

Language Access Implementation Plan  
May 2021



Jody Kaplan, Chief Customer Officer  
Lisa Lewis, Director of Customer Service  
**Language Access Team**  
**Department of Buildings**

Melanie E. La Rocca  
**Commissioner**  
**Department of Buildings**

Raquel Batista  
**Commissioner**  
**Mayor's Office of Immigrant Affairs**

Bill de Blasio  
**Mayor**

## TABLE OF CONTENTS

<b>INTRODUCTION</b>	<b>3</b>
<b>EXECUTIVE ORDER AND LOCAL LAW</b>	<b>3</b>
<b>I. ROLE AND RESPONSIBILITIES OF THE LANGUAGE ACCESS COORDINATOR</b>	<b>3</b>
<b>II. AGENCY MISSION AND BACKGROUND</b>	<b>3</b>
<b>III. AGENCY'S LANGUAGE ACCESS POLICY AND GOALS</b>	<b>4</b>
<b>IV. AGENCY LANGUAGE ACCESS ACCOMPLISHMENTS AND PROGRESS ON GOALS FROM PREVIOUS LAIP</b>	<b>5</b>
<b>V. LIMITED ENGLISH PROFICIENCY (LEP) POPULATION ASSESSMENT</b>	<b>5</b>
<b>VI. PROVISION OF LANGUAGE ACCESS SERVICES</b>	<b>7</b>
<b>VII. TRAINING</b>	<b>9</b>
<b>VIII. RECORD KEEPING AND EVALUATION</b>	<b>9</b>
<b>IX. RESOURCE ANALYSIS AND PLANNING</b>	<b>10</b>
<b>X. OUTREACH AND PUBLIC AWARENESS OF LANGUAGE ACCESS SERVICES</b>	<b>10</b>
<b>XI. LANGUAGE ACCESS COMPLAINTS</b>	<b>10</b>
<b>XII. IMPLEMENTATION PLAN LOGISTICS</b>	<b>10</b>

## Introduction

Language access is critical for New York City's diverse communities. The city is home to approximately 3.4 million immigrants, and almost half of all New Yorkers speak a language other than English at home. Approximately a quarter of New York City's population, or 1.8 million New Yorkers, identify themselves as Limited English Proficient (LEP).

## Executive Order and Local Law

Executive Order 120 of 2008 established a uniform policy and standards for translation and interpretation services for City agencies that have direct interaction with New Yorkers. It required that each City agency designate a Language Access Coordinator, develop a language access implementation plan and provide interpretation services for the top six languages spoken in New York City.

Local Law 30 of 2017 strengthens language access services for people with limited English skills and expands the list of designated citywide languages to 10. It requires City agencies that provide direct services to the public to translate their most commonly distributed documents into the top 10 citywide languages. It also requires agencies to provide telephonic interpretation in at least 100 languages and to develop a language access implementation plan to be posted on an agency's website.

### I. Role and Responsibilities of the Language Access Coordinator

The Language Access Coordinator at the Department of Buildings is Lisa Lewis, Director of Customer Service. The Language Access Coordinator has the following responsibilities:

- Works with agency stakeholders to creating a language access plan, monitor its implementation and maintain current and relevant policies and procedures
- Collects and evaluates customer data and program effectiveness
- Communicates with the Mayor's Office of Immigrant Affairs and the Mayor's Office of Operations on language access plan implementation strategy
- Develops and distributes materials to inform staff and customers of language access programs
- Convenes, supports, and maintains up-to-date contact information for staff assisting with the language access program
- Coordinates and assesses training to ensure staff is prepared to provide meaningful language access to LEP customers
- Oversees citywide contracts related to language access services (interpreting, translation, and cultural competency) to ensure quality assurance and cost benefits

### II. Agency Mission and Background

The New York City Department of Buildings (The Department) ensures the safe and lawful use of more than 900,000 buildings and properties by enforcing the Construction Code, Zoning Resolution, and other applicable laws. Each year it reviews construction plans, issues new and renewed permits, performs inspections, and issues licenses, registrations, and certificates. It facilitates construction by continually streamlining the permit application process and delivers services with integrity and professionalism.

DOB architects and engineers evaluate construction plans, verifying they meet Construction Code and zoning requirements. Inspectors monitor job sites to enforce building code and zoning regulations, and issue violations when appropriate. The Department issues a Certificate of Occupancy (C of O), which documents the legal use and/or occupancy of a building, when the required sign-offs are obtained. Administrative and support staff are dedicated to meeting the needs of the public by providing excellent customer service and developing streamlined operations that are effective and ensure public safety.

**Permits**

- Alterations – Room additions, conversions and renovations
- Construction Equipment - Fences, sheds, chutes, scaffolds, etc.
- Curb Cuts
- Demolition & Removal
- Electrical Systems
- Elevators
- Fire Suppression Systems
- Foundation/Earthwork
- Fuel Burning/Storage
- Mechanical and HVAC (Heating, Ventilating and Air Conditioning Systems)
- New Building Construction
- Places of Assembly
- Plumbing Systems
- Residential Work – Decks/porches, garages, fences, fireplaces, pools, water heaters, etc.
- Signs
- Sprinklers
- Standpipe Systems
- Subdivisions

**Licenses (issued and renewed)**

- Master Plumbers
- Master Fire Suppression Piping Contractors (Class A, B and C)
- Welders (Classes 1-4)
- Engineers (Stationary and Portable)
- Hoisting Machine Operators (Class A and B)
- Hoisting Machine Operators (Class C)
- Master Sign Hangers
- Special Sign Hangers
- Master Riggers
- Special Riggers
- Elevator Inspectors
- Elevator Agency Directors
- Oil Burning Equipment Installers (Class A & B)
- Climber or Tower Crane Riggers
- Site Safety Coordinators
- Site Safety Managers
- Cement Testing Laboratories
- Master Electricians
- Special Electricians

**Registrations**

- Construction Superintendents
- Filing Representatives
- General Contractors

**III. Agency's Language Access Policy and Goals**

**A. Language Access Policy**

The Department provides both interpretation and translation services to ensure LEP individuals have access to the information and services they need. This includes notifying customers of their rights to free language services and enforcing the provision of these services through staff training and outreach.

**B. Agency Language Access Goals**

The Department of Buildings aims to provide meaningful access to services and materials by updating and continuing to implement an agency-specific language access plan for LEP applicants, homeowners, business owners, tenants and other customers. This includes:

- Strengthening internal and external training and outreach initiatives.
- Translating documents that affect public and worker safety
- Implementing plain language guidelines and providing cultural sensitivity resources.

**IV. Agency Language Access accomplishments and progress on goals from previous LAIP**

Goal	Update
Confirm a language access liaison for each borough office and central unit to monitor language access services and serve as a resource for unit staff.	<b>Completed</b>
Train all staff on Local Law 30	<b>Completed</b>
Implement plain language guidelines and provide cultural sensitivity resources	<b>Completed</b>
Produce annual Language Access Report	<b>Completed</b>
Update Language Access Plan	<b>Completed</b>

**V. Limited English Proficiency (LEP) Population Assessment**

As guided by Local Law 30, the Department of Buildings applies the “four factor analysis” as outlined by the U.S. Department of Justice to assess obligations for language access as the basis for its Language Access Implementation Plan.

The Department of Buildings utilizes the top ten designated citywide languages to provide services to LEP customers. We vary the delivery of these services based upon the frequency of contact or anticipated contact of LEP customers. Reasonable steps are taken to accomplish our goals but at the point at which costs approach or exceed the benefits, alternative methods of delivery of language services will be evaluated and appropriate changes made.

**A. Execution of the U.S. Department of Justice's Four-Factor Analysis**

- **Factor 1: The number or proportion of LEP persons in the eligible service population**  
 The Department determined the proportion of LEP persons identified based on data obtained from 311 and a survey of our customers. Data is also taken from the [American Community Survey](#) made available by the NYC Department of Planning. Our 2020 assessment is that less than one percent of customers who visit or contact our borough and central offices are persons who are Limited English Proficient.

The Department of Buildings applies the analysis undertaken by the Mayor’s Office of Immigrant Affairs under Local Law 30 to determine the top ten citywide languages based on data from the Census. Based on this analysis, the ten citywide languages for FY18 - FY21 are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish.

- Factor 2: The frequency with which LEP individuals come into contact with the agency**  
 The Department tracks the number of LEP customers we encounter by requiring units to provide a monthly report of the customers who receive services from staff volunteers. We also monitor the monthly billing reports from the language interpretation vendor. Below is data from 2020 time period:

Language	Vendor	Volunteer
Cantonese	3	0
Mandarin	6	0
Spanish	20	33
Russian	1	0
Total	30	33

In 2020, in-person customer service was limited due to pandemic safety measures. Interaction with LEP customers was based on telephone customer service.

- Factor 3: The importance of the benefit, service, information, or encounter to the LEP person**  
 It is the Department's intent to provide meaningful access to all customers and eligible individuals with a focus on actions that directly impact public safety including issuance of violations, vacate orders and stop work orders, legal actions, and life and safety notices.
- Factor 4: The resources available to the agency and the costs of providing language services**  
 The Department budgets for and utilizes the current vendors contracted by the NYC Department of Information Technology and Telecommunications: Voiance, Inc. for telephone interpretation and Geneva Worldwide for document translation services. The Department also makes use of the citywide and internal volunteer language bank and internal volunteers.

**Evaluation of language access needs of agency’s service population**

Based on our assessment of the above factors, a small number of Department of Buildings’ customers are Limited English Proficient.

While speakers of the ten Designated Citywide Languages under Local Law 30 account for more than 85% of foreign-born New York City residents with LEP, the Department of Buildings aims to provide language interpretation services to customers who need other languages receive services.

In order to ensure that Department of Buildings' Team members can effectively engage with these hard-to-reach communities that it has identified, MOIA provides interpretation in and translates materials and collaborates with the External Affairs and Inspection Units.

## **VI. Provision of Language Access Services**

The Department of Buildings provides language access services in line with the citywide designated languages through staffing and contracts. We currently provide in-person interpretation with onsite volunteers, use Language Line Services, Inc. for telephone interpretation and Geneva Worldwide for document translation. Throughout our borough offices, we have posted multilingual signage in high traffic locations informing customers of the availability of free interpretation services. The Department identifies and translates the most commonly distributed or requested materials by our customers that provide information related to public and worker safety, including emergency preparedness and response. We review and revise documents following the plain language guidelines prior to translation.

### **A. Translation Services**

- **Essential Documents**

The OATH Summons/Violation and instructions were updated to meet plain language guidelines and are available in the designated citywide languages on the Department website. The below documents are in the process of being evaluated for plain language and translation:

  - AEU-2: Certificate of Correction
  - LS-4: No Access Notice
  - Stop Work Order
  - Vacate Order
  
- **Plain Language Guidelines and Standards**

A plain language working group led by the Assistant Commissioner of Strategic Policy & Industry Relations and including the Assistant Commissioner of Communications, Senior Advisor for Policy Engagement and Outreach, Chief Customer Officer, and Executive Director of the Administrative Enforcement Unit meets regularly to review documents before public distribution and translation.
- **Service Notices, Press Releases and Website Content**

The plain language working group also reviews notices, releases and the website to ensure accessibility and translation of this content as appropriate.
- **Ensure Quality of Translations**

The Department obtains translation services only from vendors who have a master contract with the City through an extensive RFP process. Vendors have internal proofreading and editing processes. When available, the Department's bilingual staff review translated documents for quality, accuracy and appropriateness of terminology. Based on customer feedback and standards, internal staff are evaluated for effectiveness in providing translation services. Internal outreach is also conducted to identify staff that is proficient in other languages.

## **B. Interpretation Services**

- Types of agency interactions that require translation services
  - In-person office visits
  - Telephone interactions
  - Inspector visits to properties
  - Materials provided on the website, at meetings and throughout our offices that communicate essential public and worker safety information and by request.
  
- Identify LEP individuals and their primary language  
Evaluating the ability of the customer to communicate effectively is essential in providing great service.
  - If customers do not verbally identify their primary language, staff are trained to ask for the language that they speak at home
  - If staff cannot identify a LEP customer's language by asking, they are instructed to use a Language Identification Card that is available at every service location and provided to all inspectors. The message underneath each language states: "Point to your language. An Interpreter will be called."
  - If the interaction is by telephone and the language cannot be identified, staff is instructed to call Voiance and seek assistance from the vendor to identify the language.
  
- Provide Interpretation Services  
The Department provides (spoken) interpretation in over 100 languages by our existing bilingual staff volunteers and paid vendor, Voiance. We continue to identify new volunteers that can provide interpretation services.
  
- Ensure Quality of Interpretation Services  
The Department uses interpreters who have demonstrated proficiency in both English and the intended language and received training that includes the skills and ethics of interpreting (e.g. issues of confidentiality), fundamental knowledge in both languages of any specialized terms or concepts and sensitivity to the client's culture.

## **C. Notification of Free Interpretation Services**

Information about the availability of interpreter services, which is free of charge, is prominently displayed in public areas of borough and central offices. Posters (11" x 17") or desktop displays (8 ½" x 11") are posted in public areas and counters to assist limited English speakers to self-identify their language. "I Speak" cards are also available at all service center windows. The signage is in the most frequently encountered primary languages of customers served by those facilities. In addition, the television monitors at each location include content that welcome customers in multiple languages.

## **D. Emergency Preparedness and Response**

The Department's Emergency Response Team has access to Voiance and received language access training along with all Department inspectors. A language access representative is on the Department's Continuity of Operations (COOP) planning committee to ensure that NYC Emergency Management protocols are followed.



## **VII. Training**

The Department's commitment to Local Law 30 requires trained and knowledgeable staff. The Customer Service Unit staff led by its Deputy Director conducts training sessions for frontline workers and managers. The sessions include the procedures and policies for assisting LEP customers in-person, by telephone and through written correspondence. It also includes tools and documents to guide employees in providing meaningful access to information and services to LEP customers.

This training is provided during the new hire orientation session for all employees in public contact positions or when a staff member's job description changes and requires contact with the public. In addition, information about language access is included in the annual customer service training self-study that is required of all staff. Inspections staff receive this training at an annual in-person customer service training. The Customer Service Unit maintains a list of all employees that receive LEP program-related training.

### **Updates to training content for Local Law 30**

New trainings will provide instructions on the proper use of the Language Identification Card and the Language Access Questions to assist in identifying a customer's primary language. Buildings staff will also be instructed to document the individual's native language and provide this information to the Customer Service unit for its data collection efforts.

### **New training topics**

The Mayor's Office of Operations is working with the Department of Citywide Administrative Services (DCAS) to incorporate language access, cultural sensitivity and disability communications into a re-developed training for front-line staff.

## **VIII. Record Keeping and Evaluation**

The Department maintains records pertaining to the requests for services in non-English languages and our capacity to serve these populations. We ensure the quality of our language access program by gathering feedback from the interactions LEP customers have with the Department. The Language Access Coordinator in each borough office and central unit provides a monthly report to the Director of Customer Service that includes interactions with LEP individuals during in-person visits at customer service windows and inspections, telephone calls, outreach involving the public, community and civic meetings, conferences and scheduled appointments.

To ensure the success of the language assistance program, the customer service unit monitors the LEP program periodically, but not less than annually, to assess the effectiveness and efficiency of the program. Review will include evaluating:

- Feedback from LEP clients
- Feedback from staff
- In-house reviews of the current communication needs of LEP clients
- Contact with community-based organizations that provide services to LEP clients

## **IX. Resource Analysis and Planning**

We will continue to utilize bilingual staff volunteers (25+) and citywide contracts to provide language services. We currently have contracts with two vendors Geneva Worldwide, Inc. (translation) and Voiance (interpretation) to provide training, foreign language interpretation and translation services to assist our LEP customers. The following cost-saving measures can also be explored:

- Expand outreach for volunteer language bank participants
- Centralize interpreter and translation services

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

The Department will utilize all forms of community affairs and marketing opportunities to enhance communication with members of the public regarding language access. In collaboration with the Department's External Affairs Team, the Customer Service Team will communicate with members of the public at meetings of community boards, civic associations, homeowners' groups, borough presidents and precinct councils. The language access coordinator will also work with communications staff to expand the translation of the most requested Department documents and engage in outreach with local ethnic press.

## **XI. Language Access Complaints**

The Department will investigate all LEP complaints submitted to and received from 311 and all other forms of communications (telephone, email and postal correspondence). The point of contact for complaints is the Language Access Coordinator who will be responsible for the intake of the complaint, tracking, resolving and reporting the complaint to MOIA. The following protocol will be implemented within ten (10) business days if a complaint is received:

- An investigation initiated by the Language Access Coordinator
- Follow up with the impacted customer to provide necessary services
- Retraining for the involved staff member(s)
- Follow up, if warranted, with written communication from the Commissioner

## **XII. Implementation Plan Logistics**

The Department's Language Access Coordinator is Lisa Lewis, Director of Customer Service who oversees the provision of services to Limited English Proficient individuals. This includes contracts with Voiance and Geneva Worldwide to provide telephone interpretation and document translation services. The Department also utilizes internal staff volunteers to serve LEP customers. All Department staff that interacts with the public receives annual training on language access policies and procedures.

Language access goal	Milestones	Responsible staff	Deadline
Recruit additional internal bilingual volunteers	Information on how to become a volunteer will be provided during New Hire Orientation, Inspector training and other channels to be identified.	Language Access Coordinator and Human Capital Director	In progress
Create a stand alone training on Local Law 30 for all staff	Annual Local Law 30 training	Language Access Coordinator and Deputy Director of Customer Service	In Progress
Implement plain language guidelines and provide cultural sensitivity resources	Conduct focus groups with front line staff to provide guidance and receive feedback about language access experiences	Chief Customer Officer and Language Access Coordinator	In Progress
Expand outreach and availability of language access services at public events	Include information on invitations that interpretation services can be provided if the Department is notified prior to the event	Language Access Coordinator and Communications staff	In Progress
Provide communications to the public in the designated citywide languages, including emergency notifications, alerts, public hearings, events and press releases	An initiative of the language access committee	Language Access Coordinator and Communications staff	In Progress
Review 28.401.6 to determine if the Department is required to provide language services to licensees and registrants	Provide documents in a format that is compatible with the translation tool on nyc.gov	Language Access Coordinator and Communication staff	In Progress