

FDNY LANGUAGE ACCESS IMPLEMENTATION PLAN June 2021

I. Agency Name and Language Access Coordinator

Fire Department of the City of New York
Steve Ertrachter, Executive Director of Licensing.

II. AGENCY MISSION AND BACKGROUND

The Fire Department (FDNY) provides services including:

- Responding to fires
- Providing Public safety strategies
- Responding to medical emergencies
- Responding to disasters
- Responding to terrorist acts
- Performing inspections and testing
- Licenses and Certifications

The FDNY protects the lives and property of NYC residents and visitors. The FDNY advances fire safety through its prevention, investigation and education programs, and contributes to the City's homeland security efforts. It responds to more than 278,000 fires and non-fire related emergencies and more than 1.3 million medical emergencies each year. The FDNY maintains approximately 250 firehouses and ambulance stations.

FDNY's Bureau of Fire Prevention certifies individuals and inspects various locations that are regulated by the NYC Fire Code. In addition to providing study materials to prepare for each exam, the FDNY provides helpful information to numerous industries that have potential hazards.

THE SERVICES THAT ARE PROVIDED BY THE FDNY TO THE GENERAL PUBLIC INCLUDE:

- Fire Suppression
- Emergency Medical Service
- Fire Prevention Inspections
- Certificate of Fitness Licensing
- Fire Safety Education
- Fire Investigation

FDNY INTERACTS WITH THE PUBLIC:

- during emergency situations;
- via inspections;
- via field and/or by home visit;
- over the phone and via electronic mail/fax;
- through different Certificate of Fitness seminars, classes and/or examinations;

- via public hearings, as well as other public events (such as forums, town halls, and during fire prevention week).

The FDNY's Bureau of Fire Prevention (BFP) has approximately 400 Fire Protection Inspectors, who inspect equipment and component parts of buildings for permitting and licensing. They also observe system tests. BFP inspectors conducts more than 225,000 inspections each year.

BFP has distinct units responsible for different kinds of inspections. These include, among others:

- **Bulk Fuel Safety Unit** whose inspectors inspect motor fuel storage systems at gas stations;
- **District Offices** inspectors typically issue FDNY violations and track renewals / inspections for FDNY permit accounts;
- **Explosives Unit** inspects and issues permits for explosives, fireworks and special effects;
- **Fire Alarm Inspection Unit** witnesses tests of new or altered fire alarm systems in the commercial buildings;
- **Fire Suppression Unit** witnesses tests of the sprinkler and standpipe systems;
- **Public Safety Unit** that inspects high-rises and places of public assembly such as daycare centers, pre-K programs, etc.

The fire operations field activities are performed by the uniformed personnel and are called "risk-based" and "mandatory" inspections (formerly AFID). There are about 43,000 risk-based inspections and 61,000 mandatory inspections conducted each year.

III. AGENCY LANGUAGE ACCESS POLICY AND GOALS

The FDNY's goal is to continue providing interpretation and translation services to all customers who do not speak fluent English through the Language Line. Important forms and pamphlets are translated into the languages required by Local Law 30. When FDNY employees speak the native language of the Limited English Proficiency (LEP) customers, the employees will assist with interpreting basic information to provide the best possible customer service.

Through interpretation and translation, the FDNY continues to make sure important safety messages reach all New Yorkers in a way that they can understand.

In order to comply with Local Law 30, the FDNY has translated many documents that are useful to the public in order to carry out its mission and protect the lives and property of New York City residents and visitors.

IV. AGENCY LANGUAGE ACCESS ACCOMPLISHMENTS AND PROGRESS ON GOALS FROM PREVIOUS LAIP

FDNY produced multilingual versions of more than 20] informational pieces for distribution to the public, including through social media on numerous topics that benefit the business community and residents.

During the pandemic, these multilingual fire prevention materials included brochures regarding safe sidewalk restaurant heating and safely keeping alcohol-based hand sanitizers.

FDNY supported accessible home vaccine distribution with the use of telephonic interpretation.

To ensure ongoing Fire Education when in-person classes were cancelled, FDNY expanded its educational videos with subtitles and posted those to social media platforms. Many of the voices were from bilingual FDNY staff.

V. LIMITED ENGLISH PROFICIENCY (LEP) POPULATION ASSESSMENT

To assist service providers in determining what steps are necessary to provide meaningful access to the LEP population they serve, the Department of Justice developed a four-factor analysis.

FACTOR 1: THE NUMBER OR PROPORTION OF LIMITED ENGLISH PROFICIENCY (LEP) PERSONS IN THE ELIGIBLE SERVICE POPULATION

FDNY's service area includes all of New York City. The FDNY can only estimate in the broadest terms the number of LEP persons to whom the FDNY provides emergency services. FDNY estimates that 23% of the New York City's population are LEPs as identified.

FACTOR 2: THE FREQUENCY WITH WHICH LIMITED ENGLISH PROFICIENCY (LEP) INDIVIDUALS COME INTO CONTACT WITH THE AGENCY

FDNY Fire Safety Education staff and field personnel conducts events in:

- Community centers;
- Senior center facilities;
- Pre-school, elementary and high schools;
- Firehouses;
- Other places of assembly.

When available, events will continue throughout the community.

Fire safety presentations are done in schools throughout the city and specifically target neighborhoods that have experienced fatal fires.

Before we visit a school, to determine the ethnic and language mix, our fire safety educators:

- (a) consult a census map; and
- (b) discuss the student population with school personnel.

Based on that information, the FDNY brings language-appropriate materials. Many of our fire safety events require some translated materials. Fire safety educators bring English and other popular language materials to all events, especially at the larger public events. The FDNY inquiries about the language needs prior to events.

At fire safety events following fatal or serious fires, we assess the community needs with the community organization coordinators of these events. In schools, we primarily use English. The most frequent languages for which we see a need are Spanish, Russian and Chinese.

For 2020, 5,875 calls were placed to Language Line for the Emergency Medical Department. Some of these calls may have not directly been connected to Language Line due to disconnect and or errors. Some of the 911 calls that are transferred from NYPD already have an established connection with Language Line so that is also not accounted for in this number.

In addition, general statistics show that some of our services are more frequently provided in the City's minority and economically distressed communities that may have larger LEP populations. EMS has reported that they use the Language Line most frequently for Spanish, Chinese and Russian.

FACTOR 3: THE IMPORTANCE OF THE BENEFIT, SERVICE, INFORMATION, OR ENCOUNTER TO THE LIMITED ENGLISH PROFICIENT (LEP) PERSON

The agency offers LEP assistance, on as needed basis, to the people while providing the above services.

When an applicant/client calls, visits or encounters FDNY's office(s), or when FDNY employee enters applicants' premises (whether its work or home) language must not be a barrier to the receipt of appropriate services.

This Language Access Implementation Plan reflects FDNY's commitment to providing language access services and meeting the following over-arching goals to:

- Ensure that language is not a barrier to FDNY services;
- Ensure that all applicants and clients have equal access to the services for which they are eligible, regardless of the level of their English proficiency;
- Inform all FDNY applicants and clients that free interpretation services are always available; and
- Train front-line staff on the importance of ensuring access to free interpretation services for all LEP clients.

FACTOR 4: THE RESOURCES AVAILABLE TO THE AGENCY AND THE COST OF PROVIDING VARIOUS TYPES OF LANGUAGE SERVICES

The FDNY uses bilingual staff and the Language Line to speak with our clients in their preferred language.

FDNY employees assist members of the public on the ground floor of the FDNY headquarters. Individuals come to the public section of the building to submit plans and/or paperwork, take exams for Certificates of Fitness, and/or request fire reports.

Further, the Public Certification Unit provides 2 telephone lines to reach the Language Line. FDNY staff has been trained to use the Language Line. Additionally, the location has stationary signs in the following seven languages:

- Spanish
- Italian
- Creole
- Chinese
- Russian
- Arabic
- Korean

FDNY's Public Certification waiting area has an electronic LCD monitor that plays a slideshow (loop); it's installed to display relevant information in different languages for the applicants coming in and waiting to take an exam.

One of the slides informs the applicants that if they have an English language difficulty; the exam may be read to them by one of the COF employees. Another slide shows that interpretation services are available free of charge, upon request.

Signs that describe the services the FDNY provides are posted on the 1st floor. The agency will obtain more signs in accordance with Local Law 30.

Outside vendors provide professional interpretation and translation services. FDNY has contracted services with several different vendors (ex. Geneva Worldwide) to professionally translate written materials (popular material from FDNY website as well as other useful brochures) into Local Law 30 required languages. We expect to have materials translated on an ongoing basis and will continue to translate FDNY resources into 2019. Translated materials are proofread for accuracy before becoming a final document. FDNY coordinator will be in constant contact with parties implementing the Language Access Implementation Plan. Local Law 30 requires agencies to submit annual reports to track compliance.

The Public Certification Unit hired greeters that are highly trained to provide customer service to all applicants, including LEP.

FDNY Bureau of Fire Prevention field inspectors were all given smartphones before end of 2016. Field inspectors use these smart phones for the Language Line, as needed.

VI. PROVISION OF LANGUAGE ACCESS SERVICES

The FDNY provides language access services via multiple channels:

IN WRITING/ON FDNY WEBSITE:

- The FDNY commonly distributed documents that are translated into the Local Law 30 designated languages. The FDNY also provides helpful emergency preparedness information which is translated to ten (10) languages. Further, important forms are also translated into different languages to assist LEP customers. The FDNY is in the process of reviewing and revising forms and documents previously generated by the FDNY to ensure that they meet plain language standard.
- FDNY translated documents that are currently available on the agency's website. Priority in translating is given to the documents that are viewed and downloaded most frequently.
- Public Certification Unit employees have been trained to write study materials and exams that are administered to the public in plain English language. The material is written in simple sentences that are easy to read and understand.
- The NYC Fire Code requires that certificate of fitness applicants have a reasonable understanding of the English language and be able to answer satisfactorily such questions as may be asked of such applicant upon his or her examination. While all the exams are given in English, we provide dictionaries and allow applicants to bring their own dictionaries for the Certificate of Fitness exams; and make every reasonable accommodation to LEP customers.
- The FDNY utilizes Language Line to write and proofread the translated pamphlets for small businesses owners. Field inspectors provide the materials with useful information in different languages to small business owners as well as to the public; as needed.

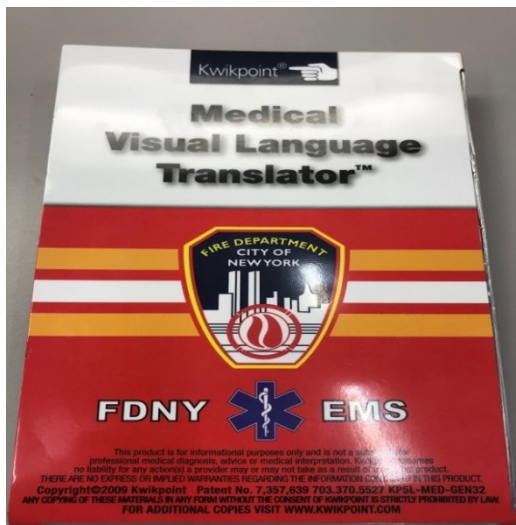
SERVICES DURING EMERGENCY DISASTER:

- In case of broad-scale emergency response, the FDNY will work with NYC Emergency Management on instructions for NYC residents and visitors.
- For extended operations, events that affect multiple areas in the city, federally declared disasters, and notice events, FDNY will participate as needed within the City's emergency response structure, including working with the interagency Language Access Task Force.
- As needed, FDNY will activate its Continuity of Operations (COOP) plan to ensure continued services for all New Yorkers.
- FDNY continued to provide a range of services for the NYC community throughout the COVID-19 pandemic to advance its mission to protect life and property.

IN PERSON:

- FDNY Inspectors and employees who greet the public at the Public Certification Unit have access to the Language Line interpretation services.
- FDNY employees can obtain an interpreter by the phone to assist LEP customers in their native language. The Language Line currently offers interpreters for over 100 languages.

- In addition, multilingual FDNY staff may communicate with LEP customers who require basic assistance.
- FDNY displays an electronic presentation of Language Access policies in 10 different languages.
- Voter registrations hard copies are available in 5 languages and are presented in the Public Certification Unit in the waiting room, upon request. Voter registrations electronic copies are available online in 11 additional languages.
- The FDNY provides free interpretation for rule hearings, upon request. The interpretations will be provided by the Language Line. Although the hearing notice is provided in English, it is noted that free interpretation is available. Most of the individuals who represent businesses and building owners who receive the hearing notices speak and read English. The representatives typically understand the notice without interpretation.
- During fire or medical emergencies, FDNY staff has image cards to help customers identify common problems by pointing to a specific picture. See screenshots of the booklet below.



VII. TRAINING

All front-line staff who provide services to customers are trained. FDNY employees speak numerous languages and can communicate with LEPs as needed.

Supervisors train their front-line staff on how to properly assist LEP customers. In addition, employees are trained on how to use the Language Line services, through the special dual handset or via mobile phones in the field.

VIII. RECORD KEEPING AND EVALUATION

A. RECORD KEEPING

The FDNY tracks the use of all of our language access contracts, including the use of telephonic interpretation, on-site interpretation and written translation by program and location. The FDNY also gathers data on bilingual staff, whether they self-report as bilingual or are certified as bilingual through the selective certification process.

Language Line provides reports upon request summarizing the call duration, the language interpreted, as well as other metrics.

The data provided from the Language Line also shows that top 3 requested Language Line languages for the year were Spanish #1, Russian#2, and Mandarin #3, the rest of the languages fluctuated (as shown in the figure on the right).

B. EVALUATION

The FDNY produces various monthly and annual reports on telephonic interpretation, on-site interpretation, bilingual staff assistance and written translation services. These reports are reviewed by the FDNY and program leaders and compared to general service provision levels. The FDNY monitors the quality of our services through a variety of channels.

- On-site spot checking by program staff;
- Monitoring by the Mayor's Office;
- Feedback received via 311;
- Via community organizations;
- A customer service surveys conducted by the Office of Quality Assurance;
- Federal, state and local audits.

LANGUAGE ACCESS COMMITTEE

During implementation, the Language Access Plan will be reviewed on as needed basis by the Language Access Committee.

The Language Access Committee:

- Steven Ertrachter
- Jason Shelly.
- Fabricio Caro
- Nicole Simmons
- Aja Cox

The Language Access Committee will meet to ensure each unit of the agency continues to abide by the Language Access guidelines, and that new policies and procedures are adequately addressed.

THE LANGUAGE ACCESS COMMITTEE WILL LOOK FOR:

- ✓ Effectiveness of existing language assistance to LEP persons;
- ✓ Identifying additional written materials that require translation on the FDNY internet website;
- ✓ Identifying additional written materials that require translation at the headquarters;
- ✓ Fluctuations in a program's LEP population;
- ✓ Correspondence from NYC residents regarding Language Access Line (such as: Have there been compliments/complaints?)

IX. RESOURCE ANALYSIS AND PLANNING

The agency will address the changing needs on language access on as needed basis. The Language Access Committee members will evaluate current issues and develop plans which will solve the problems at hand. The group discussion between committee members will occur during meetings which are projected to occur on as needed basis.

- The FDNY will continue the services with existing vendors.
- The FDNY will continue translating most of the most commonly distributed documents into the Local Law 30 ten required languages.
- Since 2015, the FDNY Phoenix Society has organized Mandarin classes. These classes, funded by the FDNY Foundation, are open to all active and retired FDNY members. These voluntary weekly classes focusing on conversation are meant to facilitate communications between FDNY members and the public. Firefighters, EMTs and paramedics learn Mandarin through this initiative. We will consider what other programs can be offered going forward to expand knowledge and educate our staff. Currently this program is on hold due to Covid-19. Additional funds will be required for more FDNY employees to attend the DCAS certified "writing in plain English" course. We will consider alternatives to that course.
- We will also require additional funds for translating English material into Local Law 30 required languages. Funding amount is not clear as the number of documents that need to be translated are rapidly increasing.

X. OUTREACH AND PUBLIC AWARENESS OF LANGUAGE ACCESS SERVICES

The FDNY will post translated materials on its website. More importantly it has video files for public to view as well. Facebook, Instagram and Twitter are also used to make sure information can be widely viewed by many audiences.

Under the Education section on FDNY website, there is a Public Service Announcement header, which presents an initiative agency is currently running “Close the Door PSA”, which is interpreted and said in different languages in the video. With the basic message that when it comes to fire safety, the message is the same in many languages – “CLOSE THE DOOR” <http://www1.nyc.gov/site/fdny/education/fire-and-life-safety/public-service-announcements.page>

FDNY employees distribute materials in different languages during public events. FDNY inspectors continue to deliver important fire prevention and regulation requirements translated in different languages to businesses during site visits and inspections.

XI. LANGUAGE ACCESS COMPLAINTS

All 311 complaints are routed through the Commissioner’s office and are directed to specific unit to address each issue.

Further, if any FDNY Language Access issues are reported to 311, an e-mail is sent to Angel Scott, FDNY employee who would forward it to Language Access Committee. There has not been any complaints or requests via 311 for 2020.

Any issues received will be evaluated on case by case basis with the Language Access Committee before they are brought up to department heads.

XII. IMPLEMENTATION PLAN LOGISTICS

<u>Language access goal</u>	<u>Milestones</u>	<u>Responsible staff</u>	<u>Deadline</u>
Agency wide awareness	Issue FDNY directive to all staff	Language Coordinator	In process
Provide agency-wide customer service training	Training new and non-new inspectors and non-inspectors-annually. Approximately 600 people.	Jesus Martinez (Bureau of Fire Prevention, Training)	Currently conducted
Identifying all commonly distributed documents	Working with all the units to identify commonly used materials	Language Access Committee	Ongoing
Translating commonly distributed documents into 10 LL required languages	Working with Public Certification Unit to identify most commonly used public information	Language Coordinator	Ongoing
Tracking how language services are being provided	Working with coordinator for the 311 Language Access complaints and requests	Language Access Committee	Ongoing