

The following document outlines SBS' Language Access Implementation Plan for Local Law 30

I. Name and title of Language Access Coordinator

- a. Department of Small Business Services
- b. Michael Silver, Senior Policy Advisor
- c. <https://www1.nyc.gov/site/sbs/about/language-access-plan.page>

II. Agency mission and background

The Department of Small Business Services (SBS) helps unlock economic potential and create economic security for all New Yorkers by connecting New Yorkers to good jobs, creating stronger businesses, and building vibrant neighborhoods across the five boroughs.

We are focused on equity of opportunity that leads to economic self-sufficiency and mobility.

The agency interacts with the public in a variety of ways directly and through contracted vendors including:

Careers

We prepare and help New Yorkers to find jobs and help businesses find the talent they need by:

- Developing job search skills through resume and interviewing workshops
- Training local residents to acquire skills in growing fields
- Connecting jobseekers to employers with open positions
- The Workforce1 Career Centers interact with the highest volume of individuals served by the agency. These customers are seeking jobs or job-related services such as training, career-advisement, workshops, and job search-related supports.

Businesses

We help businesses start, operate, and grow in New York City by:

- Helping minority and women-owned businesses (M/WBEs) get City-certified and compete for contracts
- Connecting entrepreneurs to free resources ranging from business courses to legal services
- Explaining government rules and regulations
- Helping entrepreneurs apply for funding to launch or grow a business
- The NYC Business Solutions Centers are second in the volume of individuals accessing SBS services and in the amount of one-on-one support and interactions customers require. NYC Business Solutions assist entrepreneurs starting businesses, customers who often need more intensive support than established businesses and have fewer resources that they can draw upon internally.
- M/WBE, LBE and EBE Certification & Related Services provide access and support for business that aim to bid for and obtain City contracts; therefore it is essential that access to this program be available to LEP individuals. The additional programs and services listed serve increasingly larger and/or well-established businesses rather than individuals; or their services have, as an objective, improvements in customer-produced output that are English-only in nature; in this case, capitalizing on City, State and Federal Government contracting opportunities, which require that proposals be submitted in English

Neighborhoods

We work with community-based organizations to build vibrant neighborhoods where New Yorkers can shop, work, and live by:

- Overseeing the largest network of Business Improvement Districts (BIDs) in the country, which delivers more than \$134 million in additional services throughout the five boroughs

- Offering training, tools, and one-on-one assistance to local community-based organizations
- Administering grant programs to strengthen and revitalize commercial districts
- Working with community partners to identify local commercial district needs and plan targeted solutions

III. Agency language access policy and goals

SBS' policy and goal is to obtain the highest possible quality of customer service, adhering to the spirit and the letter of Local Law 30, with the highest degree of operational flexibility and the lowest possible ongoing cost of operations. Given SBS' presence in neighborhoods across the city and the proportion of Limited English Proficiency (LEP) persons in New York City, we must ensure that they can access our services despite language barriers. We will have successfully implemented our plan when providing LEP supports alongside English language offerings will be the new operating normal at SBS. We plan to measure and evaluate our progress to ensure that we are successful, as described in subsequent sections of this Language Access Plan.

To deliver on these goals, each division at SBS has a lead Language Access Coordinator who is responsible to interfacing directly with program managers within the division. The Language Access Coordinators will ensure that relevant staff within each division is fully aware of SBS' language access policies and procedures.

IV. Agency language access accomplishments and progress on goals from previous LAIP

Goal	Update
Establish budgets by division for contracted vendors	Complete July 2020
Re-train lead divisional Language Access (LA) leads, ensure role and responsibility is clear	Complete December 2020
Establish backup divisional Language Access personnel (to act in the role when LA lead is absent)	Complete December 2020
Train the backup personnel	Complete January 2021
Finalize and share LL 30 guidance, best practices and operations for using contracted vendors for LA leads and back ups	Complete February 2021
Assess most commonly distributed documents	Complete April 2021
Translate those documents that meet threshold for most common	Ongoing

V. LEP population assessment

The SBS plan incorporates the following analysis which is a combination of the Four Factor Analysis and data collected from services provided from the agency.

1. Department of Justice Factor 1: Number/Proportion of LEP population

Using NYC Population Fact Finder we can isolate the universe of New Yorkers in need of language access. At the broadest level 49% of New Yorkers above the age of five and 23% are considered limited English proficient (LEP), meaning that they self-identify as speaking English “less than very well” or about 1.8 million people.

Source: [NYC Population FactFinder](#)

Local Law 30 are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish

2. Department of Justice Factor 2: The frequency with which LEP individuals come in contact with the program

SBS serves only an adult population. Again, using NYC Population Fact Finder, it is estimated that the relevant universe of LEP adults is approximately 75% of the 1.8 million mentioned or 1.2 – 1.3 million New Yorkers.

Source: [NYC Population FactFinder](#)

In addition, after evaluating the customer requests from across the agency and in accordance with LL30 we have determined the top ten languages most requested within our customer base in order of frequency are as follows:

- Spanish
- Russian
- Mandarin-Chinese
- Cantonese-Chinese
- Korean
- Haitian (French) Creole
- Fujianese-Chinese (Fuzhou)
- French
- Polish
- Bengali

3. Department of Justice Factor 3: The nature and importance of the program, activity, or service provided by the program

SBS has created Language Access Plan “Snapshots” for each of the Program Divisions and services outlined in the Agency Mission and Background section, with service-specific analysis as to LEP supports available, linguistic profile analyses performed, Essential Public Documents inventoried, etc. The Language Access Plan “Snapshots” allowed us to rank agency’s services according to priority level for implementation of the Language Access Plan. SBS’ Language Access Plan was built from these service-specific analyses, so that we can implement it in a targeted and effective way, understanding the baseline we have to work with and the service structure and constraints for each of the agency’s services.

More specifically SBS has LEP language support request tracking in place at all walk-in facilities where we serve adults including the Workforce1 Career Centers and at NYC Business Solutions Centers. There is a regular influx of LEP persons into all our walk-in facilities. In addition, for all public facing programming services have access to telephonic interpretation. As appropriate marketing and published materials are translated into the aforementioned languages.

4. Department of Justice Factor 4: Resources available to the Agency

- SBS Staff Foreign Language Skill Locator tool – internal database, searchable and accessible via SBS' intranet, that contains foreign language skills and proficiency levels of SBS staff
- Walk-in facilities' staff existing foreign language skills
- Signage and "I Speak" cards
- City-wide Volunteer Language Bank
- Vendor contracts for phone interpretation, in-person interpretation, and document translation
- Budgets dedicated by each division to accompany the contracted services established each year based on projected needs
 - In FY21 the SBS budget for these contracted vendors exceeded \$80,000

Evaluation of language access needs of agency's service population:

As indicated in the evaluation in factor 2, SBS has incorporated customer requests as additional data sources to evaluate the language access needs of the service population. SBS will continue to work with each division to assess their respective engagement with New Yorkers and small business owners with Limited English Proficiency.

Provision of language access services

In general, SBS provides language access in the three following ways. Please see below for additional details and processes.

- Signage at Public Service Locations
 - SBS will ensure that appropriate signage has been installed in all center locations serving the public
 - If any new centers are opened in the five boroughs programs will be required to ensure proper signage at all locations.
- Interpretation Services
 - SBS has access to a Telephone Interpretation Vendor: Voiance is the current phone interpretation provider when a staff member is not available.
 - In-Person Interpretation Vendor: When holding community meetings, press events, and other larger scale in-person interactions, we rely on both bilingual staff and an in-person interpreter provided by our vendor, Geneva Worldwide.
- Translation of Written Material
 - Essential Public Documents: This is an ongoing need as our services and programs evolve to meet the needs of the market and community. As new programs are developed we ensure that translation are happening appropriately.
 - Marketing Materials/Notice of Services Provided: This is an ongoing need as our services evolve to meet the needs of the market and community.
- Contracted Vendors
 - SBS delivers services through contracted vendors in many cases, most notably through the Workforce1 Career Centers (jobseekers) and NYC Business Solutions Centers (small businesses).
 - All the resources and tools listed above are available to ensure the provision of services can be delivered to LEP persons through these vendors at walk in locations. The lead Language Access coordinator for each division is responsible to for ensuring vendors are equipped and using these tools.
 - In addition, SBS has requested that contracted vendors recruit and hire bilingual staff at the walk-in centers to meet the needs of the community in which they serve. We see this

request as incremental to the basic service provision delivered primarily through contracted language access vendors and therefore an opportunity to help our vendors reflect the communities they serve.

Translation:

- Each division in the agency has identified the most commonly distributed collateral by volume and has prioritized translation of these by the frequency of need in languages other than English. All documents and the translated versions are available for download and use on SBS' internal web.
- The identification of essential public documents for translation as well as marketing materials will be an ongoing need as our services evolve to meet the needs of the market and communities served.
- As an example of translated documents, collateral used by SBS' Compliance Advisors for businesses in retail, food service, and personal care have each been translated into 10 languages based on the population of business owner's languages spoken.
- Other divisions have prioritized documents for translation in a similar fashion.
- For new translations, the agency has a process outlined below for the additional documents to be converted into other languages:
 - Through the division's Language Access Coordinator, SBS staff will work with the Communications team to identify outreach purpose, the intended target audience and define how the document will be distributed.
 - Define the following items for all documents, posts, or presentations to be translated
 - SBS Division or Center requesting translation
 - From which language(s) to which language(s)
 - Deadline or due date for finished product
 - Number of words to be translated
 - Incorporation of the principles of plain language using guidance from the Mayor's Office of Adult Education/Mayor's Office of Immigrant Affairs publication on Easy-to-Read NYC Guidelines for Clear and Effective Communication and <https://www.plainlanguage.gov/>

Interpretation:

- SBS provides different options for assisting customers who are limited English proficient including resources primarily through contracted vendors. In addition the SBS Language Bank and the Citywide Volunteer Language Bank is available. Below are the three ways customers can be assisted:
- For walk-in customers at center locations:
 1. Customer indicates his or her preferred language from the *Free Interpretation Service Available* poster. If the preferred language is not available on the poster, please call our telephonic interpretation vendor.
 2. Once the preferred language has been indicated, complete an I Speak card on the customer's behalf. The customer should carry the I Speak card with him/her and show it at any New York City government agency.
 3. All assistance communicating with customers will occur through the use of telephonic interpretation
- For services delivered via telephone, including our Business Restart Hotline, the use of telephonic interpretation is available to all staff to ensure communication with business owners with LEP.
- For In-Person Interpretation: Professional interpreters are available through our vendor Geneva. Teams seeking interpretation should complete the request form and email the completed form and anything that will help provide context like a presentation, brochure, flyer, to the division's dedicated Language Access Coordinator.
 - These services are available to be delivered virtually as well.

Emergency Preparedness and Response:

SBS has incorporated Emergency Preparedness Plan to ensure that customers who are limited English proficient are able to access language services during an emergency. This plan includes ensuring that documents are translated and signage in public locations is conspicuous, appropriate multilingual signage and LEP identification tools are available at emergency sites, interpreters can be contacted and utilized, and other translation resources and vendors are available in the event of an emergency.

SBS's contracts with vendors provides for rapid fast turnaround of translations. For written translations, we have established protocols for expedited service with the vendor which has worked well. In addition, the SBS Website and NYC Business (which SBS helps operate) has the most commonly delivered services and request available in 10 languages so information can be disseminated digitally. SBS commonly works with ethnic media outlets to announce programming and to the local community in the preferred languages.

VI. Training

Agency Staff: Each division at SBS has a lead Language Access Coordinator who is responsible to interfacing directly with program managers within the division. The Language Access Coordinators will ensure that relevant staff within each division is fully aware of SBS' language access policies and procedures and can deliver services to all constituents including those with Limited English Proficiency. The divisional Language Access Coordinators are also responsible for setting a divisional budget for each contracted vendor for Language Access. Finally in order to ensure continuity of service without interruption a backup for each division has been assigned and trained.

The Language Access Coordinator will conduct trainings minimally once each year with the relevant staff within the division and as needed ad hoc training can be provided to new staff as they are on-boarded. Relevant staff will include any individuals overseeing programming or contracts with vendors that provide direct services to the public. Aside from SBS and City policy and standard procedures, training will include topics such as City demographics, resources to evaluate the demographics for targeted populations or geographies, historical data on programs to inform the best approach to ensure access is readily available. All trainees will be made aware of the internal web that SBS provides to allow for individuals to self-serve and have access to all language access resources. These include the following resources, among others:

- "I Speak" cards and "Free Interpretation" posters to download
- SBS Language Bank
- City Language Bank
- How to access professional interpretation and translation services
- Walk-In Center Resources
- Mayor's Office of Adult Education/Mayor's Office of Immigrant Affairs publication on Easy-to-Read NYC Guidelines for Clear and Effective Communication and
<https://www.plainlanguage.gov/>

The SBS Language Access Plan primary contact will ensure that Language Access Coordinators have the materials and resources needed and will join trainings as necessary, and that trainings are happening as planned.

Vendor Staff: For divisions at SBS that have contracted vendors that provide services, the Language Access Coordinator will ensure that with program managers within the division who manage these contracts are fully. As necessary the Language Access Coordinators will provide training to vendor staff on SBS' language access policies and procedures.

VII. Record keeping and evaluation

SBS will track services and maintain records of language services with its various Customer Relationship Management (CRM) tools which vary by program and division.

In addition, SBS will maintain a log of all translation and interpretation services utilized. 311 inquiries for Language Access will be tracked and logged with SBS' internal database for all 311 inquiries. Complaints submitted electronically will be tracked and logged with the appropriate CRM system.

Each division will perform a

1. Periodic examination of demographics data of customers served; as gaps in service and need are identified, use data to determine how additional services should be provided in new languages or documents require translation
2. Annual evaluation of complaints submitted to agency and determination if systematic action is required

VIII. Resource analysis and planning

SBS will leverage the following structure and resources to implement the language access plan.

- Organizational structure with lead Language Access Coordinator who is responsible for ensuring each division implementation of the plan
- Telephonic Interpretation: Language Line
- Document translation: Geneva Worldwide
- In Person Interpretation: Geneva Worldwide
- SBS Language Bank: Database of SBS employees and proficiency with various languages who have agreed to help review documents and provide services
- Citywide Language Bank: Database of City employees and proficiency with various languages
- SBS' marketing and communications team for design and layout of collateral
- Various customer relationship management (CRM)
- SBS communications and marketing personnel

In order to identify and close gaps in access in service, SBS will follow this protocol:

SBS will continue to work towards the delivery of quality language assistance services. In order to continually improve, SBS will take the following steps:

1. Evaluate the vendor performance annually and ad hoc as inquiries and complaints necessitate.
2. Provide additional ad hoc training as needed for SBS staff and/or contracted service vendors requiring additional assistance understanding
3. As mentioned previously, the work that will be done in the summer to evaluate language access at our physical locations will inform our work and provision of language access.

IX. Outreach and public awareness of language access services

SBS provides services in multiple languages at its Workforce1 Career Centers located across NYC for jobseekers, and 7 NYC Business Solutions Centers for entrepreneurs. SBS also promotes programs for entrepreneurs and jobseekers in multiple languages across various SBS platforms:

- Social media channels including Twitter and Facebook
- Direct email marketing
- Advertising in ethnic media publications (as resources allow)
- Printed marketing materials

- Website

SBS also works directly with ethnic press to promote services that are available in multiple languages.

X. Language Access complaints

SBS will monitor and respond to all public complaints about Language Access through both 311 and any other inquiries through its website via “contact us” portals within 3 business days.

Inquiries and complaints about Language Access will be received depending on the methodology of the inquiry or complaint. For calls via 311, SBS will receive the inquiry via email from 311Agency Analyst which will be directed to the Language Access Coordinator overseeing the program or initiative in question and will work with program teams to address the issue. For inquiries submitted electronically, division Language Access Coordinators will be notified and will work with program teams to address the query.

311 inquiries for Language Access will be tracked and logged with the appropriate CRM system, ultimately with the single solution.

All inquiries will be reported annually.

XI. Implementation plan logistics

The SBS implementation plan logistics are outlined in the table below:

Language access goal	Milestones	Responsible staff	Deadline
Identify any most commonly distributed documents not yet translated	Each division LA Coordinator to identify	SBS Language Access Coordinator and Communications team	June 2021
Translate any essential documents not yet translated		SBS Language Access Coordinator and Division Language Access Coordinators	August 2021
Establish budgets for FY22		SBS Language Access Coordinator and Division Language Access Coordinators	July 2021
Establish training dates for each division	Each division to set schedule	SBS Language Access Coordinator and Division Language Access Coordinators	July 2021
Plan for the promotion of multilingual material to ensure that people and businesses can find information and services readily		SBS Language Access Coordinator and Division Language Access Coordinators and Communications Dept	September 2021

Complete annual training for each divisions	By the end of each Fiscal Year	SBS Language Access Coordinator and Division Language Access Coordinators	October 2021
Evaluation of vendors and services		SBS Language Access Coordinator, Division Language Access Coordinators, vendors	October 2021
New programs and most commonly distributed documents translated	As new programming is established, funded, and launched	Division Language Access Coordinators and Communications team	Ongoing