



Language Access Implementation Plan

**New York City Department of Sanitation
City of New York**

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<https://www1.nyc.gov/assets/dsny/site/language-access-plan>

Edward Grayson – Commissioner

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II. Agency Mission & Background

Mission of DSNY

As the world's largest sanitation department, the New York City Department of Sanitation (DSNY) is proud to keep our great city healthy, safe and clean. Every day, DSNY collects more than 10,500 tons of residential and institutional garbage and 1, 760 tons of recyclables and enforces the City's Administrative and Health Code related to Sanitation, clearing litter, snow and ice from 6, 300 miles of city streets. In addition, New York' Strongest removes debris from vacant lots and abandoned bikes and vehicles from city's streets. DSNY committed to sending zero waste to landfills by 2030 by efficiently managing solid waste and developing environmentally sound long-term planning for handling refuse, organic waste and recyclables. The Department operates 59 district garages and manages a fleet of 2,033 collection trucks and 450 mechanical brooms.

The nature of the agency's operation is not client-driven where services are provided "in person" resulting in very limited face-to face interaction with LEP customers. The DSNY's primary services are to provide communities with refuse and recycling collection, street cleaning and snow removal. While these City services do not fully depend upon consumer interaction, we remain committed to providing Limited English Proficiency (LEP) individuals with free interpretation services and materials developed/implemented by DSNY, in compliance with the Mayor's Office of Immigrant Affairs (MOIA) guidelines. The New York City Customer Service Center (311) handles customer service requests and complaints citywide. LEP-related service requests or complaints triaged and handled with its available telephonic interpretation contact. As needed, the DSNY also communicates with New Yorkers through its outreach and educational programs. Our community engagement, outreach and educational efforts are specifically tailored, directed to the public in general as well as used to educate identified neighborhood groups that would benefit from language translation services.

III. Agency Language Access Policy and Goals

In keeping with Local Law 30 of 2017, the Department of Sanitation shall provide, to the extent possible, access to services and information to persons with Limited English Proficiency (LEP).

The Agency remains committed to developing and improving ways to maintain communications with the City's LEP community. We are working on goals to:

- increase image-based messaging wherever possible to broaden LEP access to Agency communications;
- update the DSNY *Sanitation Material Request Form* to include additional language options;
- work to improve our language PDFs database to include all fliers and updated information;
- continue re-evaluating the definition of "commonly distributed" to include as many pieces based on new usage data;
- improve process to identify and track preferred language needs
- continue established partnerships with elected officials, community groups and immigrant/ethnic service organizations to provide outreach and education about Sanitation services and codes to LEP customers;

- review City Planning demographic/census data for changes and feedback from local community groups, service organizations and its field staff to improve and/or improve the identification of languages/translations needed for specific outreach or educational campaign;
- Continue review of educational/informational material for plain language usage.

IV. Agency Language Access Accomplishments and Progress on goals from Previous LAIP

We are pleased to report that the DSNY achieved many milestones since the 2018 update. Since then we:

- advertised for the Carryout Bag Ban in multiple ethnic newspapers reaching 840,000 customers;
- offered trainings in English, Russian, Spanish and Ukrainian for schools, apartment building staff and businesses;
- provided new direct links to the translated Compost Tips Sheets on the Make Compost section of MCNT: makecompost.nyc;
- continued to translate materials with Ericksen Translations;
- provided 8 new staff with access to Voiance telephonic interpretation services;
- provided refresher telephonic interpretation services training to staff teleworking due to COVID; the Voiance telephonic interpretation services were particularly helpful for DSNY's work and commitment to GetFoodNYC;
- incorporated image-based where possible making it easier for LEP customers to understand DSNY messaging;
- Contract renewal conversations are underway with the procurement team for both translation and interpretation services.

Previous Language Access Goal	Update
Expand language services via vendor contracts	Voiance telephonic contract secured; Expanded working relationship with Eriksen Translations, Inc. 30+ new documents translated Over 120 DSNY material are available in various languages
PDF Database	Work to improve our language PDFs database to include all fliers and updated information
	continued

Training	Voiance telephonic services: retraining as needed New staff: trained in plain language and informed of the protocol/process regarding translating material
Improving ability to track LA requests	Ongoing
Participation in language-based outreach events	Community engagement staff participated in 17 language-specific outreach events in 2019 (N/A in 2020 due to COVID pause)

V. Limited English Proficiency Population Assessment

U.S. Department of Justice “Four-Factor Analysis”

Title VI of the Civil Rights Act of 1964, prohibits discrimination based on race, color or national origin to include discrimination based on English proficiency. Therefore, service providers must provide the Limited English Population with access to programs, services, oral interpretation and written translation of vital documents.

In compliance with the DOJ’s Four Factor Analysis (F.F.A) the Department must assess the following:

1. Proportion and demographics of LEP persons using the services;
 2. Frequentness of LEP persons come contact with services;
 3. Nature and importance of services provided to LEP persons;
 4. Resources available and costs to recipient.
1. Proportion and demographics of LEP persons using the services: The Department of Sanitation uses the Department of City Planning (DCP) demographic neighborhood data along with feedback from local community groups, service organizations and its field personnel to determine what language translations may be helpful to a specific campaign. Since the DSNY provides public services which do not require direct contact with the public – the nature of our operations is not client driven - our direct contact with the public in comparison to the types of services provided is minimal. On a case-by-case basis, we review current neighborhood language-access needs.
 2. Frequentness of LEP persons come contact with services: As mentioned previously, the Department of Sanitation’s interaction with the LEP population is quite limited primarily due to the nature of its delivery of city services. Contrary to most city agencies, DSNY does not operate “in person”/walk-in” centers. However whenever necessary, it serves the LEP community in multiple languages by way of bi-lingual staff who are invited to meetings/events, distribute available translated/image-based material, or contracted interpretation services in our Customer Service Unit where escalated issues are referred from 311. Although most information may be neighborhood specific, commonly used information is then made available in the top ten citywide languages as determined by the Mayor’s office of Immigrant Affairs.

3. Nature and importance of services provided to LEP persons: While the Department of Sanitation understands the importance and benefits of communicating with LEP clients in their native languages, the nature of our business does not lend itself to direct interaction with the public. We do however, provide language appropriate translated material or bilingual staff as part of our regular community engagement and outreach practices. Our non-client based business is to keep our City healthy, safe and clean by collecting more than 10,500 tons of residential and institutional garbage and 1, 760 tons of recyclables and enforces the City's Administrative and Health Code related to Sanitation, clearing litter, snow and ice from 6, 300 miles of city streets.
4. Resources available and costs to recipient: Because of our minimal interaction with the public the NYC Customer Service Center at 311 is our primary source for review and referring public requests for services and/or information. The DSNY's history with LEP-related service requests remains minimal. On those rare occasions when LEP clients submit service requests by contacting 311, Community Affairs staff triage the request and contacts the appropriate division for investigation. We provide the same attention and prompt response (typically under the 14-day City Hall mandate) to the LEP community. Typically, our contracted telephonic interpretation service makes it possible for us to respond to LEP-related concerns on the day we receive the request.

VI. Provision of Language Access Services

Telephonic and Interpretation Services: The DSNY contracts Ericksen Translations and Voiance for language access services. Joan Byrnes, Senior Manager, Zero Waste Communications from our Bureau of Recycling and Sustainability oversees the contracts and LAP service requests.

Where in-house or City language bank expertise may be available, efforts are made to utilize them for translating and vetting materials for accuracy in the delivery of information. The volunteer Language Bank remains a valuable source for Language Access needs.

The Bureau of Community Affairs and the Bureau of Recycling and Sustainability continue to work together to incorporate the availability of translated documents in periodic employee updates and training sessions attended by both existing and new managerial/supervisory personnel. Department of Sanitation officials are updated on the new information from MOIA, availability of translated documents and staff training as warranted.

Language Access in Agency Communications: The DSNY conducts community engagement and outreach efforts to elected officials, community boards, ethnic service organizations and ethnic/foreign language media. Bilingual staff attends meetings (primarily by invitation) and is able to communicate with the public in several languages based on community needs. The Department also provides LEP clients with free information on our website regarding general sanitation issues; materials are available for download and translation.

During major agency-related emergencies/weather events, (i.e., snowstorms), we work with NYC Emergency Management which is the primary conduit for urgent public notifications during emergencies. Press releases and alerts are posted on the DSNY website where they can be translated in various languages. Our language priorities reference and adhere to MOIA's list of top ten languages to address LEP population needs in the targeted area. Education and outreach information is also made available via "mailers" and e-mail notices, media releases and/or media events. Our mailers indicate to readers and LEP clients where they may find access to more information in their language. Recent enhancements to the DSNY website are:

- the addition of a hero on our website's home page with multiple languages directing customers to COVID-19 service advisories, and
- increased use of image-based messaging.

The DSNY continues to work very closely with its counterparts at the New York City Customer Service Center (3-1-1) to provide comprehensive information on Sanitation services and regulations, as well as to Sanitation Service Requests. Since 2001 when it was created, the City's 311 Customer Service Center has served as the Department's "hot-line information center"; 311 and assumed this responsibility for what was then the Sanitation Action Center. The DSNY serves the public, including its LEP clients, via our access point to the public in the form of 311. As a result of the 311 contract for telephonic interpretation services, we are able to provide Language Access Services to Limited English Proficiency customers as warranted.

Unlike most other city agencies, there are no "in-person/walk-in" facilities open to the public operated by DSNY. To assist LEP customers, the Department provides the appropriate signage at our household special waste sites and at the several SAFE disposal events held during the year to assist residents to rid themselves of harmful household products. Due to COVID and budget restrictions, there were no SAFE disposal events in 2020 and the Special Waste Sites were closed for most of the year. Nevertheless, when operational, the use of image-based messaging is used to help LEP participants navigate the sites and events. DSNY staff also maintains consistent contact with the public through regular attendance at meetings with block associations, precinct community councils, school groups, civic associations as well as ethnic service groups.

Plain Language: Our community engagement and outreach staff are a valuable resource used to educate a variety of groups (i.e. property owners or building superintendents, merchants, etc.) utilizing multilingual material as needed. To ensure that our messages are clear and concise, we incorporate the use of plain language into our commonly distributed general information pieces. Our community engagement, outreach, correspondence and messaging teams, receive training in "writing in plain language". Developing and fostering plain writing fundamentals so that staff has a good basis for writing in plain language ensures that our material is understandable and when appropriate, easier to translate for consistent messaging. In 2019 we trained an additional new staff member in plain language as part of their on-boarding process. DSNY staff trained in plain language continue to review written communications/messaging. We plan to continue reviewing and translating print pieces as warranted into the top ten designated languages and other languages as needs arise.

Policies and Procedures: We are looking into redeveloping our language access policies and procedures within DSNY. As we establish more experience in newer methods of communications (social media/website), we'll be revisiting those needs to re-establish and improve on language services protocol as may be warranted.

Our ongoing outreach efforts and community feedback also enable the agency to keep current with communications and messaging to LEP customers. Commonly distributed pieces will be any paper pieces distributed citywide or over 75,000 per year, that are not predominantly images. This includes the How to Recycle and Trash Only Flyers, Organics Collection Brochure and Commercial Mailers and more. In an effort to reduce the rising costs of printing, and in particular, for documents which require updates/revisions as new mandates/laws/codes are implemented, our website links lead to an online

order form at nyc.gov/recyclingmaterials directing LEP clients to PDFs of translated English print pieces in multiple languages; another site, makecompost.nyc.gov manages and houses the translated materials related to composting.

Vendor-based telephonic interpretation and translation services (Voiance and Ericksen Translations, Inc.) have also proven to be a great resource for providing LEP customers referred to DSNY with service-related information.

Notification of Free Interpretation Signage: As stated earlier, the DSNY does not operate/staff “in-person/walk-in” centers so the we do not have interpretation signage as may be the case with other City agencies. Our bilingual staff who participate in community engagement and events wear language identifying tags (I speak X) and use image-based signage and arrows to communicate with and direct the public appropriately at events.

Language Beyond the Top 10: As staff prepares for events throughout the city, they take into consideration the neighborhood(s) that we will be visible in and commonly used information is then made available in languages beyond the top ten if appropriate and feasible; staff attending these events also have access to telephonic interpretation should a LEP customer whose language is not available needs assistance.

VII. Training

Our Language Access Liaison, Debra Barreto and any other “topic” appropriate staff – regularly attend MOIA led workshops and refresher training sessions on a variety of regarding a best practices and guidance on providing LEP services, Local Law 30 obligations and updates, providing easy access to multilingual information, ensuring language access services are readily accessible and available, plain language use and the importance enhancing the LEP experience, just to name a few.

We also update DSNY Department officials and outreach staff on LEP-related services, resources available in other languages, vendor translation/interpretation contracts for services, Language Access Service information and translated material available on our website. Periodic employee workshops and training sessions attended by both existing and new managerial/supervisory personnel, provide awareness and reminders of new practices and language-related resources available to the public and more importantly, ongoing focus on plain language for consideration when developing agency messaging and during their own communications with LEP clients.

VIII. Record Keeping & Evaluation

DSNY’s Bureau of Community Affairs which serves as the agency’s liaison to the Mayor’s Office of Immigrant Affairs periodically review agency language access practices new needs, and available tools to determine their effectiveness and utility. DSNY will use metrics from the contracted language access providers to report requests for interpretation/translation services. We continue to work closely with Eriksen Translations, Inc. resulting in improved communications with the vendor regarding the translation process. Any DSNY related inquiries and requests handled by way of the New York City Customer Service Center -311 are recorded and made available by the appropriate language. We plan revisit current practices to find ways to improve how we capture LEP-related services and information.

IX. Resource Analysis & Planning

The Agency is currently working to renew our contract with Voiance for Language Access Line Services that is available to staff interacting with the public during outreach or customers deferred to our Customer Service Unit from the NYC Service Center 311. The Department works closely with elected officials and the community boards in identified communities about specific programs and ensures that bilingual staff is available to address community needs. Our outreach staff continue to use the DSNY created “Hello I Speak” flier for outreach staff to identify the language spoken by LEP clients to direct them to available material in their primary language and wear badges identify them as being able to communicate in languages other than English, so that LEP individuals will know who can better serve them.

X. Outreach and Public Awareness of Language Access Services

The Department of Sanitation’s Bureau of Community Affairs has a long-term history of working with elected officials, block associations, neighborhood and community groups and ethnic organizations. These working relationships have helped our ongoing outreach efforts and facilitate translation of Department material as needed. Our ongoing efforts include regular contact and meetings with elected officials, neighborhood block associations, precinct community councils, school groups, civic associations and ethnic service groups. DSNY staff are aware of language access protocols including where to direct questions they may have regarding language services.

As the Department’s Language ambassador, the Bureau of Community Affairs works with the Bureau of Recycling and Sustainability staff to:

- coordinate the provision of effective and timely interpretation service for written service requests, complaints, correspondence requiring translation;
- document and report translation services requested and provided;
- coordinate vendor document translations as warranted and telephonic interpretation;
- maintain up-to-date contact information for intra-agency and inter-agency assistance which may be available for language interpretation/translation;
- consult with elected officials and community stakeholders to identify additional languages for specific situations as relevant;
- provide links to contract/vendor translated material or access a translate function on the Department’s website to ensure LEP clients have access to over agency’s information in 100 languages;
- continue developing agency website information options for LEP-related documents and information;
- work with community and ethnic media to disseminate critical information.

XI. Language Access Complaints

Debra Barreto - Deputy Director – Bureau of Community Affairs and Language Access Coordinator, oversees language access complaints forwarded to DSNY. The Department rarely receives complaints submitted in languages other than English. We continue to experience that the NYC Customer Service Center (311) handles the majority of inquiries/complaints requiring interpretation. Language access complaints are typically addressed through 311. On those rare occasions when LEP clients submit service requests by contacting 311, Community Affairs staff triages the request and contacts the appropriate division for investigation. We provide the same attention and prompt response (usually under the 14-day City Hall mandate) to the LEP community. Typically, our contracted telephonic interpretation service makes it possible for us to respond to LEP-related concerns on the day we receive the request. We have also made telephonic interpretation services available to staff. As staff attend training, they are supplied with a guide and participate in orientation workshops on the use of the vendor telephonic interpretation services. We also developed and use a “Hello I Speak” flier and badges for outreach staff to enable LEP customers to identify staff able to communicate with them in their primary language. The public, including LEP customers may submit inquiries, complaints, or requests for DSNY services directly by contacting our Bureau of Community Affairs at: customerservice@dsny.nyc.gov, or by calling our Customer Service Unit at (212) 291-1220.

XII. Implementation Plan Logistics

Debra Barreto, Deputy Director of the Bureau of Community Affairs, is the Department’s official Language Access Coordinator and liaison to the Mayor’s Office of Immigrant Affairs.

The Language Access Plan is implemented by offering translated documents and information on our website where LEP clients may access over 100 languages.

To the extent possible and when available, bilingual staff communicate and interact with LEP clients at local community-based meetings and at table events to explain the event’s current message and provide key information and brochures in their appropriate language. In the next fiscal year, language access line services will continue be available to staff; they will be provided with updates and reminders on the use of the language line services. Most commonly distributed printed educational pieces are translated in multiple languages and wherever appropriate, include imagery to make the information accessible and simple to understand.

During public events such as SAFE Disposal Events, DSNY will have bilingual staff on hand and use of the language access line to assist LEP clients. The Department will also provide signage using imagery and arrows to direct the public.

Lastly, we will continue to collaborate with elected officials and community groups to address any relevant translation issues. The Department will revise its Language Access Plan at least every three years and will post it on the DSNY website: nyc.gov/DSNY.