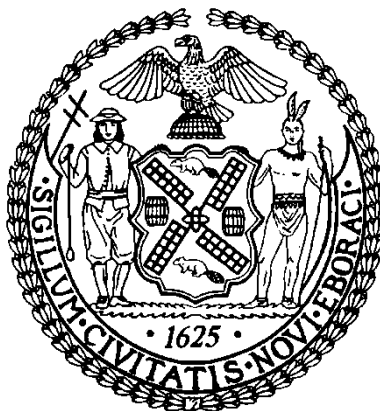


**CITY OF NEW YORK
OFFICE OF THE COMPTROLLER**

**John C. Liu
COMPTROLLER**

IT AUDIT and RESEARCH

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**A Study on the Compliance of
New York City Agencies
with Executive Order 120
and Recommendations for Enhancing
Citywide Language Access**

7R11-078S

November 26, 2010

<http://comptroller.nyc.gov>



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
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NEW YORK, N.Y. 10007-2341

John C. Liu
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November 26, 2010

To the Residents of the City of New York:

My Office conducted an audit on five City agencies' adherence to Executive Order 120 (EO 120), New York's "Citywide Policy on Language Access to Ensure Effective Delivery of City Services." EO 120 was established by Mayor Bloomberg in 2008 and requires all City agencies providing direct public services to ensure that limited English proficient (LEP) customers have meaningful access to City services.

Our audits illustrated that language access efforts can still be improved. The purpose of this study is, therefore, to:

- Summarize the results of the five audits of City agencies' adherence to EO 120 conducted by the Comptroller's Office.
- Expand on the audit recommendations by conducting research on best practices that can be applied to areas of service provision still in need of improvement.

As EO 120 calls for the Mayor's Offices of Operations and Immigrant Affairs to play a leadership role overseeing agencies' language access initiatives, we also included a review of Mayoral oversight in this study. We found that the Mayor's Offices have taken measures to promote compliance and expand language access. At the same time, we identified several areas where Mayoral oversight and analysis can also be strengthened.

We hope that agencies and the Mayor's Offices find this information useful for implementing their LEP programs.

If you have any questions concerning this report, please e-mail my audit bureau at audit@Comptroller.nyc.gov.

Sincerely,

John C. Liu

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TABLE 1 **Comparative Analysis of Municipal Language Access Laws**

APPENDIX I **Additional Language Access Resources**

*The City of New York
Office of the Comptroller
IT Audit & Research*

**A Study on the Compliance of
New York City Agencies
with Executive Order 120
and Recommendations for Enhancing
Citywide Language Access**

7R11-078S

I. EXECUTIVE SUMMARY

With more than 3 million foreign-born residents from more than 200 countries, New York City is home to one of the most diverse populations in the world. New Yorkers come from every corner of the globe and speak over 200 different languages. Nearly half of all New Yorkers speak a language other than English, and almost 25%, or 1.8 million, have limited proficiency in English. For these New Yorkers, interacting with City government can often be a challenge. As a strong proponent of civil rights, the Office of the New York City Comptroller is committed to non-discrimination and ensuring equal access to public services.

In 2003, a set of Council Members, including Comptroller Liu, who represented District 20 at the time, passed New York City Local Law 73 requiring social service agencies to accommodate customers with limited English proficiency (LEP). In 2008, Mayor Bloomberg established Executive Order 120 (EO 120), New York's "Citywide Policy on Language Access to Ensure Effective Delivery of City Services."

EO 120 requires all City agencies providing direct customer services to undertake a series of initiatives to ensure that LEP customers have meaningful access to City services. In doing so, EO 120 stipulates that each public-facing agency:

- Designate a Language Access Coordinator and develop and implement a Language Access Policy and Implementation Plan to accommodate LEP people.
- Conduct a population needs assessment.
- Train front-line staff.

- Establish a monitoring and measurement system.
- Conduct public outreach.
- Provide free language assistance based on at least the top six LEP languages¹ spoken in the City, including the identification and translation of essential public documents, telephonic and on-site interpretation services, and posting signage notifying the public of free language assistance.

Purpose of the Study

This study serves two primary purposes:

- The first is to summarize the results of the five audits of City agencies' adherence to EO 120 conducted by the Comptroller's Office and to highlight the recommendations for improvement identified in those audits.
- The second is to expand on the audit recommendations as a compilation of best practices, that if implemented, we believe will enhance direct access to services for LEP customers citywide. These enhancements include the best practices² we identified in our review of the Language Access Plans of the 38 New York City public-facing agencies (including the five we audited) as well as of other municipalities with language access policies.

Summary of Audit Results

Our Office has audited five of the 38 public-facing City agencies to determine whether these agencies were in compliance with EO 120. Specifically, we selected five agencies with diverse public service provision and impact:

- The New York City Civilian Complaint Review Board (CCRB).
- The New York City Commission on Human Rights (CCHR).
- The New York City Department of City Planning (DCP).
- The New York City Department of Transportation (DOT).

¹ Based on an analysis of U.S. census data, the top six LEP languages in New York City are: Spanish, Chinese, Russian, Korean, Italian, and Haitian Creole as determined by the New York City Department of City Planning.

² Best Practices are defined by the United States Government Accountability Office as the "processes, practices, and systems identified in public and private organizations that performed exceptionally well are widely recognized as improving an organization's performance and efficiency in specific areas."

<http://www.gao.gov/special.pubs/bprag/bprgloss.htm>

- The New York City Taxi and Limousine Commission (TLC).

We found that these agencies were generally in compliance with EO 120 and have taken reasonable measures to promote compliance and to expand language access to LEP customers. However, we found some agencies provided interpretation services, posted signage, and distributed translated essential documents inconsistently at various office locations. Public outreach could also be improved at some agencies and language access training could be formalized at others.

As the Executive Order calls for the Mayor's Offices of Operations (Operations) and Immigrant Affairs (MOIA) to play a leadership role overseeing agencies' language access initiatives, we also included a review of the Mayor's Offices' oversight efforts in our audit scope. We found that the Mayor's Offices have taken substantial measures to promote compliance and expand language access. At the same time, we identified several areas where Mayoral oversight and analysis can be strengthened.

Best Practices to Enhance Citywide Access for LEP Customers

We reviewed the LEP Plans of all 38 public-facing City agencies to identify tools and strategies practiced that could address the challenges identified in our audit of five agencies. In conducting our research, we also performed a comparative analysis of legislation in other municipal and local governments to assess how other cities and/or counties are approaching language access. We extended this research to include best practices we found upon reviewing other municipalities' language access plans and policies. These include:

- Washington, DC.
- Philadelphia.
- Town of Mattawa, Wash.
- City and County of San Francisco.
- City of Oakland, Calif.

The practices identified through the best practice research and comparative analysis are intended for all agencies to consider as they continue to implement their language access programs. We hope they will improve access to direct services for New York's LEP customers citywide.

Areas of agency compliance that we observed that could be strengthened and have been included in our research on best practices are:

- Delivery of Direct Public Service and Language Access Coordination.
- Population Needs Assessment and the Four-Factor Analysis.

- Direct Service Provision: Translation and Essential Documents.
- Direct Service Provision: Interpretation and Signage.
- Training.
- Public Awareness.
- Monitoring.

There were also several areas in which Mayoral oversight and analysis can be strengthened to help improve agency services to LEP customers. Enhancements include:

- Creating standards for translating documents and assessing the quality of vendors.
- Issuing guidance and conducting research on the use of automated online translation programs.
- Strengthening the monitoring of direct service provision by reinstating the original CORE program³ and developing self-assessment tools.
- Extending oversight beyond the current practice of reviewing short-term milestones by conducting more robust and long-term oversight of agencies' language access policies and procedures.
- Requiring agencies to develop an annual report of past accomplishments and future goals, including an evaluation of current practices.
- Enhancing citywide data analysis by expanding indicators included in the Mayor's Management Report.

Important Note

The practices highlighted from agencies outside of the five we included in our audits represent our interpretation of best practices and should be considered neither an evaluation nor necessarily a reflection of those agencies' compliance with or implementation of the programs, services, and initiatives discussed, nor are they all encompassing.

³ CORE, the Customers Observing and Researching Experience, is a survey conducted by the Mayor's Office to assess the quality of agencies' services without the service deliverers knowing they are being assessed. http://www.nyc.gov/html/ops/downloads/pdf/agency_services/core_final_report.pdf.

II. INTRODUCTION

A. Purpose of the Study

The ultimate goal of this study is to underscore and reaffirm the commitment of the City to safeguarding civil rights and ensure that language is not a barrier to the delivery of critical services to all New York City residents. The immediate objectives are to summarize the results of the five audits conducted in July and August 2010 regarding agencies' compliance with EO 120 and expand on the audit recommendations as a compilation of best practices for all agencies to consider. The compilation of audit results includes an analysis of the Mayor's Offices' oversight roles in monitoring agencies' compliance. The best research practice includes a comparative analysis of language access legislation enacted in other local governments.

We hope that this information will enhance language access for LEP populations citywide.

B. Glossary and Definition of Terms

Limited English Proficiency (LEP)

A person who has a limited ability to speak, read, write, or understand English at a level that permits him/her to communicate effectively in the course of applying for or receiving City services or benefits.

Essential Documents: Public documents provided to or completed by program beneficiaries and/or participants; those documents most commonly distributed to the public that contain or elicit important and necessary information regarding the provision of basic City services. These include complaint forms, notices of rights, claims, public outreach/awareness information, notices advising LEP persons of the availability of free language assistance, and others identified by each agency.

Executive Order 120: New York City's Citywide Policy on Language Access to Ensure Effective Delivery of City Services.

Interpretation: An interpreter works with spoken words to provide oral interpretation from one language into another. An interpreter is needed during phone or in-person conversations between a LEP customer and a City employee. For example, someone calls the Community Action Center speaking Russian; a Russian interpreter, or someone who speaks Russian fluently, is needed to communicate with that person over the phone.

Language Assistance Services: Interpretation (oral) and translation (written) services that allows multilingual employees (or external vendors) to communicate with LEP customers in their primary languages.

Language Line: The vendor with which the New York City Department of Information Technology and Telecommunications (DoITT) entered into a citywide contract to provide translation and interpretation services.

National Origin Discrimination: Different treatment based on a person’s inability to speak, read, write, and/or understand English; the language they speak; or a person’s ancestry.

Primary Language: The language in which a LEP individual communicates with others.

Translation: A translator transfers the meaning of written text from one language into another. Translation can occur on any form of written work, including brochures, notices, letters, emails, posters, and any other written document. For example, a translator is needed to translate a claim submitted in Spanish into English.

III. BACKGROUND

New York is home to one of the most diverse populations in the world. With more than 3 million foreign-born residents from over 200 countries, New Yorkers come from every corner of the globe and speak more than 200 languages. Nearly half of all New Yorkers speak a language other than English at home, and almost 25%, or 1.8 million people, have limited proficiency in English. For these New Yorkers, interacting with City government can often be a challenge. In response, in July 2008, Mayor Michael Bloomberg signed EO 120. EO 120 requires that all City agencies that provide direct public services ensure meaningful access to such services for people with LEP to communicate and receive services. EO 120 required that a language access policy and plan be developed and implemented by January 1, 2009, for each public-facing City agency.

A. Federal Language Access Initiatives

EO 120 has set a national example for municipalities across the country and builds on federal efforts to promote and protect language access. Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating based on national origin by, among other things, failing to provide meaningful access to individuals who are LEP. It also requires non-discrimination in federally assisted programs and activities, specifically stating:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

National origin non-discrimination was based on language established in the Supreme Court decision *Lau v. Nichols*, 414 U.S. 563 (1974), which validated that LEP individuals have the right to receive language assistance.

U.S. Presidential Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (65 FR 50121, 2000), requires federal funding recipients to:

- Examine the services they provide.
- Identify any need for services to LEP individuals.

- Develop and implement a system to provide LEP persons with meaningful access.

B. Oversight by Mayor's Office of Immigrant Affairs

MOIA spearheaded the City's LEP campaign. MOIA's role is to improve the life of the approximately 37% of New Yorkers who are foreign born and to bridge the gap between the immigrant community and the City government. MOIA has played a role crafting and advocating City policies, services, and programs to achieve this purpose. Subsequently, MOIA has become the de facto expert and provider of language access technical assistance to City agencies.

MOIA provides workshops and developed best practices for language access. Through these efforts, MOIA identified the need for uniform policies at all City agencies to help LEP individuals better access City services. EO 120 emerged as a result of these efforts. After EO 120 was established in 2008, the Mayor's Office of Operations became involved in language access oversight to facilitate a systematized process for implementing language access initiatives. Together, the two entities established citywide implementation strategies, which included the provision of technical support, monitoring, and guidance. Both Offices also work closely with the Department of Information Technology and Telecommunications (DoITT) to coordinate the technical side of implementation with City agencies, particularly foreign language communication through the contract of 311⁴ with Language Line.⁵

C. Oversight by Mayor's Office of Operations

Established by the City Charter, Operations is charged with planning, coordinating, and overseeing the management of City government operations; reviewing and reporting on the City's management organization; maintaining a management, planning, and reporting system; and making recommendations, when appropriate, for improving productivity and reducing operating expenses.

The Agency Services Group (ASG) was created in 2006 and is responsible for holding agencies accountable for enhancing the efficiency and quality of City services. ASG's efforts to enhance customer experiences with New York City government are always guided by the principles of *accessibility*, *transparency*, and *accountability*. In furthering these concepts, ASG strives to institute established standards that are core to good government and customer service, such as optimizing the use of resources, enhancing interactions with the public, ensuring clear accountability for outcomes, and maximizing information sharing. The wide array of projects and strong leadership provided by its various units are indicative of the value of the services being provided by the ASG.

⁴ 311 is New York City's one-stop phone number for government information and non-emergency services. 311 is the initial point of contact for customers seeking city services and often refers customers to various City agencies. <http://www.ci.nyc.ny.us/apps/311/about.htm>

⁵ New York City has a contract with Language Line, a resource that provides telephonic interpretation services allowing City staff to communicate with LEP customers in over 170 languages.

The Customer Service Group (CSG), in partnership with MOIA, plays a leadership role in each of the City’s language access initiatives. For example, CSG developed reports to track agency Language Access Plans. Each agency submits these reports to CSG, which then reviews submissions to monitor citywide compliance with EO 120 and provides agencies with feedback on their progress. CSG also developed training guidance on language access policies and procedures, certification, and cultural sensitivity, and spearheaded an online Language Access Portal to house essential translated agency documents in a central location.

IV. DISCUSSION OF AUDIT RESULTS FOR CITY AGENCIES

The Comptroller’s Office conducted a series of audits that reviewed compliance with EO 120. Five agencies were selected to be audited:

- The New York City Civilian Complaint Review Board (CCRB).
- The New York City Commission on Human Rights (CCHR).
- The New York City Department of City Planning (DCP).
- The New York City Department of Transportation (DOT).
- The New York City Taxi and Limousine Commission (TLC).

These five agencies were selected as a sample of agencies with a diverse range of service provision and public impact from among agencies that interface directly with the public and whose services shape the City through social and physical infrastructure development. We also wanted to avoid duplicating existing monitoring and research efforts such as those undertaken by the New York Immigration Coalition and Make the Road New York, two advocacy groups that recently released a report⁶ examining the compliance of several social service agencies with EO 120.

The results of the five audits are as follows:

A. Civilian Complaint Review Board Audit Findings and Conclusions

CCRB was generally in compliance with EO 120, where it is mandated that CCRB ensure meaningful access of agency resources to LEP persons. However, there are a few areas where CCRB was partially in compliance with EO 120, and its efforts should be enhanced to provide better services to LEP persons. Specifically, CCRB’s Language Access Policy and Implementation Plan is not timely; CCRB does not identify nor does it provide for the translation of essential public documents; CCRB’s front-line workers do not receive formal LEP training;

⁶ The Report, “Still Lost in Translation,” examined the compliance of the Human Resources Administration (HRA), Department of Housing Preservation & Development (HPD), and New York City Police Department (NYPD) with local language access laws. <http://www.thenyc.org/templates/documentFinder.asp?did=1232>

monitoring and measurement of language access services can be strengthened; and public outreach can be improved.

B. City Commission on Human Rights Audit Findings and Conclusions

CCHR was generally compliant with EO 120 and has pursued meaningful language access initiatives. However, there are several areas where efforts are in need of improvement. Specifically, CCHR does not post signage or utilize “I Speak” cards⁷ consistently across all sites; field office sites provide unsatisfactory on-site language assistance; customer-call interpretation services can be improved; translated publications can be distributed more consistently; public outreach can be strengthened; and training can also be strengthened.

C. Department of City Planning Audit Findings and Conclusions

DCP was generally in compliance with EO 120 in its mandate to ensure meaningful access of agency resources to LEP persons. However, there are a few areas in which DCP was partially in compliance with EO 120 where its efforts should be enhanced. Specifically, translations are often not very accurate when the Google translation tool is used to convert the content of website materials into different languages; DCP lacks documentation of LEP training; and there are weaknesses in interpretation and translation procedures, indicating that volunteers may need to go through a certification process such as NYCertified.⁸

D. Department of Transportation Audit Findings and Conclusions

DOT was generally compliant with EO 120 and has made substantial investments in providing meaningful language access to the agency’s services for LEP customers. However, there are several areas where efforts can be strengthened. We found, for instance, that DOT does not provide interpretation services at all sites. DOT’s Staten Island office, for example, was unable to provide basic information on interpretation services or deliver interpretation assistance (such as using Language Line or DOT’s Language Bank). Although DOT has translated many documents, essential documentation was only available in English at the six DOT sites we visited. As a consequence, LEP persons may not be aware of or given the opportunity to participate in a program or an activity, or to receive benefits or services from DOT at these sites.

E. Taxi and Limousine Commission Audit Findings and Conclusions

TLC was generally compliant with EO 120 and has pursued meaningful language access initiatives. However, there are several areas where efforts are in need of improvement. For example, TLC does not provide interpretation services consistently across all agency sites. TLC also does not adequately post signage, and its LEP Plan does not identify nor does it provide for translation of essential public documents. Additionally, TLC’s customer-call services for LEP persons are inconsistent and the agency’s public outreach can be strengthened.

⁷ “I Speak” cards are designed as a tool for staff to use upon initial contact with a LEP customer to identify the foreign language the person speaks, reads, or understands.

⁸ NYCertified is a citywide program for multilingual City employees who volunteer their language skills to provide translation and/or interpretive services to LEP customers.

V. ENHANCEMENTS FOR CITYWIDE COMPLIANCE WITH EO 120

A. Methodology

Our audits of EO 120 found that agencies are generally in compliance with the Executive Order and have taken reasonable steps to provide language access services. However, our audits also illustrated that there are still aspects of service provision where language access can be enhanced. As a result, we conducted best practice research that can be applied to areas of service provision that are still in need of improvement. This process was conducted in two steps.

The first step consisted of reviewing non-audited New York City agencies' language access plans. The Mayor's Office has determined there are 38 City agencies that are classified as "public-facing" for their provision of direct public services. Each of these agencies is held accountable for complying with EO 120 and has developed a Language Access and Implementation Plan. In an effort to assist these agencies to achieve meaningful access to LEP persons, we reviewed each agency's Language Access Plan. In doing so, we identified what we consider to be best practices based on our research and experience with conducting the EO 120 audits. The second step consisted of researching best practices found upon reviewing the language access legislation of other local governments; this comparative analysis is discussed in greater detail in section VI of this study.

The goal or purpose of this effort was to compile a set of practices, tools, and strategies that all agencies may want to consider implementing to improve language access initiatives and ultimately strengthen compliance with EO 120. These recommendations were also made in light of the limited resources currently available to agencies to invest in their Language Access Plans.

The criteria that we used in this analysis are listed below and correspond with the requirements outlined in EO 120. These criteria were prevalent across the five agencies we audited as areas in need of improvement that may apply to other agencies as well. They include:

- Delivery of Direct Public Service and Language Access Coordination.
- Population Needs Assessment and the Four-Factor Analysis.
- Direct Service Provision: Translation and Essential Documents.
- Direct Service Provision: Interpretation and Signage.
- Training.
- Public Awareness.
- Monitoring.

The following set of recommendations begin by stating what is required by EO 120 (italicized) in order to meet compliance with the Executive Order followed by a discussion of the

results found among the five agencies we audited. Finally, a set of corresponding best practices and the source agency for each practice are listed in bulleted format to address the challenges identified upon conducting our audits of EO 120.

These practices are intended to expand upon the recommendations identified in the audit reports. We hope that agencies find this information useful for implementing their LEP language access programs.

B. Review of Language Access Plans at 38 Public-Facing New York City Agencies and Other Local Governments

DELIVERY OF DIRECT PUBLIC SERVICE AND LANGUAGE ACCESS COORDINATION

EO 120 requires each agency to designate a Language Access Coordinator and to develop a Language Access Policy and Implementation Plan.

The five audited agencies complied with these provisions, but language access coordination can be further strengthened.

Designating a primary language access coordinator per agency is an effective approach for citywide coordination efforts. However, agencies that offer a number of different programs may require additional coordination efforts internally to achieve maximum compliance. Many agencies also fail to make information about the Language Access Coordinator publically accessible. For instance, we found it difficult to identify and to obtain contact information for agencies' language access coordinators without making a formal request. This information was rarely posted online, in offices, or in the respective agency's Language Access Plan. And while some agencies made formal announcements or issued policy statements about their Language Access Policy and Plan, this practice was inconsistent.

We recommend agencies consider the following measures in order to provide greater accountability and to achieve greater consistency among coordination efforts citywide:

- Issue a policy statement or directive from the agency Commissioner or highest ranking official communicating the agency's language access initiatives to the public and agency-wide. (NYC Department of Finance)
- Designate a language liaison (point person) for each work unit providing direct public service to support and liaise with the agency's primary Language Access Coordinator. (NYC Department of Small Business Services; City of Philadelphia)
- Post the name and contact information of the Language Access Coordinator (and Language Liaisons if applicable) online, in offices, and in the agency's Language Access Plan. (NYC Department of Small Business Services; City of Philadelphia)

- Have the Language Access Coordinator report directly to the agency's Commissioner. (City of Philadelphia)
- Hire bilingual employees in public contact positions; publicize job openings for public contact positions in non-English language media; and make bilingual conversational proficiency a job requirement, as applicable. (City of Oakland, Calif.)

POPULATION NEEDS ASSESSMENT AND THE FOUR-FACTOR ANALYSIS

EO 120 provides that each agency shall have flexibility in determining appropriate language assistance, and to develop its Language Access Policy and Implementation Plan by undertaking the four-factor analysis issued by the U.S. Department of Justice.⁹

The five agencies we audited were compliant in utilizing the four-factor analysis and often used data from the Department of City Planning (DCP) as a baseline to conduct an assessment of agency language needs. Additionally, there are other sources of data agencies can use to determine changing demographics and customize service provisions that best meet their clients' needs.

We recommend agencies consider integrating some of the following measures into their needs assessment to customize service based on each agency's unique language needs:

- Survey staff about language access needs.
- Conduct customer surveys of language preferences (if resources are available).
- Collaborate with community-based partners.
- Track internal language assistance requests (written, in-person, or telephonic). (Cities of Philadelphia and San Francisco)

DIRECT SERVICE PROVISION: TRANSLATION AND ESSENTIAL DOCUMENTS

*EO 120 requires that the identification and the translation of essential public documents¹⁰ be provided to or be completed by program beneficiaries and/or participants.**

⁹ The Four-Factor Analysis (<http://www.lep.gov/faqs/faqs.html>):

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
2. The frequency with which LEP individuals come in contact with the program;
3. The nature and importance of the program, activity, or service provided by the program to people's lives; and
4. The resources available to the grantee/recipient or agency, and costs.

¹⁰ EO 120 defines essential documents as those documents most commonly distributed to the public that contain or elicit important and necessary information regarding the provision of basic City services (Section 2d.i).

We observed inconsistencies in implementation of the essential documents provision of the Executive Order among the five agencies we audited. Agencies frequently cited limited resources as a barrier to translating essential documents. Often agencies made the investment in translating essential documents, but they did not ensure that the documents were distributed across various office sites to be made accessible to LEP customers.

We recommend agencies consider the following resource-friendly strategies:

- Develop protocols to ensure that all office sites have adequate supplies of translated materials. One suggestion includes having electronic versions available to download and print on an as-needed basis, and ensure that customers are aware of this practice.
- Use a multilingual tagline¹¹ (translated in applicable languages) about how to access free language assistance and/or offer sight translation (an oral explanation of the information).

Examples include: “Important: If you need help reading this, call 1-800 for a free interpreter to help” or “Please call the Language Service Unit at 1-800 for an oral interpretation of this document in other languages” (NYC Administration for Children’s Services; NYC Housing Authority; City of Philadelphia).

- To ensure consistency and streamline the translation process, develop a standard glossary of terms commonly used by the agency as well as style a guide to share with external translation companies, vendors, and Language Bank volunteers (NYC Administration for Children’s Services).
- Make documents available that state and federal agencies have translated (NYC Administration for Children’s Services, City of Oakland, San Francisco).
- Simplify document translation and signage by using symbols or graphics instead of text, as applicable. (NYC Department of Parks and Recreation).

*** A Note on Automated Translation Services**

While not an explicit requirement of EO 120, many agencies have invested in automated online translation programs to assist LEP customers’ access website materials. Google Translate and Yahoo! Babel Fish are two examples of programs commonly used by agencies. Google Translate scored the highest in an evaluation of different machine translation technologies conducted by the U.S. National Institute of Science and Technology.¹² Other research has shown that users are more likely to select companies they may be more familiar with due to branding

¹¹ A tagline in this context refers to a brief statement often at the top or bottom of a document intended to promote and reinforce the accessibility of an agency’s programs and services by providing key information such as how to contact the agency in multiple languages and access language assistance services.

¹² Note: This evaluation should not be interpreted as a product-testing exercise, and the results should not be used to make conclusions regarding which commercial products are best for a particular application. <http://www.itl.nist.gov/iad/mig/tests/mt/2009/>

such as Google over other lesser-known software. But the research also shows that ultimately no single translation program will consistently be effective for all languages, as different programs have varying rates of accuracy, depending on the language, application, and length of text.¹³

These types of services are free and useful for translating basic information. However, their accuracy is often limited. Therefore, efforts should be made to ensure these tools are used appropriately by agencies, and that they are phased out as more credible online translation tools and/or additional resources become available.

Additionally, the use of automated translation systems should:

- Be accompanied by a multilingual disclaimer informing customers about the limited accuracy of the tool (the disclaimer should include contact information to request language assistance).
- Be used to translate basic written communication only.
- Not be used to translate essential public documents or legal information.

DIRECT SERVICE PROVISION: INTERPRETATION AND SIGNAGE

EO 120 requires agencies to provide interpretation services, including the use of telephonic interpretation services, for the top six languages and others as appropriate. EO 120 also states that agencies are to post signage in conspicuous locations notifying the public of the availability of free interpretation services.

The results of our five audits found that the agencies did not consistently provide satisfactory or consistent delivery of language assistance services. This included on-site language assistance (in-person interpretation); call center services (telephonic interpretation); and posting of signage notifying customers about the availability of free interpretation services. This was particularly true of agencies that have not invested in Language Line.

We recommend agencies consider the following enhancements:

- Invest in Language Line and “I Speak” cards both at office sites as well as while participating in community outreach or when conducting field visits and make cell phones available for caseworkers or other staff working outside the office (NYC Administration for Children’s Services).
- Develop a “reference sheet” or “job aid” to assist front-line staff using Language Line or other language access tools to provide language assistance services (NYC TLC).

¹³ TC World, “Comparison of Online Machine Translation Tools,” article by Ethan Shen, June 2010 www.teworld.info/index.php?id=175

- Provide interpreter services via conference call if bilingual staff are at different office sites (NYC CCHR).
- Advertise and provide interpreters at public meetings if requested at least 48 hours in advance (City of Oakland).
- Provide voicemail recording and Interactive Voice Response (IVR) messages in foreign languages (NYC DEP; City of San Francisco).

TRAINING

EO 120 calls for the training of front-line workers and managers on language access policies and procedures.

The five agencies we audited have all conducted training programs and have developed protocols for basic service provision. But we did note opportunities for improvement. The results of our audits illustrated that training could often be strengthened, formalized, and reinforced.

Agencies may want to consider:

- Participating in *NYC Cultural Appreciation*, a cultural sensitivity model provided through the Citywide Training Center at the initiative of MOIA (NYC Mayor's Office).
- Developing or obtaining videos for staff to learn how to effectively use Language Line and other language access tools or developing effective techniques for providing language assistance services (NYC Administration for Children's Services).
- Incorporating quality control protocols into training modules and requiring bilingual staff to undergo certification and specialized training (City and County of San Francisco; Town of Mattawa).

PUBLIC AWARENESS

EO 120 calls for the creation of appropriate public awareness strategies for agencies' service populations.

In conducting our five audits, we found many agencies have taken substantial efforts to provide language assistance and engage in community outreach. However, we note that agencies could make stronger efforts to ensure that LEP customers are made aware that these services are available, whether on an ongoing basis or for specific public events or meetings. We also observed that agencies tend to lack adequate materials or written communication documenting and formalizing their outreach efforts to the LEP community.

We recognize that many agencies are unable to advertise public events in foreign languages due to the restrictive costs of translating materials. There are, however, cost-effective ways of promoting public awareness to LEP customers:

- Post notices in public service areas and add tag lines on agency documents, the agency's content on the City website, telephone answering machines and other media systems (City of Philadelphia).
- Work with community-based organizations to provide language assistance and to distribute promotional and outreach materials and information about public events to LEP communities (NYC CCRB).
- Use local media, such as Spanish language newspapers and radio stations, and events well attended by LEP Hispanics, for example, to publicize the availability of language assistance services (Town of Mattawa).

MONITORING

EO 120 calls for the establishment of an appropriate monitoring system regarding the provision of agency language services.

All five audited agencies submitted quarterly reports to the Mayor's Office. But each has different timetables and requirements for internal monitoring and self-assessment. Some agencies update their Language Access Plans on a regular basis, but others lack definitive timeframes for doing so. In the course of conducting our audits, we observed occasional discrepancies between information stated in the Language Access Plan and information provided during interviews with Language Access Coordinators. We also found some agencies did not readily update their plans regarding changing demographics when new language populations had been identified. Ultimately, we recognize that agencies have limited and varying amounts of resources that account for inconsistent levels of monitoring and quality assurance citywide. We believe opportunities to improve monitoring lie with agencies undertaking stronger quality assurance measures or self-assessment processes.

Given these observations, there are a number of measures agencies can take to strengthen monitoring:

- Develop regular timeframes for reviewing and updating the Language Access Plans.
- Develop an annual year-end summary report of progress made in complying with EO 120. This study will include an assessment of accomplishments or challenges, and future plans with new milestones, initiatives, and goals (NYC DOT; City of San Francisco).

- Conduct self-assessments on a yearly basis to identify procedural or policy changes and follow up through staff training (Cities of Oakland and San Francisco).
- Develop a quarterly reporting system for field sites or public-service work units on language services data to track and monitor trends in utilization of services and identify gaps in access where corrective action needs to be taken (NYC Health & Hospitals Corporation).
- Require bilingual staff to have their language skills assessed by a professional interpreter (Town of Mattawa).
- Require agencies that provide services through contracted services to establish and to enforce language access policies and compliance (City of Philadelphia).

C. Oversight Enhancements: Mayor’s Offices of Operations and Immigrant Affairs

Since the execution of EO 120 in 2008, the Mayor’s Office has undertaken substantial measures to provide resources and technical assistance to agencies to achieve compliance with the Executive Order. For example, the Mayor’s Office of Operations has:

- Invested in a quarterly reporting system to monitor agencies’ progress in implementing their language access plans and developed quality assessment tools such as the Customers Observing and Researching Experience (CORE) program to monitor service provision.
- Established regularly scheduled Language Access Coordinator meetings for agencies to share information, learn about new language access initiatives, tools, resources, and to foster collaboration to achieve the objectives in EO 120.
- Developed tools to facilitate the exchange of information and resources, such as setting up a citywide contract with Language Line. More recently, it established NYCertified, a volunteer-based program that assesses employees proficient in foreign languages and offers them training on how to provide quality translation and interpretation services, which are then made available citywide.
- Created resources such as the Language Access Gateway, an online and centralized portal for translated documents designed to foster partnership between city agencies and community-based organizations serving LEP communities.
- Developed training materials that include policy and procedural guidelines as well as cultural sensitivity issues.

We would like to recognize and build on these efforts. We do so by offering the following set of enhancements for the Mayor’s Office to consider with the goal of strengthening

data analysis that will produce additional information to augment decision-making, resource allocation, and strategic planning at a citywide level.

The following enhancements build on the recommendations outlined in the “Other Issues” section of the EO 120 audit reports. These enhancements are structured by the same criteria and components required in the Executive Order, like the best practices in section IV-A:

- Delivery of Direct Public Service and Language Access Coordination.
- Direct Service Provision: Translation and Essential Documents.
- Direct Service Provision: Quality Assurance.
- Monitoring and Oversight.

DELIVERY OF DIRECT PUBLIC SERVICE AND LANGUAGE ACCESS COORDINATION

Many agencies are housed in buildings that require members of the public to pass through security upon entering the building. Some agencies, such as CCHR, provide security guards with tools such as “I Speak” cards and work with security staff to ensure that LEP customers are able to access their buildings. Other agencies expressed concern that security check points were out of their control and provided no tools to assist LEP customers through the security process to enter their buildings. We are concerned that security checkpoints may pose a barrier to LEP customers trying to access public buildings in situations where security staff are not informed, trained, or equipped with the proper tools to assist and accommodate LEP customers.

We recommend that the Mayor’s Office take the following steps regarding language access at security desks or checkpoints:

- Follow up with the Department of Citywide Administrative Services to ensure that security staff members are aware of their responsibilities to provide access to LEP customers. Ensure that appropriate protocols are in place so security staff are equipped to meet this need. Ensure that adequate communication is taking place between DCAS and agencies in public buildings to achieve maximum efficiency and quality service provision when engaging LEP persons.

We also noted during the course of conducting the EO 120 audits that there is currently no comprehensive tracking system of vendors contracted by agencies to provide direct services to LEP persons. The only vendor currently tracked by the Mayor’s Office is Language Line. There is no guidance on vendors’ responsibilities regarding providing language assistance services. Creating a centralized tracking system would ensure that all vendors providing language assistance services to LEP persons are monitored.

We suggest that the Mayor’s Office consider the followings initiatives regarding language access required by vendors and contracts:

- Provide guidance on vendor responsibilities regarding language access requirements outlined in EO 120.
- Track agency use of language assistance for vendors and create a central database or list of vendors that provide direct services to the public and thus must offer language assistance to LEP persons.

DIRECT SERVICE PROVISION: TRANSLATION AND ESSENTIAL DOCUMENTS

During the course of the audits, there were a few instances in which we observed discrepancies between the documents agencies submitted to the Mayor's Office for inclusion on the Language Access Gateway¹⁴ and the actual documents posted. Several steps could be taken to improve monitoring to ensure the Language Access Gateway is kept up-to-date.

Based on our observations and research, we suggest that the Mayor's Office consider the following to strengthen assistance regarding the Language Access Gateway:

- Take periodic inventory of the current documents posted on the Gateway to ensure they match those documents provided by agencies.
- Track the frequency of hits on the Language Access Gateway for various documents, agencies, and languages to assess what resources are most critical or most frequently utilized, and to determine if additional outreach is necessary.

We also recommend the Mayor's Office consider the following steps to strengthen assistance regarding translation services more broadly:

- To more effectively serve LEP customers and to provide for efficient service delivery by agencies, we encourage the Mayor's Office to provide guidance on standards for assessing the quality of vendors that provide translation services to agencies. There is currently no standard set of guidelines or criteria for agencies to follow in order to evaluate and to select high quality language assistance vendors that provide translation services. We received feedback from agencies in the course of the audits that some vendors provided poor quality translation services that required agency staff to repeat the translation effort so as to serve the LEP customer.

Lastly, we encourage the Mayor's Office to provide guidance regarding the use of automated online translation services for web-based translation services:

- Certain agencies have implemented free machine translation systems on their websites, such as Google Translate and Yahoo! Babel Fish. However, not all

¹⁴ The Language Access Gateway is an online portal developed by the Mayor's Office that houses agencies' essential documents that have been translated into other languages
<http://www.nyc.gov/html/lg/html/about/about.shtml>

agencies have done so. Moreover, there is a wide consensus about the limited accuracy of these translation tools among the agencies that have used them. In that regard, we encourage the Mayor's Office to develop guidelines to assist agencies in making informed choices about the use of translation technologies. The guidelines would help agencies determine whether to make an investment in this type of technology; evaluate different providers of this service; determine whether they should include a disclaimer; and determine the appropriate application and appropriate use of these programs. We also encourage the Mayor's Office to conduct research and inform agencies about long-term solutions for more accurate and affordable automated online translation services.

DIRECT SERVICE PROVISION: QUALITY ASSURANCE

A consistent observation during our audits was that agencies have made initial and often substantial investments in tools, procedures, and resources to put a language access framework firmly in place. However, we also observed the quality of actual service provision was often inconsistent, and the implementation of procedures can use improvement.

Based on these observations, we encourage the Mayor's Office to consider enhancing training requirements in order to improve implementation of direct language assistance:

- We understand the need for agencies to develop flexible policies and procedures for service provision. But agencies can probably improve direct service by formalizing training modules and by offering employees additional or annual training opportunities.

Given these observations, we also identified the need for more robust quality assessment.

The audit teams found the Mayor's Office's CORE program¹⁵ a useful tool for meeting this need by monitoring agencies' direct service provision on the front lines of customer service. Initially, this program gauged agency provision of LEP customer service by assessing the availability, quality, and length of wait time for interpreter services, both in person through bilingual employees and telephonic interpretation, as well as the availability of translated documents and multilingual signage.

We had considered using the results of the 2008 CORE Report (conducted the same summer that EO 120 was executed) as a baseline assessment for our audits. However, we were disappointed to learn that the CORE program had changed and that subsequent iterations of the program do not replicate the comprehensiveness found in the original model. In fact, the new model assesses only signage. Removing assessment of the interaction of customer service employees with the public from the evaluation model, in our opinion, significantly weakens the usefulness of the data in the report. Thus, the ability to use this report to monitor compliance is compromised. This is particularly troublesome given the low scores that language access

¹⁵ Secret shopping provides a tool for assessing quality of service without the service deliverers knowing they are being assessed http://www.nyc.gov/html/ops/downloads/pdf/agency_services/core_final_report.pdf

received compared to the other areas of customer service monitored as part of the CORE program and the results of our audits.

We encourage the Mayor's Office to consider the following suggestions regarding the CORE Program to improve agencies' implementation of direct language assistance:

- Restructuring the CORE program to expand beyond signage for assessing customer service procedures for communicating with LEP customers.
- Measuring the same indicators included in the original CORE program and consider use of the first report as a baseline for future assessments.
- Developing a baseline set of standards, criteria, or guidelines for appropriate use of language bank volunteers for different types of language assistance services.

MONITORING AND OVERSIGHT

The audit team also made a series of general observations about current oversight practices.

For example, we are concerned that there is a lack of long-term monitoring and oversight. Specifically, we are concerned about Operations' current practice of discontinuing oversight of specific initiatives once a milestone has been reached, and about the status of milestones not being tracked at an aggregate level. We recognize that the most recent Quarterly Report (Q2 2010) included newly added milestones (LEP customer surveys, testing/training of bilingual employees, Language Access/Cultural Sensitivity Training, Signage and Tools, and Outreach), which are a step in the right direction. Some of these initiatives are discrete, one-time efforts, while others are ongoing and continuous, which reinforces the need for long-term oversight of milestones to ensure ongoing and consistent compliance is happening.

Another area of concern that the audit team discussed from the results of the audited agencies is the Mayor's Offices' lack of enforcement authority should agencies fail to submit quarterly reports, have poor attendance at Coordinator meetings, or be generally non-compliant.

We therefore suggest that the Mayor's Office consider the following oversight initiatives:

- Enhance the current Quarterly Report model to distinguish between short-term milestones that represent discrete steps in achieving long-term compliance versus ongoing compliance activities, and design a mechanism to monitor continual effectiveness over time.
- Monitor ongoing implementation of initiatives even after they reach a milestone.

- Require each Plan to state the date it was created and ensure that milestones have definitive timeframes to ensure that core components of monitoring service delivery and procedures for communicating with LEP customers are up to date and reflect current trends.
- Encourage and provide guidance and tools for agencies to conduct self-assessments.

The following examples are practices employed by other city agencies with language access initiatives that the New York City Mayor's Office may want to consider to address some of the challenges discussed:

- Washington, DC's Language Access Act requires District agencies, departments, and programs to update language access plans every two years (and include an evaluation and assessment of the adequacy of services provided).
- The Oakland City Manager is granted the authority under its Equal Access to Services Ordinance to enforce provisions of the ordinance and assure compliance if it is determined that a department is not complying.
- Mattawa's Language Assistance Plan requires employees to participate in language access training every two years in addition to providing training for new employees.

➤ **DATA COLLECTION AND ANALYSIS**

EO 120 calls upon agencies to establish an appropriate measurement system regarding the provision of agency language services. The agencies we audited meet this requirement through completing the quarterly reports required by the Mayor's Office. However, we noted that there are additional indicators that various agencies collect beyond what was required by Operations. While this is encouraging, we were disappointed to discover that the data collection is not more comprehensive at the citywide level. Therefore, there are very few language access indicators included in the Mayor's Management Report (MMR).

We are also concerned by the inconsistencies among the data various agencies collect and the implications this has for ensuring a consistently high level of the quality of service provision.

We therefore encourage the Mayor's Office to consider the following measures to enhance data collection and analysis:

- Examples of indicators Operations may want to institute on a citywide basis include:
 - Number of language assistance requests made per office for each agency;
 - Number of language assistance requests made per work unit within an agency;

- Number of requests by type of language assistance service provided (telephonic interpretation; in-person interpretation; email and written communication; and interpreters requested for public meetings and hearings);
 - Tracking complaints made in other languages or relating to language access;
 - Comparing the use of internal telephonic services, language bank volunteers, Language Line, and 311 (collect and analyze billing information);
 - Number and proportion of staff with access to and training on Language Access procedures such as Language Line or other interpreter services;
 - Number of times a customer declined language service or was not accommodated;
 - Length of time for various types of languages assistance services provided.
- Incorporate complaints made in foreign languages or relating to language access into data collection systems and revisit the MMR coding system to allow for more detailed reporting or querying to ensure complaints are tracked and not duplicated.

VI. COMPARATIVE ANALYSIS: A REVIEW OF LANGUAGE ACCESS POLICIES AND PLANS OF OTHER MUNICIPALITIES

There are four municipal governments other than the City of New York that have established language access legislation,¹⁶ according to the Federal Interagency Website on Limited English Proficiency: Washington, DC; City of Philadelphia; Town of Mattawa, Wash.; and the City and County of San Francisco. Additionally, we found that the City of Oakland, Calif., also has a local language access ordinance.

We conducted a comparative analysis of these other municipalities' language access legislation as part of our research to learn how other cities have approached language access, particularly given limited resources. This information was incorporated into this study in two different ways.

The first approach was reviewing these municipalities' local language access policies and plans to identify best practices that could address challenges New York City agencies may be facing. These practices have been integrated into the best practices discussed in section IV-B of this study along with enhancements identified upon reviewing all public-facing New York City agencies' Language Access Plans. The second approach was comparing how each of these municipalities addresses different components of language access. This analysis was broken down by the same categories as the best practices section and the review of the New York City Mayor's Office. A summary of this information is in Table I below.

¹⁶ <http://www.justice.gov/crt/lep/resources/resources.html>

TABLE I Comparative Analysis of Municipal Language Access Laws

Municipal Comparative Analysis	New York City	City of Philadelphia	Washington, DC	City & County of San Francisco	City of Oakland, Calif.	Town of Mattawa, Wash.
Local Legislation (year passed)	Executive Order (2008)	Directive (2007); Executive Order (2001, 2008)	Act (2004)	Ordinance (2001)	Ordinance (2001)	Resolution / Agreement (2006); Memorandum of Understanding; Plan
Delivery of Direct Public Service (covered agencies)	All public-facing city agencies	Directive: All city operating departments EO: All city departments, agencies, boards and commissions	District government programs, departments, and services with major public contact	All city departments must provide LEP services, Tier 1 departments (high volume of public interaction) have additional requirements	All city agencies, but implemented in phases for different tiers of agencies based on level of public interaction	Plan: all town services and benefits, all programs and activities of the police department
Language Access Plan	Covered agencies are required to develop and implement agency-specific language access policy and implementation plans	Covered entities and the Office of the Managing Director are required to develop, update, and implement written language access plans, policies, and protocols	Covered entities are required to establish and implement a language access plan	Each Tier 1 department is required to draft an Annual Compliance Plan	Departments are required to develop Compliance Plans, The City Manager also submit an annual compliance plan to the City Council each year	Developed a joint plan for the town and police department
Language Access Coordination	Each agency designates a language access coordinator	Departments designate global “Ambassadors” and Language Liaisons	District government programs, departments, and services designate language access coordinators	Departments designate Language Liaisons	The City Manager is responsible for monitoring and facilitating compliance with the ordinance.	Language Access Committee

Municipal Comparative Analysis	New York City	City of Philadelphia	Washington, DC	City & County of San Francisco	City of Oakland, Calif.	Town of Mattawa, Wash.
Population Needs Assessment	DOJ Four-Factor Analysis	5% or 1,000 of the LEP population, whichever is less	3% or 500 individuals, whichever is less of the LEP population, DOJ Four-Factor Analysis	Annual review of 5% or more of those LEP customers using the department's services	At least 10,000 LEP City residents	Assess demographic data and consult with community groups
Covered Languages	Top 6 languages spoken citywide (Spanish, Chinese, Russian, Korean, Italian, and Haitian Creole)		Spanish, Chinese, Vietnamese, Korean, French, and Amharic			
Translation	Vital public documents	Vital public documents; multilingual taglines; and review of website content	Vital documents	Vital public documents, recorded phone messages	Vital information, making state/federal translated documents available	Vital documents, complaints
Interpretation & Signage	Agencies are required to provide interpretation services, including telephonic services	Identify existing bilingual staff and city contracts for in-person and telephonic interpretation	Interpretation services: bilingual staff; contracts; and community service groups			
Training	Front-line workers and managers	Ongoing and regular		Employee professional development, quality control for bilingual employees	Bilingual conversational proficiency a job requirement for public contact positions	Staff participate in training every two years, special training for new employees

Municipal Comparative Analysis	New York City	City of Philadelphia	Washington, DC	City & County of San Francisco	City of Oakland, Calif.	Town of Mattawa, Wash.
Monitoring System (Oversight)	Monitoring and measurement system required	Periodic reporting and monitoring; performance measures; and quality assessment	Plans to be updated every two years and include an evaluation of service provision	Departments required to provide a narrative assessment of LEP procedures in annual compliance plan	City manager reviews department compliance plans and enforces compliance, city council must approve plans	Mayor and police chief review plans, consult with language access committee, and consult CBOs every 6 months
Measurement System (Data Collection & Analysis)	Monitoring and measurement system required	Data collection, administrative procedures, and monitoring to inform needs assessment and priority setting	Collect language data annually and use databases and tracking applications for data collection	Conducts annual survey of public contact; analyze intake data; and track language requests and vendor billing data	Biannual reports regarding number, nature, and status of language access complaints	Review contracted language assistance utilization data; radio logs and police reports; and record keeping system also in place
Public Awareness & Notice of Language Assistance	Posting of signage in conspicuous locations notifying right to free language assistance	Public advertising, outreach, posted notices, tag lines, multilingual media; website content; and phone messages	Periodic public meetings with other offices and/or coalitions that work with LEP groups	Inform LEPs of right to free assistance, provide oral interpretation at public meetings if requested within 48 hours	Outreach to inform LEPs of their rights; post notices in public areas; and maintain recorded telephonic messages	Utilize local media like Spanish newspapers and radio stations, and post signs in public locations
External Oversight	Mayor's Office of Operations and Mayor's Office of Immigrant Affairs	Managing Director, Director of Multicultural Affairs	Office of Human Rights (collaborates with Offices of Latino Affairs, Asian and Pacific Island Affairs, and African Affairs)	Immigrants Rights Commission, and Office of Civic Engagement & Immigrant Affairs	Oakland Equal Access Office	Mattawa Language Access Committee in consultation with community-based organizations

APPENDIX I ADDITIONAL LANGUAGE ACCESS RESOURCES

- Executive Order 120 (MOIA Web site):
http://www.nyc.gov/html/imm/downloads/pdf/exe_order_120.pdf or (Operations)
http://home2.nyc.gov/html/ops/html/customer_service_group/language_access_plans.shtml
- List of New York City Agency Language Access Plans (MOIA website):
<http://www.nyc.gov/html/imm/html/executive/eo120.shtml>
- New York City Local Law 73:
http://www.nyc.gov/html/imm/downloads/pdf/language_access_law.pdf
- New York City Language Gateway Portal:
<http://www.nyc.gov/html/lg/html/english/english.shtml>
- Mayor's Office of Operations Customer Service Group, Customers Observing and Researching Experience (CORE) Program:
http://www.nyc.gov/html/ops/html/customer_service_group/customer_service_group.shtml
- New York City Office of Operations 2009 Agency Service Annual Report:
http://www.ci.nyc.ny.us/html/ops/downloads/pdf/agency_services/annual_report_09.pdf
(See pages 42 and 44 for language access-related information)
- New York City Mayor's Office of Operations Customer Service Newsletter, which contains references and articles relating to various language access initiatives:
http://www.nyc.gov/html/ops/html/customer_service_group/customer_service_group.shtml
- The New York City Immigration Coalition and Make the Road, Language Access Report, and other resources: <http://www.thenyic.org/issue.asp?cid=76> and
http://www.maketheroad.org/pix_reports/MRNY_Still_Lost_in_Translation_July_2010.pdf
- New York City Department of City Planning LEP Data:
<http://home2.nyc.gov/html/dcp/html/about/language.shtml>
- Federal Interagency website for Limited English Proficiency:
www.lep.gov
- US Department of Justice LEP Tips & Tools from the Field
http://www.lep.gov/guidance/tips_and_tools-9-21-04.htm
- Executive Order 13166: <http://www.lep.gov/13166/eolep.htm>
- Title VI of the Title VI of the Civil Rights Act of 1964:
<http://www.usdoj.gov/crt/cor/coord/titlevi.php>

- Census 2000 Brief on Language Use and English-Speaking Ability
<http://www.census.gov/prod/2003pubs/c2kbr-29.pdf>
- Links to legislation cited in the comparative analysis:

Municipal Government	Legislation and Link
Mattawa, Wash.	<i>Resolution for the Provision of Interpreter Services (2006)</i> http://www.justice.gov/crt/lep/resources/2008_Conference_Materials/MattawaResolution.pdf <i>Memorandum of Understanding and Language Assistance Plan</i> http://www.nyc.gov/html/imm/html/executive/eo120.shtml
New York City	<i>Executive Order 120 (2008):</i> http://www.nyc.gov/html/imm/html/executive/eo120.shtml <i>Local Law 73 (2003):</i> http://www.nyc.gov/html/imm/downloads/pdf/language_access_law.pdf
Oakland, Calif.	<i>Equal Access to Services Ordinance</i> http://www2.oaklandnet.com/oakca/groups/cityadministrator/documents/translatteddocument/dowd002555.pdf
Philadelphia	<i>Managing Director's Office Directive 62: Language Access Policy & Plan for Operating Departments (2007)</i> http://www.justice.gov/crt/lep/resources/2008_Conference_Materials/PhiladelphiaMDO62memo.pdf
San Francisco	<i>Equal Access to Services Ordinance (2001)</i> http://www.justice.gov/crt/lep/resources/2008_Conference_Materials/SanFranciscoEASOrdChap91.pdf
Washington, DC	<i>Language Access Act of 2004</i> http://www.justice.gov/crt/lep/resources/2008_Conference_Materials/DCLanguageAccessActof2004.pdf