



## **Language Access Implementation Plan**

The Language Access Implementation Plan explains how the agency will provide services to people who have limited English proficiency (or LEP).

Agency name: LAW


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Published Date: June 7, 2024


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June 07, 2024  
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The Language Access Coordinators for the New York City Law Department are Karlyne Fequiere, Chief Diversity, M/WBE & Equal Employment Opportunity (EEO) Officer, and Celina K. Fletcher-Serrant, Diversity Training Liaison and Assistant EEO Officer.

The rich diversity of New York City renders multilingual communication essential to the administration of justice, effective delivery of services, and equitable public engagement. Local Law 30 and language access are key components to ensuring all New Yorkers, regardless of their native language, have access to the vital information and services the city provides.

This document, the *Law Department Language Access Implementation Plan (LAIP)*, addresses Local Law 30 (which supersedes Executive Order 120), and outlines how the Law Department will meaningfully serve individuals with limited English proficiency (LEP). As the City's population evolves and diversifies, the Law Department will periodically review the plan to ensure it supports the changing needs of the City and advances language access for all New Yorkers.

For more information on the Law Department's Language Access Implementation Plan follow this link to the agency's website:

<https://www1.nyc.gov/site/law/about/language-access-plan.page>

## Section 1. Agency mission and services

The New York City Law Department is one of the oldest, largest, and most dynamic law offices in the world, ranking among the top largest law offices in New York City, and one of the largest public law offices in the country. Tracing its roots back to the 1600s, the Department has an active caseload of approximately 70,000 matters and transactions in 18 legal divisions.

The Corporation Counsel heads the Law Department and acts as legal counsel for the Mayor, elected officials, the City, and all its agencies. The Law Department represents the City, the Mayor, other elected officials, and the City's many agencies in all affirmative and defensive civil litigation as well as in juvenile delinquency proceedings brought in Family Court, and Administrative Code enforcement proceedings brought in Criminal Court.

The Law Department's mission is to provide legal representation to the City of New York in the tradition of excellence and dedication, and in furtherance of the operation of its government. Attorneys and support professionals work to seek justice while providing the City with the highest quality legal representation. The Corporation Counsel for the City of New York has a special responsibility for the pursuit of justice, while serving the long-term institutional interests of the City. Justice is demonstrated, not only in the manner in which the agency advocates and advises clients, but also in how the Law Department's operations are managed.

The Law Department's external legal work and internal work environment must continue to reflect the agency's core values: *Excellence., Justice, Dedication, Teamwork, Respect, Supportive Work Environment, Professional Development, Diversity, and Integrity.* The Law Department is committed to ensuring that the agency provides equal access to services and continuously improves language access for members of the public with limited English proficiency.

The Law Department interacts with the public in a variety of ways but most frequently, through our Family Court Division and Administrative and Regulatory practice areas.

### A. Family Court Division

The Family Court Division promotes the well-being and best-interest of the City's children and families that, for various reasons, find themselves within the Family Court system while balancing the need to protect the public.

The Family Court Division consists of two units. The *Interstate Child Support Unit* primarily handles child support petitions filed under the Uniform Interstate Family Support Act (UIFSA) by out-of-state jurisdictions or custodial parents residing in other states, U.S. Commonwealths, and several foreign countries. Staff also assist many City residents in obtaining parentage and child support orders. In this respect, custodial parents residing in the New York City area obtain referrals from the Office of Child Support Services (OCSS) and schedule intake appointments, which are available in-person and virtually, to obtain information and provide documents to out-of-state jurisdictions to acquire one or more of the following: Orders of parentage, child support orders, upward or downward modifications of child support orders, orders to enforce already-existing orders of support, or orders to register out-of-state orders of support.

The *Juvenile Delinquency Prosecution Unit* investigates and, where appropriate, prosecutes juvenile delinquency matters that are referred to our office or removed from the Youth Part to the office. Juvenile delinquency matters involve youth ages 7 to 17 who have been arrested for conduct that would constitute a crime if they were adults. In prosecuting juvenile delinquency matters, staff interact with the public by way of interviews and communication with complainants, witnesses, police officers, etc. The Family Court Division's Juvenile Delinquency Prosecution Unit seeks to ensure that youth who commit delinquent acts are held accountable for their misconduct and receive appropriate services.

The Family Court system is focused on rehabilitation. The Law Department seeks to balance the need for protection of the community with the needs and best interests of the youth. The Division's work also includes providing information to victims of youth crime on available community-based services, including counseling, crisis intervention, and safety planning.

Community outreach and engagement are crucial elements to the Family Court Division's ability to serve the vast and diverse communities within the City. Division staff are actively engaged in outreach activities and the limited direct services provided to court participants at Division Offices.

#### **B. Administrative and Regulatory Law Division**

The Law Department's Administrative and Regulatory Law Division defends the City in lawsuits challenging the validity of its regulatory laws, and the policies and decisions of the administrative agencies charged with carrying them out. Division attorneys also bring civil actions and criminal proceedings against individuals and corporations that violate the City's regulatory requirements.

Public interaction includes the Division's work with street vendors seeking to reclaim property seized by the NYPD for forfeiture, and complainants in unlawful eviction proceedings who serve as witnesses in Administrative Code prosecutions. In these limited contexts, over-the-phone interpretation services are available via *Voiance*. Additionally, "I Speak" cards will be made available and Division staff will have refresher training on how to access OTP interpretation.

#### **C. Tort Division**

The Tort Division, the Law Department's largest division, functions as the City's lawyer for a myriad of personal injury and property damage suits brought against it each year. The City is like no other litigant, for no ordinary defendant confronts liability over so broad a spectrum of activities: the City provides housing, education, childcare, firefighting, sidewalks, roadways, recreational facilities and emergency and other medical services. Further, because the truly negligent party is often uninsured, the City is frequently brought in as the "deep pocket defendant." As such, it is uniquely vulnerable to suit. The City "owns" 6,374 miles of streets and approximately 12,750 total miles of sidewalk. Therefore, it not surprising that a substantial percentage of City tort suits arise from injuries allegedly caused by cracked sidewalks, potholes, or pavement obstructions.

Like other litigating divisions such as General Litigation and Special Federal Litigation, the Tort Division interacts with the public in the courtroom setting whereby the courts provide interpretation services, if needed. Another capacity in which the Tort Division interfaces the public is during depositions. Specifically, the pre-trial lawyers conduct depositions and are responsible for securing interpreter services for plaintiffs with limited English proficiency.



## Section 2. Agency language access policy

The overall goal of the Law Department’s Language Access Implementation Plan (LAIP) is to provide high-quality language access services enabling persons with limited English proficiency to experience *meaningful* access to the information the agency provides. One aspect of this goal is to provide a welcoming environment to individuals with limited English proficiency, including an environment that makes it easy for employees to communicate with members of the public who are entitled to language access services.

Pursuant to the LAIP, the Law Department provides an array of free interpretation and translation services and will seek to actively publicize and advertise these services. The Law Department will ensure that documents most commonly distributed to the public are translated into the 10 designated citywide languages: *Spanish, Chinese, Russian, Bangla, Haitian-Creole, Korean, Arabic, Urdu, French and Polish.*

The Law Department aims to provide more seamless communication with members of the public entitled to language access services. To support the overarching goals of the LAIP, the Law Department is enhancing the languages access programming to strengthen the agency’s infrastructure and capacity to provide a full cadre of language access services. These enhancements include: new policies and procedures; agency-wide and title-specific training; increased use of signage and other public awareness resources; and formal evaluation, tracking and monitoring processes. These components and timelines are described in the relevant sections of this LAIP.

The Law Department is in the process of updating its Office Manual to address Language Access and include the following notice to all agency employees of the following:

- Law Department employees may not discriminate, restrict or deny services or benefits based on an individual’s preferred language or limited English language proficiency.
- Law Department staff are required to work with members of the public in their preferred language.

- Individuals with limited English language proficiency must be offered immediate, free, and confidential language services.
- Staff should note individual's preferred language in the physical and electronic case files, when applicable.
- Language services can be provided using professional interpretation services, including telephonic interpretation services.
- Individuals under the age of 18 are not allowed to provide interpretation services.
- Employees may not ask other members of the public to provide interpretation services.
- Employees can access telephonic interpretation services, in-person interpretation services and sign language interpretation services twenty-four (24) hours per day, seven (7) days per week.
- Employees may contact the Law Department's Language Access Coordinators or the Mayor's Office of Immigrant Affairs (MOIA) for additional support and guidance on any language access-related issues.

The Language Access Coordinators work with the agency's Disability Service Facilitators to identify areas to align language access policy with LL12 Disability Access Plans. All aforementioned roles are borne out of the agency's Equal Employment Opportunity (EEO) Office which contributes to a seamless collaboration.

Consistent with these core values and with the purpose of Local Law 12 of 2023, the Law Department will use reasonable efforts to identify, prevent, and remove barriers to accessibility. The New York City Law Department is committed to providing physical, digital and programmatic access, and effective communications to persons with disabilities. Its five-year accessibility plan outlines our efforts to improve accessibility in a manner that promotes equal access to our services and programs for persons with disabilities. The plan seeks to improve accessibility through the following:

1. **Effective Communication** – Providing accessible documents, interpretation services, assistive listening devices, and captioning/transcription services.
2. **Programmatic Access** – Conducting self-evaluations, provide communication services and assistive technology as needed, and implement disability awareness training.
3. **Workplace Inclusion** – Continuing to adhere to the City's reasonable accommodation and EEO policies.
4. **Accessible Documents and Forms** – The Law Department will strive to ensure that documents, presentations, reports, and handouts, are available in accessible formats, including but not limited to providing documents in large print, high contrast, electronic, or braille formats.
5. **Sign Language Interpretation:** When requested, the Law Department will provide sign language interpretation services, including having qualified interpreters available during meetings, presentations, and important discussions.

6. **Assistive Listening Devices:** When requested, provide assistive listening devices like personal amplifiers or audio induction loop systems. A list of assistive listening devices currently available at the Law Department can be found at MOPD's website at <https://www.nyc.gov/site/mopd/laws/nyc-locations-with-assistive-listening-systems.page>
7. **Captioning and Transcription Services:** When requested, offer real-time captioning or transcription services through live captioning services or by making transcripts available.
8. **Communication Access Realtime Translation (CART):** Provide CART services, via a trained provider, transcribing written text in real-time, when requested.
9. **Training for Staff:** The Law Department will seek to train employees on effective communication techniques when interacting with persons with diverse disabilities.

This plan was developed as a result of a preliminary self-evaluation, conducted by a working group of Law Department employees, which identified several potential barriers. It is through these self-evaluations and the public comment process that the Law Department expects the five-year accessibility plan to evolve and more adequately promote accessibility to our programs and services. We will continue to conduct regular self-evaluations in all areas required by Local Law 12.

### Section 3. Language access needs assessment

The Law Department uses the Department of Justice's Four-Factor Analysis as a guide to evaluate the LEP populations served by the agency. The Law Department reviewed tracking data from *Voiance* to determine which languages were most frequently requested by individuals with limited English proficiency. The most frequently requested languages at Law Department are *English, Spanish, Mandarin, Bangla, Cantonese, and Russian.*

#### Limited English Proficiency Population Assessment

*Factor 1: Examine the number of people with limited English proficiency in the eligible service population*

The Law Department's eligible service population is defined as New York City, broken down by county to correspond with the agency's service for residents in each of the five boroughs. According to data obtained from the U.S. Census Bureau's 2022 American Community Survey 1-Year Estimates, the total population of New York City is 8,335,897 people. Of that population, 22.7% (1,892,249 people) are persons with limited English proficiency, i.e. spoke English less than "very well."<sup>1</sup>

<sup>1</sup> <https://data.census.gov/table/ACSSPP1Y2022.S0201?t=001&g=160XX00US3651000&y=2022>



*Factor 2: Examine the frequency with which people with limited English proficiency come into contact with the agency*

**In CY 2023, the Law Department provided over the phone interpretation through *Voiance* 1,613 times. Spanish comprised 77.2% percent of telephonic interpretation sessions followed by Mandarin (8.9%), Bangla (2.5%), Cantonese (2%), Russian (1.9%), French (0.9%), and Haitian-Creole and Arabic (both tied at 0.8% each). The Family Court Division accounted for the vast majority of the requests. The detailed quantities and durations in minutes are denoted below.**

LANG	QTY per Lang	% per Lang
Spanish	1,246	77.2%
Mandarin	144	8.9%
Bangla	40	2.5%
Cantonese	33	2.0%
Russian	30	1.9%
French	15	0.9%
Haitian Creole	13	0.8%
Arabic	13	0.8%
Tamil	11	0.7%
Urdu	8	0.5%
Turkish	6	0.4%
Hindi	6	0.4%
Mandingo	6	0.4%
Korean	5	0.3%
Uzbek	4	0.2%
Punjabi	4	0.2%
Hausa	4	0.2%
Twi	3	0.2%
Italian	3	0.2%

Fuzhou	3	0.2%
Wolof	2	0.1%
Ukrainian	2	0.1%
Moroccan Arabic	2	0.1%
Thai	2	0.1%
Fulani	2	0.1%
Bambara	1	0.1%
Albanian	1	0.1%
Yemeni Arabic	1	0.1%
Romanian	1	0.1%
Croatian	1	0.1%
Fukienese	1	0.1%

LANG	DURATION (minutes) per Lang	% per Lang
Spanish	18,267	77.60%
Mandarin	1,991	8.50%
Bangla	635	2.70%
Cantonese	490	2.10%
Russian	397	1.70%
Arabic	227	1.00%
Haitian Creole	205	0.90%
French	184	0.80%
Tamil	148	0.60%
Turkish	143	0.60%
Hindi	126	0.50%
Uzbek	112	0.50%
Mandingo	97	0.40%
Urdu	81	0.30%
Punjabi	57	0.20%
Korean	57	0.20%
Italian	46	0.20%
Twi	42	0.20%
Hausa	38	0.20%
Fuzhou	36	0.20%
Moroccan Arabic	33	0.10%
Romanian	30	0.10%
Thai	19	0.10%
Wolof	17	0.10%
Fukienese	16	0.10%
Fulani	11	0.00%
Ukrainian	8	0.00%
Yemeni Arabic	7	0.00%
Croatian	7	0.00%
Bambara	5	0.00%
Albanian	2	0.00%

In CY2023, the Law Department provided in-person interpretation services 883 times. Spanish comprised 63.2 percent of in-person translation sessions followed by Chinese (8.4%), Russian (6.5%), Bangla (3.8%) and Arabic (2.8%). The Family Court Division accounted for 50.9% of the in-person interpretation requests followed by the Tort Division (45.2%).

<b>LANG</b>	<b>% (by Qty)</b>
Spanish	63.20%
Chinese	8.40%
Russian	6.40%
Bangla	3.80%
Arabic	2.80%
Haitian Creole	1.80%
Korean	1.60%
American Sign Language	1.50%
Urdu	1.50%
French	0.70%
Yiddish	0.70%
Punjabi	0.70%
Polish	0.70%
Hindi	0.60%
Wolof / Ouoloff	0.50%
French Creole	0.50%
Nepali	0.50%
Fulani	0.40%
Twi	0.30%
Albanian	0.30%
Tamil (Sri Lankan & Indian)	0.30%
Italian	0.20%
Persian (Farsi)	0.20%
Turkish	0.20%
Fuzhou	0.20%
Uzbek	0.20%
See Special Instructions	0.20%
Georgian	0.20%
Yoruba	0.20%
Thai	0.20%
Kurdish	0.10%
Portuguese	0.10%
Hebrew	0.10%
Hungarian	0.10%
Romanian	0.10%
Indonesian	0.10%
Tibetan	0.10%

*Factor 3: Examine the importance of the benefit, service, information, or encounter to the person with limited English proficiency*

Access to services provided by the Law Department's front-facing divisions is crucial. For example, communication with interstate and international jurisdictions is imperative to obtain orders of financial and medical support for families and children in the City of New York and beyond. Additionally, plaintiffs in Tort cases and pro se criminal defendants in Special Federal Litigation cases have a right to fair and just participation in the judicial process.

*Factor 4: The resources available to the agency and the costs of providing various types of language services*

The Law Department's Operations Division facilitates multiple resources via agreements with vendors (such as contracts, or purchase orders) to provide services in the areas of in-person interpretation, telephonic interpretation, transcription, and translation. For CY 2023, the Operations Division authorized remittance of \$426,261.09 related to language services for in-person interpretation, telephonic interpretation, transcription and translation.

#### **Section 4. Notice of the right to language access services**

The agency's Language Access Coordinators (LACs) will be responsible for plan implementation. The LACs will work with the Executive team, Division Chiefs and other designated staff to ensure the overall success of the plan. The LACs or designee(s) will also regularly liaise with the Mayor's Office of Immigrant Affairs on citywide language access issues and reporting. The Law Department will make the public aware of the plan with the use of signage at points of contact and language access communications on the agency's website.

##### **A. Most Commonly Distributed Documents**

Local Law 30 of 2017 requires that the Law Department identify and translate the documents most commonly distributed (MCD) to the public into the designated citywide languages (DCL).

Each year, the LAC will work with agency staff to identify the MCD documents by first compiling a list of documents that were distributed to the public in the previous year by the Divisions that engage in direct services as contemplated by local law. The LAC will review these documents and determine the top five documents, in terms of the quantities distributed. These documents will be considered the MCD documents and translated into the DCL. Documents designated by the LAC as MCD will be made available in the DCL on the Law Department's website, until they reach the end of their "shelf life."

The Law Department will also identify and translate essential public documents. The Law Department will target documents that provide fundamental information about services offered and how to obtain further assistance. Document translation will adhere to plain language principles and the documents will be available at specified office locations and posted online. The agency will periodically revisit the list to ensure the individuals entitled to language access services have adequate access to Law Department functions and direct services.

## **Outreach and Public Awareness of Language Access Services**

The Language Access Coordinators work with designated staff at all Law Department locations that receive members of the public to ensure that required signage is displayed. The Language Access Coordinators also ensure that Division offices have “I speak” cards or similar tools to place in public areas.

The Family Court Division staff participating in outreach activity are committed to providing presentations to local communities, many of which have individuals with limited English proficiency. Before each presentation, the community outreach coordinator requests the assistance of the host entity to identify any potential need for interpretation services and ensure services are available. If the need arises, these events are typically covered with interpreters from a contracted vendor secured by the host entity.

The Family Court Division facilitates presentations and tabling throughout the five boroughs to a wide variety of groups and fora, including but not limited to:

- High schools, middle schools, and higher education institutions
- Parent Teacher Associations (PTAs) and other parent associations
- Public libraries
- Community board meetings
- Precinct council meetings
- New York City Housing Association events
- New York Police Department events

Staff conducting community outreach offer event attendees Family Court Division brochures that describe the Division’s practice areas. This reader-friendly pamphlet details availability of victim services, community outreach and partnerships, a glossary of terminology, and information about the Division’s Youth Leadership Council.

### **Section 5. Provision of language access services**

#### **A. Interpretation**

The Law Department will utilize the following to deliver language access services:

1. *Over-the-Phone (OTP) Interpretation Services*

The Law Department will offer over-the-phone interpretation services through the citywide service contract managed by the Department of Information Technology and Telecommunications. The contracted services will be provided by *Voiance*. The Chief of the Litigation Support Division manages this vendor and agency staff are trained on how to access these services.

2. *In-person Services*

In-person and call-in services will be available at points where the Law Department encounters the public to provide language access to individuals with limited English proficiency whenever feasible.

**B. Translation**

1. *Document Translation Services*

The Law Department procures document translation services for agency staff when needed. The Law Department utilizes the Geneva Worldwide Services to provide this service. The agency has ensured continuity in services and there has been no lapse in service provision. The Chief of Litigation Support manages this vendor and agency staff are trained on how to access these services.

In CY 2023, there were 61 total instances where documents were sent for translation. Below is a snapshot of our agency’s document translation requests.

LANG	# REQUESTS	% REQUESTS
English (US)	46	75.4%
Spanish (US)	8	13.1%
Romanian	3	4.9%
Other <sup>2</sup>	2	3.3%
Korean	1	1.6%
Spanish (LA)	1	1.6%

2. *Plain language Principles*

The Law Department will be implementing a process requiring that staff responsible for drafting and approving all commonly distributed documents review public facing documents produced by the agency for consistency, accuracy, and to guarantee the information includes common, everyday words whenever possible. These commonly distributed documents will be reviewed by the subject matter expert and a member of the language access team before being published and translated. Staff responsible for the development of these documents will receive

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<sup>2</sup> In these two instances, the precise language was not captured.

plain language training. Law Department outreach materials will be drafted using plain language principles that include but are not limited to:

- Content is written in short sentences.
- Content is broken down with lists and headers.
- Content is written in the active voice.
- Content does not contain jargon.

The Law Department has copies of the New York City Language Identification Poster and the Notice of Interpretation Services signage, developed by the Mayor's Office, posted at all points of contact to inform individuals with limited English proficiency that interpretation services are available and to identify the language access needed.

The Law Department will also communicate its language access services through the agency's website. All Law Department staff who interact with the public will receive training and printed instructions on how to use the OTP and other language access services.

### *3. Communications*

The Law Department provides public awareness of language access services through its website. The website provides notification to the public of the availability of free interpretation services and translated materials. Additionally, as noted before, the agency's Disability Services Plan is featured on MOPD's website.

The materials are available in all 10 languages as required by LL30. As part of the Law Department's LAIP, these materials will also be added to the Family Court Division's website. In addition, the Family Court Division's outreach team will collaborate with the LACs and MOIA's Outreach unit to further explore the principles of language justice and enhance the Family Court Division's capacity to serve individuals with limited English proficiency.

The Law Department will post translated essential documents on its website, if any. There are currently no plans for full-scale website translation; however, the Law Department will adopt any Citywide website translation and language access standards once they are established.

### *4. Staffing and Contracts*

Historically, the five most common languages requested by the Family Court Division were Spanish, Chinese-Mandarin, Bangla, Russian and Arabic. Notably, while these are the most popular languages, others are provided. The agency provides interpretation services through its vendor, *Voiance*, and has distributed agency-wide guidance and instructions on how to secure interpretation services. Additionally, the Family Court Division has included trainings on *Voiance* in its orientation for new staff, and refresher trainings for existing staff members. With the assistance of our vendor for translation services, Geneva, we continue to provide translated documents in the ten designated citywide languages required by Local Law 30.

### *5. License, Permit, or Registration*



The Law Department currently does not issue licenses, permits or registrations as contemplated in LL 30, § 23-1102b(12)(i).

### **C. Emergency communications**

The Law Department does not provide emergency services to the public. In emergency circumstances, the Law Department's communications would be directed internally to employees. The agency's Director of Security also shares these communications with security directors across other city agencies.

In the rare circumstance in which the agency needs to provide critical information to the public (i.e., reduction in office hours or office closure), this message will be available in over 100 languages through the agency's website and through notifications to agency-issued mobile devices and agency email accounts. Additionally, in the rare circumstance where members of the public are seeking in-person agency services, we would use telephonic interpreter services to communicate the necessary information.

The following point people have been identified to meet any language access needs in the event of an emergency: Alexander Ly (Director of Security), and Language Access Coordinators Karlyne Fequiere and Celina K. Fletcher-Serrant.

## **Section 6. Resource planning**

The Law Department has historically offered the full cadre of language access services and resources described in this Plan. The agency strives to enhance the quantity and quality of the interpretation and translation services provided. In addition to the currently available resources, the Language Access Coordinators and other designated staff are working to identify new resources and innovative processes to better serve members of the public with limited English proficiency.

The Law Department is committed to full compliance with Local Law 30 and will continue to prioritize strengthening existing contacts and relationships with communities that have historically been underserved by ensuring agency staff members have the skills to increase the Law Department's language capacity and cultural competency.

In addition to methods to collect data from members of the public whom the Law Department provided Language access services, the Law Department gathers information from employees who service the public to incorporate their ideas and feedback and improve the language access service continuum. Employees in public facing areas are encouraged to provide feedback to the Language

Access Coordinators and Division Chief of Operations to identify any challenges with service access and/or vendors. In addition, the Administration Division periodically reviews its delivery of language access services to identify any gaps or shortfalls.

## Section 7. Training

In furtherance of the Law Department's goal to enhance language access programming, the agency is developing new language access training modules for frontline staff and managers that interact with members of the public. Training content will be consistent with content contained in the Citywide training models developed by the MOIA. The Law Department launched a new training cycle in September 2023 whereby the mandatory Equal Employment Opportunity (EEO) onboarding training for new Law Department employees outlines the foundation and requirements of Local Law 30, and the importance of language access at the Law Department.

The Law Department's language access training will be offered in a variety of formats. Topics to be covered will include, but not be limited to:

- The rationale for language access
- The City's demographics
- The Law Department's legal obligations under Local Law 30
- The Law Department's language access policies and standard procedures
- How to access the Law Department's language access resources
- How to identify the primary language of an individual with limited English proficiency
- Plain language principles
- Tracking and reporting requests for language services including document translation,
- How to use dual handsets
- How to use telephonic interpreters.

The Law Department's language access training modules will also include guidance on how to track language services provided and how to provide customer service to individuals with limited English proficiency.

In most Law Department practice areas, there are processes for staff to notate the individual's preferred spoken and written language. Through the training process, the agency will ensure that there are clear guidelines for staff on how to solicit and note the preferred spoken and written language of members of the public with whom they interact.

Staff that conduct community outreach will also receive specific training covering language access in the context of their engagement activities.

Training attendees will use a physical sign-in sheet (for in-person trainings), or a virtual sign-in sheet (for virtual trainings) combined with the respective virtual platform's attendance feature, to track and monitor compliance with training. Periodic refresher training and training will be administered on an as-needed basis.

## Section 8. Continuous improvement planning

As part of the Law Department's LAIP and enhanced language access services, the Language Access Coordinators are working with designated staff to steward the implementation of LL30 and identify opportunities to advance language access across the agency. This assessment process will include the creation of mechanisms to evaluate feedback from members of the public who have used language access services, and to assess and the quantity and quality of both translation and interpretative services. Processes for gathering feedback will be multilingual and easily accessible.

The LACs or designee reviews the tracking of language services no less than quarterly. The agency will also conduct a random sampling of staff that have used language services during the quarter to assess the delivery and quality of such services from the provider perspective.

The Law Department will measure the performance of the LAIP by tracking point-of-contact reports by OTP usage reports. The Law Department's Operations Division maintains quantitative data illustrated the agency's use of language access services. Operations staff members also assist with gathering qualitative feedback from members of the public that have used in-person interpretation services.

### A. Data collection and monitoring

The data for the following indicators will be collected and analyzed no less than quarterly by the LACs or designee:

Language Access Service Provision Indicators
<i>Indicator 1</i>
# of completed customer requests for interpretation over the phone through OTP services or In -person through OTP service provider
<i>Indicator 2</i>
# of documents translated
<i>Indicator 3</i>
Summary of languages accessed

*Indicator 4*

% of translations by language

*Indicator 5*

% of interpretations by language

## **B. Language Access Complaints**

The Law Department's Language Access Coordinators monitor language access complaints from receipt through resolution and review an aggregate reporting of interpretive services on a quarterly basis. The Language Access Coordinators will be identified as the individuals responsible for receiving, tracking, and resolving complaints. Additionally, a designated email address ([languageaccess@law.nyc.gov](mailto:languageaccess@law.nyc.gov)) will collect and monitor any language access complaints. Alternatively, complaints can also be sent through [NYC311](#).

The Law Department will also:

- Post multilingual signage at walk-in sites about language access service complaint channels.
- Disseminate translated flyers that contain information about the language access complaint channels.

### **Vendor Complaints and Quality Assurance**

The Law Department submits complaints to vendors when a service user encounters quality control concerns. A formal protocol is being developed for documenting instances of poor-quality services and making formal complaints with the vendor to promote prompt resolution.

In addition, to ensure quality assurance for document translation, the agency will have translated documents reviewed by bilingual employees who are fluent in the languages in which the documents are translated. In the event no staff member is available or capable of reviewing the documents, outside review will be arranged.

- Deliver outreach presentations containing information about the language access complaint channel.
- Post multilingual information on the Law Department's website about the language access complaint process that is accessible to users with limited English proficiency.

All Division offices that interact with members of the public will have on-site Language Access liaisons available to respond to inquiries and receive language access complaints. The division liaisons submit any complaints received to the Language Access Coordinators. The Language Access Coordinators will contact the appropriate staff member to investigate the complaint,

respond to the complainant, and if necessary, assist with guidance regarding language access. Complaints will be resolved within 14 days.

**Section 9. Goals and actions planning**

The implementation of the Law Department’s LAIP will be executed under the leadership of the Language Access Coordinators, Karlyne Fequiere and Celina K. Fletcher-Serrant. Designated staff will work with agency leadership and Division Chiefs to ensure that the policies and procedures implemented pursuant to this plan are integrated into agency operations and that all goals and timelines are met.

The language access team at the Law Department will continue to meet regularly with the agency’s leadership and staff identified as having responsibilities under this plan. The purpose of these meetings is to share information about language access resources, review internal data and plan for future needs.

The Law Department’s LAIP will be updated no less than once every three years and the updates will be posted on the Law Department’s website as required by Local Law 30. Details on the implementation plan of the Law Department’s 2024-2027 language access goals are below:

**A. Implementation Timeline**

The Law Department will work diligently to execute the efforts set forth in this plan. The following is a summary of key milestones for plan implementation and target dates.

<b>Goals, Milestones and Target Dates</b>		
<b>Goal # 1:</b> Identify and translate the Law Department’s “most commonly distributed documents” within the Tort and Administrative and Regulatory Law Divisions		
<b>Milestone 1</b>	Conduct survey process to identify the agency’s most commonly distributed documents gauged by frequency of distribution	January – June 30, 2024
<b>Milestone 2</b>	Review documents identified through survey process finalize list.	September 30, 2024
<b>Milestone 3</b>	Complete plain language review of final documents to determine if revisions are necessary.	December 31, 2024
<b>Milestone 4</b>	Request translation of identified documents.	January 31, 2025

<b>Milestone 5</b>	Distribute links to documents in print form and post any that should be made available on the agency's website.	May 31, 2025
<b>Goal # 2: Revise Law Department's Policies and Procedures Addressing Language Access</b>		
<b>Milestone 1</b>	Conduct assessment of how the public-facing divisions are implementing Local Law 30 to identify opportunities for enhanced processes and procedures.	August 31, 2024
<b>Milestone 2</b>	Appoint language access liaisons to assist the Law Department's Language Access Coordinators with the execution of implementation plan goals and ongoing language access service coordination.	December 31, 2024
<b>Milestone 3</b>	Revise agency procedures on language access to specify: <ul style="list-style-type: none"> <li>• How to identify a client/customer's preferred language</li> <li>• How to track preferred language in a database</li> <li>• What resources should be used to provide language services</li> <li>• When to use bilingual staff vs language services vendors and</li> <li>• How to request and use agency's language services</li> </ul>	June 30, 2025
<b>Milestone 4</b>	Enhance tracking systems that document clients'/customers' preferred spoken and written language	June 30, 2026
<b>Milestone 5</b>	Implement process for collecting customer service feedback that is multilingual and accessible to individuals with limited English can find and easily use such as: <ul style="list-style-type: none"> <li>• Written survey available in the 10 designated languages</li> <li>• Multi-lingual QSR code survey feature</li> </ul>	June 30, 2025
<b>Milestone 6</b>	Enhance methods to publicly and multilingually promote the ways in which individuals can submit language access complaints using: <ul style="list-style-type: none"> <li>• link on website</li> <li>• dedicated email address</li> <li>• multilingual signage</li> </ul>	December 31, 2024

<b>Goal #3: Revise Training Modules for Frontline Staff and Managers on the Law Department's Language Access Obligations &amp; Policies and Procedures</b>		
<b>Milestone 1</b>	<p>Update and design refresher training modules for specified Law Department front-line staff and managers that will address the Law Department's language access obligations, services, and policies and procedures including but not limited to:</p> <ul style="list-style-type: none"> <li>• Legal obligations and agency policy on language access (including Local Law 30)</li> <li>• When and how to use telephonic interpretation</li> <li>• When and how to use in-person interpretation</li> <li>• When and how to request translation services</li> <li>• When to use and not use bilingual staff</li> <li>• How to identify the primary language of a person with LEP</li> <li>• How to track the individual's language</li> <li>• How to track whether and how language services are provided to the individual</li> <li>• How to provide customer service to individuals with LEP</li> </ul>	September 30, 2023 through December 31, 2024
<b>Milestone 2</b>	Design new training modules for staff responsible for outreach activities that will address the Law Department's language access obligations, services, and policies and procedures in the context of outreach activities to include content covered in MOIA's outreach guidance materials.	December 31, 2024
<b>Milestone 3</b>	Incorporate revised training modules into onboarding training curriculum.	September 30, 2024
<b>Goal #4: Enhance Staff Awareness of the Law Department's Language Access obligations and goals</b>		
<b>Milestone 1</b>	<p>Revise the Law Department's Language Access page to include:</p> <ul style="list-style-type: none"> <li>• Link to Revised LAIP</li> <li>• Information on how to submit language access complaints including link to 311</li> <li>• Dedicated language access email address for language access inquiries and complaints</li> </ul>	May 30, 2023

<b>Milestone 2</b>	Distribute annual email to all Law Department exchange with information regarding language access obligations and resources	May 30, 2023
Goal #4: Refresh signage and language access guidance materials at Law Department offices that receive members of the public		
<b>Milestone 1</b>	Refresh and post signage about the availability of free language services prominently in offices that receive members of the public including: <ul style="list-style-type: none"> <li>• Multilingual notice of how to file a language access complaint</li> <li>• Multilingual feedback survey</li> </ul>	June 30, 2023
<b>Milestone 2</b>	Provide division offices that receive members of the public with additional “I-speak” cards	June 30, 2023