

City of New York

OFFICE OF THE COMPTROLLER

Scott M. Stringer COMPTROLLER



AUDITS & SPECIAL REPORTS

Marjorie Landa

Deputy Comptroller for Audit

Audit Report on the Compliance of New York City Emergency Management with Local Law 30 Regarding Access to City Services for Residents with Limited English Proficiency

SZ18-129A May 21, 2019 http://comptroller.nyc.gov



THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER SCOTT M. STRINGER

May 21, 2019

To the Residents of the City of New York:

My office has audited New York City Emergency Management (NYCEM) to determine whether NYCEM is in compliance with Local Law 30, which requires that City agencies providing direct or emergency services to the public create a language access implementation plan and to ensure meaningful language access to their services. According to the New York City Department of City Planning, nearly one-half of all New Yorkers speak a language other than English at home, and almost 25 percent of City residents age five and over, or 1.8 million persons, are not proficient in English. For residents with limited English proficiency, interacting with City government can often be a challenge. We audit City agencies such as NYCEM to help ensure that they are complying with applicable laws and regulations and that they are providing residents access to important City services.

The audit found that NYCEM generally complied with Local Law 30. Our review of NYCEM's Language Access Plans from 2008 through 2018 found that NYCEM has made continuous progress to provide meaningful language access to the agency's services for City residents with Limited English Proficiency (LEP). Its Language Access Plans described the steps that NYCEM has taken to provide its services to the LEP population. Overall, we found that NYCEM provides these services during emergencies in 13 languages, including the top 10 New York City LEP languages. Further, we found that through City-wide contracts with language vendors (Language Line Services, LLC and Geneva Worldwide, Inc. used in connection with 311, Voiance used for telephonic services, and aLanguageBank used for translation services), NYCEM has the ability to provide documentation, translation, Communication Access Real Time Captioning, American Sign Language Video Remote Interpretation, and phone interpretation services in over 100 languages.

The report recommends that NYCEM should continue to adhere to Local Law 30 to ensure that it adequately meets the language needs of the communities it serves.

The results of the audit have been discussed with NYCEM officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report.

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

Sincerely. Scott M. Stringer

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THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER AUDITS & SPECIAL REPORTS

Audit Report on the Compliance of New York City Emergency Management with Local Law 30 Regarding Access to City Services for Residents with Limited English Proficiency

SZ18-129A

EXECUTIVE SUMMARY

In 2017, the New York City Council enacted Local Law 30, effective July 1, 2017, which requires City agencies that provide direct public services or emergency services to have a language access plan that allows residents meaningful access to City services regardless of their proficiency in English. These translation services must be provided in the top designated Citywide languages, which includes the top six limited English proficiency languages spoken by the population of New York City as determined by the Department of City Planning and the Mayor's Office of Language Services Coordinator, and the top four limited English proficiency languages spoken by the population served or likely to be served by the agencies of the City of New York.

This audit focuses on whether New York City Emergency Management (NYCEM)¹ complied with Local Law 30. NYCEM is responsible for the coordination of City-wide emergency planning and response for all types and scales of emergencies. Its staff consists of over 200 professionals from diverse backgrounds and areas of expertise, including individuals assigned from other City agencies.

Audit Findings and Conclusion

We found that NYCEM generally complied with Local Law 30. Our review of NYCEM's Language Access Plans from 2008 through 2018 found that NYCEM has made continuous progress to provide meaningful language access to the agency's services for City residents with Limited English Proficiency (LEP). Its Language Access Plans described the steps that NYCEM has taken to provide its services to the LEP population.

¹ NYCEM (formerly the Office of Emergency Management, or OEM) was rebranded as part of a comprehensive effort to increase the public's awareness of its presence and role in the city. This rebranding included phasing out the use of the OEM title, acronym, and logo.

Overall, we found that NYCEM provides these services during emergencies in 13 languages, including the top 10 New York City LEP languages. Further, we found that through City-wide contracts with language vendors (Language Line Services, LLC and Geneva Worldwide, Inc. used in connection with 311, Voiance used for telephonic services, and ALanguage Bank used for translation services), NYCEM has the ability to provide documentation, translation, Communication Access Real Time Captioning, American Sign Language Video Remote Interpretation, and phone interpretation services in over 100 languages. Appendices I and II contain details of the specific items we tested and the results of our tests. Appendix III illustrates NYCEM's efforts to ensure Local Law 30 compliance.

Agency Response

In its response, NYCEM agreed with the audit's findings and recommendations. NYCEM stated, "[w]e agree with your findings and recommendation to continue to maintain compliance with Local Law 30. NYC Emergency Management strives to provide meaningful language access to people with limited English proficiency to our community preparedness programs and during emergencies."

AUDIT REPORT

Background

New York City, with a population of more than 8.5 million people, is home to one of the most diverse populations in the world, with more than 3.2 million foreign-born residents from more than 200 countries. According to the New York City Department of City Planning, nearly one-half of all New Yorkers speak a language other than English at home, and almost 25 percent of City residents age five and over, or 1.8 million persons, are not proficient in English. For residents with limited English proficiency, interacting with City government can often be a challenge.²

Local Law 73 was enacted in 2003 to enhance the ability of City LEP residents to interact with City government and, more specifically, to obtain needed social services. The law applies to four social service agencies: the Human Resources Administration; the Department of Homeless Services; the Administration for Children's Services; and the Department of Health and Mental Hygiene. It requires that free language assistance services be provided for clients when they seek to obtain services at any of these agencies, as well as job centers and food stamp offices. In July 2008, Mayor Michael Bloomberg signed Executive Order 120 (EO 120), which requires all City agencies to provide opportunities for limited English speakers to communicate with City agencies and receive public services.

In 2017, the New York City Council enacted Local Law 30, effective July 1, 2017, which requires City agencies that provide direct public services or emergency services to have a language access plan that allows residents meaningful access to City services regardless of their proficiency in English. These translation services must be provided in the 10 top designated City-wide languages, consisting of (1) the top 6 LEP languages spoken by the population of New York City as determined by the Department of City Planning and the Mayor's Office of the Language Services Coordinator, based on U.S. census data; and (2) the top 4 LEP languages spoken by the population served or likely to be served by the agencies of the City of New York as determined by the Mayor's Office of the Language Services Coordinator, based on language access data collected by the City Department of Education, excluding the languages designated based on U.S. census data.

Specifically, Local Law 30 requires each agency to:

- Designate a Language Access Coordinator to oversee the creation and execution of an agency-specific internal language access policy and implementation plan.
- Develop such a plan using a four-factor analysis based on guidance issued by the U.S. Department of Justice including: the number or proportion of LEP persons in the eligible service population; the frequency with which LEP individuals come into contact with the agency; the importance of the benefit, service, information, or encounter to the LEP person; and the resources available to the agency and the costs of providing various types of language services.

² Mayor's Office of Immigrant Affairs, "State of Our Immigrant City" annual report, March 2018; New York City Department of City Planning <u>https://www1.nyc.gov/site/planning/about/language-access.page</u>

- Provide services in languages based on the top 10 LEP languages spoken by the population of New York City. These languages are determined by the Department of City Planning and the Mayor's Office of the Language Services Coordinator, based on (1) United States Census data, as to 6 languages; and (2) data collected by the Department of Education, as to 4 languages, as those languages are relevant to the services offered by each agency. The designated top 10 LEP languages spoken by the population in New York City are Spanish, Chinese (Mandarin, Cantonese, Taiwanese, and Formosan), Russian, Haitian/French Creole, Bengali, Korean, Arabic, Urdu, French, and Polish.³
- Ensure that the language access policy and implementation plan includes: identification and translation of the most commonly distributed public documents; interpretive services, including telephone interpretation for the top six languages and others as appropriate; training of frontline workers on language access policies; posting of signage in conspicuous locations about the availability of free interpretation services; and the establishment of an appropriate monitoring and measurement system regarding the provision of agency language services.
- Incorporate consideration of language access in agency communications such as emergency notifications, public hearings and events; and incorporate plain language principles for documents most commonly distributed to the public that contain important or necessary information.
- Update the Language Access Plan based on changes in the agency's service population or services at least every three years and publish the plan on the agency website.

Local Law 30 references the New York City Charter's requirement that the Mayor's Office of Operations (Operations) coordinate the provision of language services to the public and provide technical assistance to City agencies providing such services. In addition, the Mayor's Office of Immigrant Affairs is responsible for promoting immigrants' access to City services, by developing appropriate polices and outreach programs to educate immigrants and foreign language speakers about such services.

We are conducting a series of audits of City agencies' compliance with Local Law 30. We have created a compliance checklist and designed audit tests to be performed to facilitate uniformity in our reporting to the extent reasonably possible. The checklist and testing criteria, with results for this audit, are presented in Appendices I and II.

This audit focuses on whether NYCEM complied with Local Law 30. NYCEM is responsible for the coordination of City-wide emergency planning and response for all types and scales of emergencies. Its staff consists of over 200 professionals from diverse backgrounds and areas of expertise, including individuals assigned from other City agencies.

NYCEM is the City's emergency preparedness agency. It is responsible for the coordination of Citywide emergency planning, preparedness, and response for situations that ensue during emergencies. It does not provide direct social services or issue licenses, permits, or registrations.

³ The New York City Department of City Planning designated these as the top 10 languages,

https://www1.nyc.gov/assets/planning/download/pdf/about/language-access/lap_dcp.pdf?r=0818 .

As defined by the Mayor's Office of Immigrant Affairs, MOIA Annual Report-March 2018 page 25, Guidance on City Legislation.

Therefore, NYCEM staff has limited interaction with the public. Interaction with the public occurs primarily through its emergency preparedness programs such as "Notify NYC" and "Ready New York." These programs are multilingual communications that cover numerous emergency scenarios including pre-scripted mass transit alerts, public health and safety notifications, utility alerts, weather alerts, and notifications of fallen trees. Notify NYC is a means to communicate emergency information quickly to City residents.

NYCEM's Ready New York is a campaign that was started due to the City's concerns about public safety. Generally, the information is disseminated to the public through pamphlets. The campaign serves as a means to inform residents about hazards that may exist when emergencies occur and encourages residents to be prepared for emergencies. In addition, every September (designated National Preparedness Month), NYCEM runs general and hazard-specific multilingual advertising to promote emergency preparedness.

To meet language access needs that develop during emergencies, NYCEM contracts with several vendors that are available to provide oral interpretation and written translation services 365 days a year, 24/7 with a two-hour advance notice. During each emergency, NYCEM works with designated agencies to ensure that signage is available in multiple languages. Additionally, NYCEM's Logistics unit maintains multilingual signage kits for coastal storm shelters and service centers. Sheltering kits contain "I Speak: Free Interpretation Available" signs, NYCEM-created picture communication boards, and other translated signage. During emergencies, NYCEM also provides supplementary signage that is specific to the multiple languages of the affected community. Finally, residents are able to find information concerning emergency preparedness, planning, relief recovery, and various other services offered by NYCEM on its website.

Objective

The objective of the audit was to determine whether NYCEM is in compliance with Local Law 30, which requires that City agencies providing direct or emergency services to the public create a language access implementation plan and to ensure meaningful language access to their services.

Scope and Methodology Statement

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

To achieve our audit objective, we reviewed NYCEM's Language Access Plans dated 2008 and 2018 and other pertinent documents and interviewed key NYCEM personnel. Our scope period is from May 2018 through March 1, 2019. Please refer to the Detailed Scope and Methodology at the end of this report for the specific procedures and tests that were conducted.

Discussion of Audit Results

The matters covered in this report were discussed with officials from NYCEM during and at the conclusion of this audit. NYCEM officials were notified of our findings during the course of the audit and agreed that an exit conference was not necessary. On April 2, 2019, we submitted a draft report to NYCEM with a request for comments. We received a written response from NYCEM on April 17, 2019. In its written response, NYCEM generally agreed with the audit and stated, "[w]e agree with your findings and recommendation to continue to maintain compliance with Local Law 30. NYC Emergency Management strives to provide meaningful language access to people with limited English proficiency to our community preparedness programs and during emergencies."

The full text of NYCEM's response is included as an addendum to this report.

FINDING AND RECOMMENDATION

We found that NYCEM generally complied with Local Law 30. Our review of NYCEM's Language Access Plans dated 2008 and 2018 found that NYCEM has made continuous progress to provide meaningful language access to the agency's services for LEP customers. Its Language Access Plans describe the steps that NYCEM has taken to provide its services to the LEP population.

For example, Notify NYC, an emergency alert program, gives LEP residents with access to messages in 13 different languages, including the top 10 designated languages, audio format, and American Sign Language (ASL). Communication to New York City residents can be via electronic mail (email), text messages, and telephone alerts and can also be seen on NYCEM's website. Amber Alerts and Wireless Emergency Alerts issued by the National Weather Service (severe weather warnings) are examples of notifications issued by Notify NYC.

Another example, NYCEM's Ready New York, a campaign that was started to respond to the City's concerns about public safety, provides pamphlets in 13 languages, including English, and NYCEM's signage kits contain multilingual posters informing residents with LEP how to request free interpretation service.

Overall, we found that NYCEM provides these services during emergencies in 13 languages including the top 10 New York City LEP languages. Further, we found that through City-wide contracts with language vendors (Language Line Services, LLC and Geneva Worldwide, Inc. used in connection with 311, Voiance used for telephonic services, and ALanguage Bank used for translation services), NYCEM has the ability to provide documentation, translation, Communication Access Real Time Captioning, American Sign Language Video Remote Interpretation, and phone interpretation services in over 100 languages. Appendices I and II contain details of the specific items we tested and the results of our tests. Appendix III illustrates NYCEM's efforts to ensure Local Law 30 compliance.

Recommendation

1. NYCEM should continue to adhere to Local Law 30 to ensure that it adequately meets the language needs of the communities it serves.

NYCEM Response: "We agree with your findings and recommendation to continue to maintain compliance with Local Law 30. NYC Emergency Management strives to provide meaningful language access to people with limited English proficiency to our community preparedness programs and during emergencies."

DETAILED SCOPE AND METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, § 93, of the New York City Charter.

We are conducting a series of audits of City agencies' compliance with Local Law 30. To ensure uniformity in reporting on these audits, we have created a format that lists the specific tests conducted as it relates to the methodology. Please see Appendices I and II for details.

We reviewed all three of NYCEM's Language Access Policy and Implementation Plans issued in 2009, 2016, and 2018 and other pertinent documents, and interviewed key NYCEM personnel.

To achieve our objectives, we performed the following:

- Reviewed EO 120 and Local Law 30;
- Created compliance checklists to assess NYCEM's compliance with Local Law 30;⁴
- Conducted interviews with NYCEM's designated Language Access Coordinator and other staff members;
- Reviewed and assessed whether NYCEM's language assistance plan was developed in accordance with Local Law 30, using the required four-factor analysis;
- Tested whether NYCEM provided emergency services in at least the top 10 LEP languages spoken by the New York City population;⁵
- Obtained and reviewed documentation and assessed whether NYCEM identified and translated most commonly distributed public documents provided to or completed by the public;
- Tested whether interpretation services, including the use of telephonic interpretation services, are available. We made anonymous phone calls to NYCEM's main public access line to determine whether it could provide telephonic interpreter services in the top 10 LEP languages;
- Obtained and reviewed the employee manual for language access training and/or written policies and procedures.
- Observed NYCEM's signage kits to determine whether they contained multilingual posters;
- Assessed whether NYCEM established an appropriate monitoring and measurement system regarding the provision of agency language services;
- Assessed whether NYCEM created appropriate public awareness strategies for the agency's service population;

⁴ See Appendix I for the completed check list created in connection with this audit.

⁵ See Appendix II for further descriptions of the tests we conducted.

- Reviewed whether NYCEM's Language Access Plan is posted to its website; and
- Accessed NYCEM's website and translated the information into the top 10 languages spoken in New York City.

LEP COMPLIANCE CHECKLIST

		Auditor's	
	Question	Assessment	Auditor's Comments
	Does NYCEM provide direct public services or emergency services?	Yes	NYCEM provides emergency services Citywide.
2.	Does NYCEM have a Language Access Policy and Implementation Plan, and when was it instituted?	Yes	NYCEM's original Language Access Plan (2009) was based upon EO 120, the predecessor to Local Law 30. NYCEM's current Language Access Plan 2018 was developed by NYCEM and approved by the Mayor's Office of Immigrant Affairs in May 2018. This plan is currently posted on NYCEM's website.
3.	Does NYCEM have a Language Access Coordinator?	Yes	NYCEM's Deputy Commissioner for External Affairs is the designated Language Access Coordinator.
4.	Did the Language Access Coordinator oversee the creation of the Language Access Policy and Implementation Plan?	Yes	The Language Access Plan was revised and updated by the current coordinator. Local Law 30 of 2018 requires that each agency update its Language Access Plan, based upon the changes in the agency's service population or services at least every three years. The Language Access Coordinator stated that NYCEM will annually update the plan. The Language Access Plan is current as of September 2018.
5.	Did the Language Access Coordinator oversee the execution of the Language Access Policy and Implementation Plan?	Yes	NYCEM's language coordinator oversees the execution of the Language Access Plan.
6.	Does the Language Access Coordinator monitor the Language Access Policy and Implementation Plan?	Yes	NYCEM's language coordinator monitors the progress of the Language Access Plan.
7.	Did NYCEM develop the plan using the four-factor analysis?	Yes	NYCEM's 2018 Language Access Plan was developed using the four-factor analysis and the language needs most often used by affected population in incidents of an emergency. NYCEM utilizes data from the New York City Department of City Planning and the Mayor's Office of Immigrant Affairs to ensure that the four–factor analysis is properly utilized.
8.	Does NYCEM provide services in languages based on at least the top	Yes	Pursuant to NYCEM's Language Access Plan, NYCEM provides services in13 LEP languages, which includes the top 10 NYC languages, as required by Local Law 30.

APPENDIX I

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9. Does NYCEM identify and translate their "most commonly distributed	Yes	 LLC and Geneva Worldwide, Inc. used in connection with 311, Voiance used for telephonic services, and ALanguage Bank used for translation services) and has the ability to provide document translation and phone interpretation services in more than 100 languages as required by Local Law 30. NYCEM also uses the services of 311, which has telephonic capability for 175 languages.⁶ NYCEM's Language Access Plan identifies its most commonly distributed documents for translation into the 13 LEP languages including the top NYC 10 languages.
public documents?"		The following are examples of documents that are translated: <i>Ready New York</i> guide, <i>My Emergency Plan</i> , and <i>My Pet's Emergency Plan</i> . We translated these examples to the 13 LEP languages.
10. Does NYCEM provide interpretation services (including telephonic interpretation) for the top 10 LEP languages and others as appropriate?	Yes	Through the Citywide contract with the Language Line Services, LLC, NYCEM is able to provide interpretation services in over 100 languages, including the top 10 LEP Languages. NYCEM also contracts with Geneva Worldwide, Inc. to provide written transcription services. In addition, NYCEM uses translators from 311 which enables them to provide translation into 175 languages.
11. Does NYCEM train its frontline workers and managers on language access policies and procedures?	Yes	In 2016, NYCEM started an updated mandatory language-access online training module that employees can complete at their desks. The training material describes NYCEM's language access policies and procedures for each unit, and the Citywide Interagency Language Access Protocol. This training was updated in March 2018, and NYCEM's employees received the updated training as required by Local Law 30. We reviewed a copy of the employee-training material.
12. Are there any signs or postings in NYCEM regarding free available language assistance?	Yes	As a coordinating agency, NYCEM staff has limited engagement with the public. Interaction with the public occurs primarily through NYCEM's emergency preparedness programs. NYCEM signage kits contain multilingual posters informing residents with LEP how to request free interpretation.
13. Did NYCEM establish an appropriate monitoring and measurement system regarding the	Yes	NYCEM maintains an event-management database in which community events that require interpretation and/or distribution of material in languages other than English are tracked. NYCEM's Ready New York

and measurementand/or distribution of material in languages other thansystem regarding the
provision of agency
language services?English are tracked. NYCEM's Ready New York
program conducts between 750 and 1,000 emergency
preparedness events each year, of which nearly a
quarter are geared toward residents with LEP.

⁶ Source: NYC 311 Language Access Plan 2018.

APPENDIX I

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14. Did NYCEM create public awareness strategies for language services?	Yes	NYCEM does not provide direct language assistance services. NYCEM has a dedicated Cultural Outreach Coordinator who works closely with immigrant communities across the City. The coordinator is responsible for scheduling and conducting emergency preparedness events for residents with LEP as well as distributing translated material in these communities. The emergency preparedness guides and materials are available in 13 languages, which include includes the top 10 NYC LEP languages, on NYCEM's website and through 311. Additionally, these guides and materials are distributed through NYCEM's program and outreach events across the five boroughs. NYCEM, in conjunction with the Mayor's Office of Immigrant Affairs and the City University of New York, produces the program, "The Storm," which focuses on emergency preparedness and City resources that may be deployed during an emergency. The program is part of the "We Speak NYC" series for English Language learners. In addition, NYCEM provides a toolkit designed for instructors, community-based groups, and volunteer organizations that help English language learners improve their English skills while they learn how to prepare for an emergency.

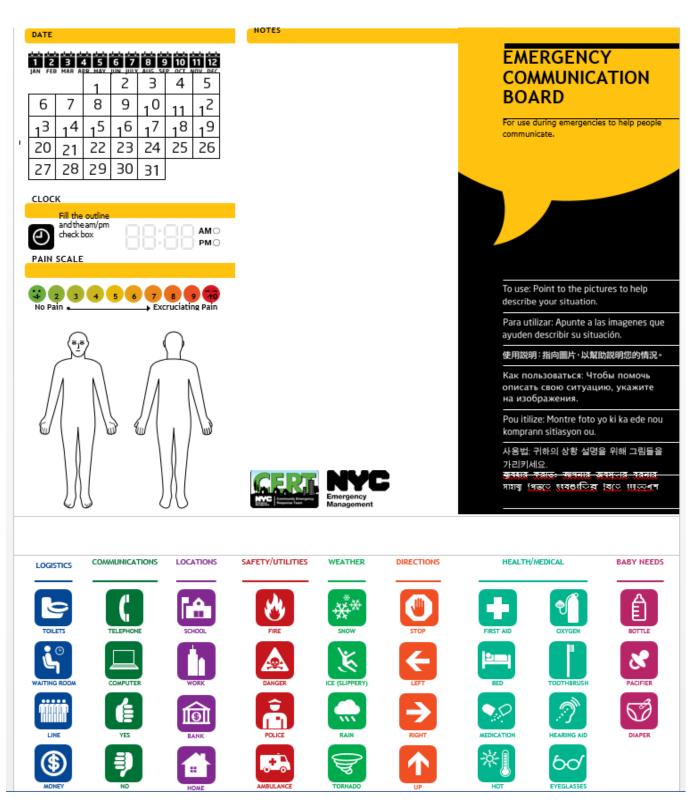
APPENDIX II

LEP TESTS CONDUCTED

	Test	Criteria For Evaluation	Auditors' Assessment
1.	Anonymous phone calls.	 Was a staff person able to respond to the call in the language of need, or transfer the call to another staff person or a telephonic Interpreter service? 	NYCEM's main public access line, which is 311, is able to provide telephonic interpreter services in the top 10 LEP languages.
2.	Is the website accessible in languages other than English?	Was public information available in languages other than English?	Of the 103 languages listed on NYCEM's website, we sampled and successfully translated the top 10 languages spoken in New York City.
3.	Translate "You Have a Right to Free Interpretation" posters.	Did the poster state that free translation and interpretation services were available?	NYCEM signage kits contain multilingual posters informing residents with LEP that they can request free interpretation.

APPENDIX III

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LOCAL LAW 30 COMPLIANCE --- OBSERVATION

LOCAL LAW 30 COMPLIANCE -- OBSERVATION

READY NEW YORK - REDUCE YOUR RISK BENGALI



APPENDIX III Page 3 of 5

LOCAL LAW 30 COMPLIANCE -- OBSERVATION

KNOW YOUR ZONE HURRICANE WARNING



LOCAL LAW 30 COMPLIANCE --- OBSERVATION

ENGLISH TRANSLATION (RECENT MESSAGE)

Notify NYC is the City of New York's official source for information about emergency events

最近的消息

2019年2月5日下午1时19分35秒

通知纽约-银警报

银警报在下午1:15发出的2019年2月5日。阿银警报已经发布了弗朗西斯Cinolauro,一个84岁的白人男性从76街和11大道的布鲁克林区。缺少的可能是需要的医疗照顾。说明:5'6"高,150磅,灰色的头发,蓝眼睛穿着蓝色西装裤,米色衬衫,灰色和蓝色外套和蓝色的帽子最近看到:第76街和11大道在布鲁克林约为4:30 AM在2019年2月5日的车辆:1996 红日产的Sentra与车牌号码C33-8AL如果你看到失踪者,请拨打9-1-1丢失的照片,请访问:https://开头flic.kr/p/2duWrjf要查看美国手语(ASL)此消息,过算,可能师,中文,法语,KreyòlAyisyen,意大利语,한국어,波兰语,Русский,西班牙语,j或或"7": http://on.nyc.gov/1ZlUYfl。

2/5/2019 1:19:35 PM

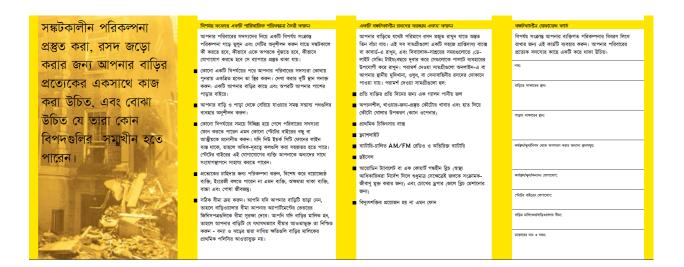
Notify NYC - Silver Alert

Silver Alert issued 02-05-2019 at 1:15 PM. A Silver Alert has been issued for Francesco Cinolauro, a 84-year-old white male from the area of 76th Street and 11th Avenue in Brooklyn. The missing may be in need of medical attention. Description: 5'6" tall, 150lbs, with gray hair and blue eyes. Wearing blue dress pants, a beige shirt, gray and blue jacket, and a blue hat. Last Seen: 76th Street and 11th Avenue in Brooklyn at approximately 4:30 AM on 02-05-2019. Vehicle: 1996 red Nissan Sentra with license plate number C33-8AL If you see the missing person, please call 9-1-1. A photo of the missing is available here: https://flic.kr/p/2duWrjf To view this message in American Sign Language (ASL), ice, and a the provide the provide

APPENDIX III Page 5 of 5

LOCAL LAW 30 COMPLIANCE -- OBSERVATION

MY POCKET GUIDE - BENGALI



English Translation (Partial):

Everyone in your home should work together to make an emergency plan, gather supplies, and understand the hazards they may face.

Topics: Make a Household Disaster Plan

Assemble an Emergency Supply Kit Emergency Reference Card

ADDENDUM



April 17, 2019

Marjorie Landa Deputy Comptroller for Audit 1 Centre Street New York, NY 10007

Re: Audit Report on the Compliance of the New York City Emergency Management with Local Law 30 Regarding Access to City Services for Residents with Limited English Proficiency SZ18-129A

Dear Deputy Commissioner Landa:

We have received and reviewed the Draft Audit Report on our compliance with Local Law 30. We agree with your findings and recommendation to continue to maintain compliance with Local Law 30. NYC Emergency Management strives to provide meaningful language access to people with limited English proficiency to our community preparedness programs and during emergencies.

We would like to ask that you amend a couple sections of the report to reflect our language access efforts more accurately:

- In addition to the language vendors mentioned on pages 2, 10, and 11 Language Line Services, LLC and Geneva Worldwide, Inc. used in connection with 311, Emergency Management's telephonic vendor is Voiance; our translation vendor is ALanguage Bank.
- We request that the information about the Notify NYC program on page 5 is changed from: "Communication to New York City residents can be via electronic mail (e-mail), text messages and telephone alerts and can also be seen on NYCEM's website. Amber Alerts and Wireless Emergency Alerts issued by the National Weather Service (severe weather warnings) are examples of notifications issued by Notify NYC."

To: "Notify NYC disseminates emergency notifications via electronic mail (e-mail), text messages and telephone that can also be seen on the Notify NYC website. Notify NYC's multilingual messages span a variety of emergency situations, including pre-scripted mass transit alerts, fire department activity, public health and safety notifications, utility alerts, weather alerts, alternate side parking updates, and downed trees notifications."

Thank you for your review.

Sincerely,

Christina Farrell Deputy Commissioner, External Affairs