a list of all staff who have attended the training and report on this in the annual LL30 report.

VI. Record Keeping and Evaluation

The LAC will create a monthly data-tracking log to gather data information on language access services requests. The agency front line staff will use this data-tracking log to record the number of patrons who required these services. The Municipal Library, Municipal Archives and the External Affairs division, will record requests for language services and at the end of the month; they will submit the log to the agency's LAC. The LAC will review these monthly logs and maintain all data supplied by the divisions that use interpretation services as well as all reports supplied by contracted vendors.

All divisions will be expected to follow the Plan in order to comply with local law 30. The LAC may conduct spot checks of the divisions that use interpretation services by calling or having someone come in who will identify themselves as not being English proficient. If a staff member is not following the agency's Plan, additional training can be provided to the individual staff member or the entire division.

VII. Resource Analysis and Planning

The department may use a MWBE vendor for document translation if needed and will utilize VOIANCE, a DCAS approved vendor for its telephonic interpretation services. The Department is in the process of identifying a DCAS vendor for in-person interpretation services, which may be used at public program events. The LAC will coordinate the staff training; maintain data regarding language access services; respond to 311 language access complaints and issue reports to the Divisions and Commissioner regarding language access issues.

The department has created a volunteer language bank. This language bank will be updated regularly to bring in new volunteers and new languages. The language bank currently can offer the following languages: Spanish, Cantonese, Italian, French, French Creole, Russian, Gujarati, Punjabi and Hindi.

Because DORIS is a small agency with a limited budget to implement this plan we will reach out to other city agencies and identify other resources available throughout the City. We will review other agencies' best practices and incorporate those practices into our plan.

VIII. Outreach and Public Awareness of Language Access Services

To ensure the public is aware of the availability of the department's language assistance services, such as the free interpretation services, the department

will embark on a public awareness campaign utilizing printed materials as well as web and social media channels.

The department will prominently display posters stating the availability of free interpretation services at locations used by the public.

Website: The agency will post on its homepage the availability of free interpretation services. It will also place the updated language access plan on its website.

Social Media: Using its social media platforms i.e. Twitter, Facebook, and Instagram the agency will post on a regular basis the availability of free interpretation services.

IX. Language Access Complaints

To ensure language access complaints are answered and resolved in a timely manner, the agency will: include a module in our annual staff training; monitor language access complaints received through 311 and through its internal complaint process; and appoint a language access coordinator responsible for receiving, tracking and answering complaints.

Staff Training: How to handle and record complaints regarding interpretation services will be part of the staff training and development process. Staff training will focus on utilizing a customer service based approach in which the front line staff can resolve problems in a manner that allows patrons to satisfactorily receive requested services. If the front line staff is unable to resolve the issue immediately, then they will seek assistance from their direct supervisor. If the issue cannot be resolved at that time, agency staff will inform the patron that they can file a complaint either by calling 311 or filling out a written complaint form.

In the 2017 Mayor's Customers Observing and Reporting Experience (CORE) Results, the Department received a 100% overall score because the divisions providing language access services, were evaluated and found to be accessible to LEP customers.

Informing Patrons of Free Translation and Interpretation Services: The agency has received the "You Have the Right to Free Interpretation" poster from the Mayor's Office of Immigrant Affairs, the poster will be displayed in public areas.

Tracking Complaints/Maintaining Records: The LAC will receive complaints made through 311 and through its own internal complaint process. The

coordinator will log the complaints into a central complaint file and will be tasked to investigate the complaint and respond accordingly.

Reporting Language Access Complaints: The LAC will compile all language access complaints on a monthly basis and generate a quarterly report.

Annual Reporting: The LAC will issue an annual agency language access complaint report.

X. Implementation Plan Logistics

Identifying the Language Access Coordinator

The Commissioner of the Department of Records & Information Services has appointed the Special Assistant to the Commissioner as the agency's Language Access Coordinator. The Language Access Coordinator's responsibilities are to:

- Update and maintain the agency Volunteer Language Bank database.
- Schedule training to ensure that agency staff is prepared to provide language assistance upon request. Provide support and guidance to agency personnel regarding the language access services offered at the agency whether through contracted interpreters or onsite volunteer interpreters
- Periodically review needs and update as necessary agency's documents/forms for translation.
- Receive and respond to all language access complaints.
- Develop and maintain statistical information relating to the agency Language Access Plan.
- Develop a process for providing implementation updates as part of the agency's annual reporting requirements. Issue quarterly reports and annual reports.
- Develop a process to determine when to revise the plan.

Updating Language Access Plan Logistics

- April 2018 - The Language Access Coordinator at DORIS will update the existing language access plan and submit a draft to the Mayor's Office of Immigrant Affairs by the end of the month.
- April 2018 – Evaluate whether to utilize MWBE certified Language Access vendors for document translation and in-person interpretation services or utilize a DCAS approved vendor.
- May 2018 – Schedule Staff meetings with the Municipal Archives, Municipal Library, and External Affairs to begin to familiarize them with

- Local Law 30 and the agency's revised language access plan.
- June 2018 - Hold training for all staff, which have direct access to the public on the agency language access plan and on contracted vendor services.
 - May 2018 - Evaluate feasibility of language access option on agency phone system.

Major Milestones

- May 2018 - Update the agency employee volunteer Language Bank.
- May 2018 - Update Language Access Vendor Contracts.
- May 2018 - Develop language access policy/procedures.
- May 2018 - Meeting with agency staff to familiarize them with Local Law 30 and the updated language access plan - Divisions affected are the Municipal Archives, Municipal Library and External Affairs.
- June 2018 - Training staff on Language Access Services.
- Ongoing - The Language Access Coordinator will provide implementation updates through the quarterly report to the Commissioner and to the Division Directors. The quarterly report will include information such as complaints received via 311 and internally, along with milestones achieved.
- Ongoing - During the quarterly meetings, the language access coordinator, along with Division Directors, will have an opportunity to review the need to make modifications and/or update areas of the language access plan.