



DEPARTMENT OF RECORDS & INFORMATION SERVICES

2021 Language Access Plan



NYC DEPARTMENT OF RECORDS & INFORMATION SERVICES 2021 LANGUAGE ACCESS PLAN

I. Agency's Name and Agency's Language Access Coordinator:

This Language Access Plan is for the Department of Records & Information Services. The name and title of the agency's Language Access Coordinator (LAC) is Gerald Rosero, Special Assistant to the Commissioner. This information can be found on the agency's website, please click on the following hyperlink: <https://www1.nyc.gov/site/records/about/language-access-plan.page>.

II. Agency Mission and Background

The New York City Department of Records and Information Services (DORIS) operates the Municipal Archives, the Municipal Library and the Municipal Record Center. The agency fosters civic life by preserving and providing access to 243,000 cubic feet of historical and contemporary City government records, ensures that City records are properly maintained following professional archival and record management practices, develops and enforces record management policies and makes materials available to diverse communities both online and in person at the Municipal Library, Municipal Archives and Visitor Center.

Agency's Direct Public Service Divisions: There are three divisions that interact with the public, they are: The Municipal Library, Municipal Archives and Outreach/External Affairs. This language access plan is designed to provide language access services to these divisions as well as on the agency's website. By providing comprehensive language access services, any patron regardless of language capability may be able to utilize the agency's vast collections.

The Municipal Library provides reference services, oversees an online repository of reports from City agencies and operates a research library open to the public. The holdings are published documents that show the evolution of New York City government from the 19th Century to the present. The collection is comprised of reports, press releases, maps, indexes, and clippings. The Municipal Archives preserves and makes available New York City government's unpublished historical records dating from 1645 to the present. The collections include office records, manuscript material, still and moving images, ledgers, birth death and marriage records, maps, blueprints and sound recordings. The External Affairs division interfaces with the public via social media platforms, the agency website, lectures, exhibits and public program activities.

III. Agency Language Access Policy and Goals

The Department of Records and Information Services has developed its Language Access Plan to guide the agency in serving patrons who have limited English language proficiency. This plan will ensure that all patrons and prospective patrons will have access to the department's resources regardless of the language they speak. The agency will publish the Language Access Plan on its website and update the plan as needed.

In accordance with the agency language access policy, the agency will:

- Provide language access services in the ten designated citywide languages.
- Provide telephonic interpretation services in at least 100 languages using the designated city vendor.
- Post multi-lingual signage regarding the availability of free telephonic interpretation services.
- Provide training to staff in the language access plan procedures.
- Update its Volunteer Language Bank.
- Develop reporting mechanisms to measure services delivered and complaints received.

The agency Language Access Coordinator (LAC) will monitor the plan with the assistance of the division directors. The LAC will hold semi-annual meetings with public facing staff of these divisions to discuss and implement changes and improvements to the Plan. The LAC will also distribute a reporting template which the division directors will use to submit semi-annual reports. The semi-annual report will document the number of language interpretation services requests made to the division, along with what language was requested.

IV. Agency Language Access Accomplishments and Progress on Goals from previous LAIP.

Since LL 30's inception in 2017, the agency has implemented various procedures to ensure Language access services are available for any potential LEP patron, they include the following:

- Identifying an Agency Language Access Coordinator to develop and coordinate language access services.
- Contracting with qualified vendors to provide telephonic interpretation services as well as in person interpretation services.
- Training all public serving staff to properly identify LEP patrons and train them on how to use tools to identify the primary language of the LEP patron.

- Provided resources to staff to assist LEP patrons, I Speak cards, Dual handsets, multilingual posters.
- Updated website to include translation services in over 100 languages, contact information of the LAC, how to request in person interpretation services.
- Developed procedures to address language access complaints from 311, walk-ins, email etc.

Update on goals from previous LAIP

Goal	Update
May 2018 Update Agency Employee Language Access Bank	The Agency Language Access Bank has been updated.
May 2018 Select Language Access Vendors	The Agency has selected vendors to provide telephonic interpretation services and will select a new vendor for in-person interpretation services.
May 2018 Meet with Public serving staff to familiarize them on LL30 requirements and the LAIP.	Met with staff and provided training and overview on LL30 and the LAIP.
June 2018 Conduct Language Access Training for public facing staff.	Provided training on procedures to Identify LEP patrons, available Language Access resources, how to access LA services, document complaints, ensure multilingual posters are always visible.

V. LEP Population Assessment

As guided by Local Law 30, the department of Records & Information Services (DORIS) applies the “four factor analysis” utilized by the US Department of Justice to assess obligations for language access as the basis for its Language Access Plan.

Factor 1 – The number or proportion of LEP persons in the eligible service population:

As noted in section II, the Department has three divisions that have direct contact with the general public: The Municipal Archives, the Municipal Library and the External Affairs Group, as such the eligible service population, is the general population of New York City.

DORIS along with the Mayor' Office of Immigrant Affairs (MOIA) looked at citywide data to assess the number or proportion of LEP persons and their languages in the eligible service population for the services and information provided by this department. According to the analysis of the census data provided by the Department of City Planning, 49% of New Yorkers above the age of five speak a language other than English at home. Twenty three percent of New Yorkers are considered limited English proficient (LEP).

The Department applies the analysis undertaken by MOIA under local Law 30 to determine the top ten citywide languages based on data from the American Community Survey and data from the US Census. Based on this analysis, the ten citywide languages for FY21 are: Spanish, Chinese, Russian, Korean, Bengali, Haitian Creole, Arabic, Urdu, French, and Polish.

Factor 2 – The frequency with which LEP individuals come into contact with the agency.

It has been the agency's experience that LEP speakers of the above-mentioned languages are not our primary customer base.

In FY 2019, the Municipal Archives Division responded to 34,808 requests for copies of vital records and a total of 56,832 requests for information or research services (this figure includes the vitals, plus walk-ins, emails, etc.). None of these requests required language interpretation services. The Municipal Library received 3,299 requests for information or research service. No requests for language services was received. The External Affairs group hosts numerous exhibits and special programs throughout the year. They provide the opportunity for patrons to request in-person language interpretation services for any of these special events as posted on the website. <https://www1.nyc.gov/site/records/exhibits-education/exhibits-education.page>. No requests were made for this service.

The Department used 2019 figures for this report, due to the government closures which occurred because of the pandemic in 2020. Although in the past the agency has not received any requests for language services, the 2021 language access plan will build on the current capacity to provide language access services. This plan and/or future updates will incorporate data to evaluate the changes in language access needs of our customers, including identifying supplemental languages.

Factor 3 - The importance of benefit, service, information, or encounter to the LEP person.

The Department strives to provide equal services to all our patrons no matter what language they speak. It has always been the Department of Records critical objective to increase the volume and availability of, and access to, public records and publications. The updated Language Plan will help the agency continue to respond promptly to all research requests no matter the language spoken by the requestor.

DORIS's public serving divisions provide important information and services to the public in a variety of ways including but not limited to:

- Copies of Vital Records, such as Birth Certificate and Death Certificates.
- Copies of Property Cards for buildings throughout the City.
- Copies of Historical Photos.
- Copies of Building Plans.
- Tax Photos for every property in New York City.
- Research Services for Municipal Records.

To ensure access to these important services available to all communities in New York City, DORIS through this Language Access plan describes how it will ensure patrons with limited English proficiency, have access to its information and services.

Factor 4 - Resources Available

The Department will utilize certified translators and interpretation service providers to deliver Language Access Services. In the past the agency has contracted with VOIANCE a DCAS vendor to provide telephonic interpretation services in over 100 languages. Currently the department is evaluating vendors to provide document translation services and in-person interpretation services. As the agency plans for re-opening of in person services, these language interpretation service contracts will be updated accordingly. Our existing agency volunteer language bank, which currently can provide limited services in the following languages; Spanish, Cantonese, Italian, French, French Creole, Russian, Gujarati, Punjabi, and Hindi will be utilized to communicate with LEP individuals and to review translated materials.

Based on the above four factor analysis the agency has outlined its language access needs and has updated its language access plan to ensure all New Yorkers regardless of language ability are able to access and utilize the agency's resources.

VI. Provision of Language Access Services

Translation Services:

Mostly researchers and genealogist utilize the Library and Archives division; at this time, no Most Commonly Distributed (MCD) documents or forms have been identified for translation. The Department will monitor this provision and adjust as necessary. The Department will review its need to translate existing MCD forms, such as the Birth and Death Certificate Applications, as well as the photo licensing agreement/permission to publish forms. If a future need arises for document translation, then the Department will utilize a DCAS approved vendor to provide these services. Any translated materials by a contracted vendor will have a secondary review by members of the agency's Language bank. They will review translated materials and provide feedback to the contracted vendor to ensure translations are done correctly and with minimum errors. The Language Access Coordinator will coordinate all requests for translations with respective divisions and contracted vendors. The LAC will maintain the list of any translated documents and update the list as necessary. During staff training, all attending staff will be made aware of the translation process and resources available to the agency.

Interpretation Services:

The Department will provide telephonic interpretation services in the divisions accessed by the public through VOIANCE. This vendor will provide telephonic language interpretation in over 100 languages.

Telephonic interpretation requests may occur in the Municipal Library and Archives divisions when an LEP patron requests assistance to order a copy of a Death, Birth, and/or a Marriage certificate, or to request research material. In the External Affairs division, an in-person interpretation request may occur for a scheduled public program event.

Library and Archives public facing staff have been trained on how to access telephonic interpretation services with VOIANCE. All necessary materials to call the vendor are in a clearly marked binder at the public access desks. The same material will also be placed on the Departments Intranet to facilitate the process of providing language services. Additionally, telephones with dual headsets will be available at the public access desks to help LEP patrons and department staff access the telephonic language services, as well as to monitor the quality of the interpretation service the LEP customer receives.

To provide in person interpretation services to a scheduled event, the

Department has placed on its website a statement as follows: "If you require interpretation services, in order to attend a DORIS public program event, please contact our Language Access Coordinator." The statement has an embedded hyperlink that will provide the LAC's contact information. In person interpretation requests must be received at least 3 days prior to a scheduled event. At this time due to Pandemic restrictions, in person Services for the Archives, Municipal Library and Public Programs are not scheduled. During this time the Department will outreach to DCAS to continue utilizing VOIANCE for telephonic interpretation and to choose a new in-person interpretation service vendor to have a contract in place prior to the agency scheduling public program events.

The agency will utilize "I Speak Cards" to assist staff to identify LEP individuals and their primary language. While staff may not be able to provide translation assistance at this initial contact, it is an excellent method to identify the language and then contact the vendor for telephonic translation services.

Language Access in Agency Communications

One of the primary methods for the department to communicate with the public, regarding available services and resources is thru its website. In 2019, the Department's website reached 1,002,000-page views. Currently there are links on the agency's home page, which allow visitors to translate the entire website content into over 100 languages. This translation method is currently the citywide standard set by DOITT. Moving forward as part of its website updates, the department will look to develop multilingual links on its homepage that connect users with content in the specific language. The Department will continue to look to the Mayor's Office of Immigrant Affairs and DOITT for any guidance regarding this issue and will adhere to citywide standards.

The department also utilizes various social media platforms such as Facebook, Twitter, Instagram, YouTube etc. to promote special events or disseminate information pertaining to historical events or resources.

Plain Language

The department has not identified a need to translate any MCD forms, but the two most widely used forms by the public will be reviewed to incorporate plain language principles. If the need to translate these forms arises in the near future, the forms will have already been updated with plain language principles.

The department will also reach out to organizations such as the Center for

Plain Language, a non-profit organization to assist in staff training regarding the utilization of plain language principles in developing agency written materials.

Policies and Procedures

The Department has developed the following procedures for language access services they include:

- How to Identify an LEP customer language: By utilizing Census "I Speak Cards" public facing staff will be able to identify the language of the LEP customer and contact the telephonic interpretation vendor to provide telephonic interpretation services.
- Resources to Provide Language Access Services: Materials on how to contact the vendor for telephonic interpretation services are in a clearly marked binder at the public service desks. These materials provide step by step instructions on what needs to be done to contact the language access service. All of these materials will also be placed on the Departments Intranet to ensure staff have access to them.
- Posting of Free Interpretation Signage: Multi-lingual posters advertising free language services will be posted in a visible place where the public is served, to ensure the public is aware of the free language services available to them. The LAC has placed these posters in these areas. Copies of the poster will be on the agency Intranet so that staff will be able to access it and print any of the existing posters are damaged or missing.

Languages Beyond the Top Ten

If an LEP patron that does not speak one of the 10 languages identified in LL30, and requires language access service, the department will utilize its telephonic vendor who can provide translation services in over 100 languages.

Emergency Preparedness and Response

The agency has developed a Continuity of Operations Plan to respond in case of an emergency. The Department's Continuity of Operation Plan has identified its essential service: to "Provide & Maintain Record Access & Retrieval for the City of New York and the Public." As such, telephonic interpretation services will be available via a wireless telephone service in the event that landlines are not operational or in the event of a need to relocate to an alternative

facility. In addition, staff from the agency's volunteer language bank may also be available to assist emergency LEP needs. The LAC will work with the emergency preparedness liaison in an emergency to ensure Language Access is part of the agency's emergency response. One of the principle methods of communicating with the public during emergencies is thru the department's website. Currently any announcement placed on the website can be translated to over 100 languages.

VII. Training

All front-line workers and supervisors in the Municipal Library, Municipal Archives and External Affairs divisions will be required to attend an annual training on the Departments language access policies and procedures as set forth in the Language Access Plan. The LAC will be responsible for providing the training. All staff attending the training will be required to sign a training attendance sheet. The LAC will maintain a list of all staff who have attended the training and report on this in the annual LL30 report. The agency will review and amend existing language access policy/procedures to ensure they are up to date and incorporate them into the training agenda.

Areas the training will cover:

- Ensuring that the Multi-lingual Free Interpretation Service posters are always visibly posted.
- Identifying the primary language spoken by the LEP patron using the "Language Identifications" tools.
- Documenting requests for interpretation services.
- How to contact the telephone interpretation contracted vendor when a patron needs this service.
- Language Access Resources location.
- How to handle and record language access complaints.

VIII. Record Keeping and Evaluation

The LAC will create a quarterly data-tracking log to gather data information on language access services requests. The agency front line staff will use this data-tracking log to record the number of patrons who required these services. The Municipal Library, Municipal Archives and the External Affairs division, will record requests for language services and at the end of the quarter; they will submit the log to the agency's LAC. The LAC will review these logs and maintain all data supplied by the divisions that use interpretation services as well as all reports supplied by contracted vendors.

All divisions will be expected to follow the Plan to comply with local law 30. The LAC may conduct spot checks of the divisions that use interpretation services

by calling or having someone come in who will identify themselves as not being English proficient. If a staff member is not following the agency's Plan, additional training can be provided to the individual staff member or the entire division.

IX. Resource Analysis and Planning

The department may use a MWBE vendor for document translation if needed and will utilize VOIANCE, a DCAS approved vendor for its telephonic interpretation services. The Department is in the process of identifying a DCAS vendor for in-person interpretation services, which may be used at public program events. The LAC will coordinate the staff training; maintain data regarding language access services; respond to 311 language access complaints and issue reports to the Divisions and Commissioner regarding language access issues.

The department has created a volunteer language bank. This language bank will be updated regularly to bring in new volunteers and new languages. The language bank currently can offer the following languages: Spanish, Cantonese, Italian, French, French Creole, Gujarati, Punjabi and Hindi. Volunteers will be assessed in language skill level utilizing the American Council on the Teaching of Foreign Languages proficiency guidelines (ACTFL).

Because DORIS is a small agency with a limited budget to implement this plan, we will reach out to other city agencies and identify other resources available throughout the City. We will review other agencies' best practices and incorporate those practices when updating the Language Access plan.

X. Outreach and Public Awareness of Language Access Services

To ensure the public is aware of the availability of the department's language assistance services, such as the free interpretation services, the department will embark on a public awareness campaign utilizing printed materials as well as web and social media channels.

The department will prominently display posters stating the availability of free interpretation services at locations used by the public.

Website: The agency will post on its homepage the availability of free interpretation services. It will also place the updated language access plan on its website.

Social Media: Using its social media platforms i.e. Twitter, Facebook, and Instagram the agency will post on a regular basis the availability of free

interpretation services.

XI. Language Access Complaints

To ensure language access complaints are answered and resolved in a timely manner, the agency will: include a module in our annual staff training; monitor language access complaints received through 311 and through its internal complaint process; and appoint a language access coordinator responsible for receiving, tracking and answering complaints.

Staff Training: How to handle and record complaints regarding interpretation services will be part of the staff training and development process. Staff training will focus on utilizing a customer service-based approach in which the front line staff can resolve problems in a manner that allows patrons to satisfactorily receive requested services. If the front-line staff is unable to resolve the issue immediately, then they will seek assistance from their direct supervisor. If the issue cannot be resolved at that time, agency staff will inform the patron that they can file a complaint either by calling 311 or filling out a written complaint form.

Tracking Complaints/Maintaining Records: The LAC will receive complaints made through 311 and through its own internal complaint process. The coordinator will log the complaints into a central complaint file and will be tasked to investigate the complaint and respond accordingly.

Reporting Language Access Complaints: The LAC will compile all language access complaints on a monthly basis and generate a quarterly report.

Annual Reporting: The LAC will issue an annual agency language access complaint report.

XII. Implementation Plan Logistics

The Commissioner of the Department of Records & Information Services has appointed the Special Assistant to the Commissioner as the agency's Language Access Coordinator. The Language Access Coordinator's responsibilities are to:

- Update and maintain the agency Volunteer Language Bank database.
- Schedule training to ensure that agency staff is prepared to provide language assistance upon request. Provide support and guidance to agency personnel regarding the language access services offered at the agency whether through contracted interpreters or onsite volunteer interpreters

- Periodically review needs and update as necessary agency's documents/forms for translation.
- Receive and respond to all language access complaints.
- Develop and maintain statistical information relating to the agency Language Access Plan.
- Develop a process for providing implementation updates as part of the agency's annual reporting requirements. Issue quarterly reports and annual reports.
- Revise the Language Access plan.

The following goals and milestones have been identified to advance language access at the department.

Language Access Goals	Milestones	Responsible Staff	Deadline
Update Language Access Plan	Review previous LA access requests.	Language Access Coordinator	May 2021
Update Language Bank	Contact existing staff, add new staff.	Language Access Coordinator	June 2021
Schedule Annual Training	Review previous training and update as needed.	Language Access Coordinator	July 2021
Update Contracted Vendors	Update existing contracts.	Language Access Coordinator, Commissioner	July 2021
Update Language Access Materials and Resources	Upload materials to agency Intranet, provide material to public serving desks.	Language Access Coordinator	July 2021
Begin to Develop Multilingual content for the website	Develop Information highlighting services and Resources at DORIS	Language Access Coordinator and Public Serving Divisions	October 2021
Translate Multilingual Content	Translate Content into the Ten designated languages	Language Access Coordinator and Certified Translators	December 2021

Develop Multilingual links for website	Review home page to incorporate multilingual links.	Language Access Coordinator, IT Division	January 2022
Develop individual language pages	website to include language pages	Language Access Coordinator, IT Division	February 2022
Update Website	Submit request to DOITT to update home page and add individual language pages.	IT Division and DOITT	March 2022
Update Language Access Plan	Review needs with Division Directors	Language Access Coordinator	June 2022
Continue Assessing Language Access Needs and Updating Language Access Plan	Meet with Division Directors, MOIA, vendors	Language Access Coordinator, Division Directors, Commissioner	2022-2024