



LANGUAGE ACCESS TEAM

Cheryl Leon, Associate Commissioner
Borough Operations
New York City Department of Buildings

Lisa Lewis, Language Access Coordinator
Director, Customer Service Operations
New York City Department of Buildings

REQUIRED SIGNATURES

A handwritten signature in black ink that reads "James S. Oddo".

James S. Oddo, Commissioner
New York City Department of Buildings

June 5, 2024

Date

A handwritten signature in black ink that reads "Lisa Lewis".

Lisa Lewis, Language Access Coordinator
Director, Customer Service Operations
New York City Department of Buildings

June 5, 2024

Date



TABLE OF CONTENTS

1. Agency Mission and Services	1
2. Agency Language Access Policy	3
3. Language Access Needs Assessment	4
4. Notice of the Right to Language Access Services	6
5. Provisions of Language Access	6
A. Interpretation	6
B. Translation	7
C. Digital Communication	8
D. Emergency Communications	8
6. Resource Planning	8
A. Bi-multi-lingual Staff	8
B. Language Service Vendor Contract.....	9
C. Partnerships with Community-based Organizations	9
7. Training	10
8. Continuous Improvement Planning	11
A. Data collection and Monitoring	11
B. Language Access Complaints	12
9. Goals and Action Planning	12
10. Glossary, Footnotes, and Appendix	14

SECTION 1. Agency Mission and Services

The New York City Department of Buildings (the Department) ensures the safe and lawful use of more than 900,000 buildings and properties by enforcing the Construction Code, Zoning Resolution, and other applicable laws. Each year it reviews construction plans, issues new and renewed permits, performs inspections, and issues licenses, registrations, and certificates. It facilitates construction by continually streamlining the permit application process and delivers services with integrity and professionalism. Buildings' architects and engineers evaluate construction plans, verifying they meet Construction Code and zoning requirements. Inspectors monitor job sites to enforce building code and zoning regulations, and issue violations when appropriate. The Department issues a Certificate of Occupancy (C of O), which documents the legal use and/or occupancy of a building, when the required signoffs are obtained. Administrative, inspectorial and support staff are dedicated to meeting the needs of the public by providing excellent customer service and developing streamlined operations that are effective and ensure public safety.

Borough office in-person customer service hours are 8:30am to 4:00pm. Ticket kiosks will stop issuing service tickets at 3:45pm for cashier and record room transactions. Phone lines are open 8:30am to 4:30pm, Monday through Friday.

Buildings After Hours is designed for homeowners, tenants, building managers, and small business owners to visit their [local borough office](#) where DOB staff can answer questions and provide the information needed to plan for a home renovation or construction project, address an open violation on a property, obtain more information about a property, or use online resources including the [Buildings Information System \(BIS\)](#) and [DOB NOW](#).

Permits

- Alterations – Room additions, conversions, and Renovations
- Construction Equipment – Fences, Sheds, Chutes, Scaffolds, etc.
- Curb Cuts
- Demolition & Removal
- Electrical Systems
- Elevators
- Fire Suppression Systems
- Foundation/Earthwork
- Fuel Burning/Storage
- Mechanical and HVAC (Heating, Ventilating and Air Conditioning Systems)
- New Building Construction
- Places of Assembly
- Plumbing Systems
- Residential Work – Decks/porches, Garages, Fences, Fireplaces, Pools, Water Heaters, etc.
- Signs
- Sprinklers
- Standpipe Systems
- Subdivisions

For additional information please visit <https://www.nyc.gov/site/buildings/property-or-business-owner/permits-by-type.page>.



The Department issues and renews licenses and registrations to individuals working with our department and/or within the construction trades in New York City. View our [list of license types](#) and requirements.

Licenses

- Concrete Safety Manager
- Concrete Testing Laboratory
- Contractors
- Electrician
- Elevator Licenses & Helpers
- Gas Work Qualification
- Hoisting Machine Operator
- High Pressure Boiler Operating Engineer
- Hoisting Machine Operator
- Oil Burner Equipment Installer
- Plumbing and Fire Suppression (Master and Journeyman) Professional/Inter-Agency Identification Card
- Rigger
- Safety Registration
- Sign Hanger
- Site Safety Professional
- Special Inspection Agency
- Welder

Registrants

- Construction Superintendent
- Filing Representative
- General Contractors

The public may access our social and electronic media on our website nyc.gov/buildings. Citizens will find the latest news and changes at Buildings by staying up to date on a variety of informative materials including:

- [Subscribe to Buildings News](#) and check out our [press releases](#) to stay up to date with news and changes taking place at DOB.
- [Enforcement Bulletins](#) – the monthly bulletin highlights actions taken to sanction and deter bad actors in the construction industry through the enforcement of safety laws and codes of conduct for construction professionals.
- [Sign-up to receive DOB's Weather Advisories](#) to get alerts when the Department advises property owners, contractors, and crane operators to take precautionary measures during extreme weather.
- [Hearing Testimony](#) – read testimony delivered by the Department to the New York City Council

Social Media

- [LinkedIn](#)
- [Facebook](#)
- [Twitter](#)
- [YouTube](#)

SECTION 2. Agency Language Access Policy

Local Law 30 (LL 30) is the City's language access law which improves access to City services for all New Yorkers. LL 30 requires covered agencies to appoint language access coordinators, translate commonly distributed documents into the ten (10) designated languages, provide telephonic interpretation in at least 100 languages, and develop and implement a language access implementation plan. As required the department will provide translations in the following languages: Arabic, Bengali, Chinese (simplified and traditional), French, Haitian Creole, Italian, Korean, Polish, Russian, Spanish, Urdu, and additional languages based on demographics.

Implementation Plan Logistics

The Department's Language Access Coordinator Lisa Lewis oversees the provision of services to Limited English Proficient individuals. This includes contract with Languages, LLC to provide American Sign Language (ASL), telephone interpretation and document translation services. The Department also utilizes internal staff volunteers to serve LEP customers. All Department staff that interacts with the public receives a memo with relevant materials on language access policies and procedures.

Language Access Policy

The Department provides both interpretation and translation services to ensure LEP and ASL individuals have access to the information and services they need. This includes notifying customers of their rights to free language services and enforcing the provision of these services through staff trainings and outreach. Bi-/multilingual Language Access Volunteers receive additional training as required by Local Laws 13 and 15 of 2023 and Executive Orders.

- Creating procedures for requesting translation and interpretation services, including American Sign Language.
- We have contracted with our vendor Languages to provide professional phone interpretation and in-person interpretation and American sign language at internal trainings and meetings. As well as public meetings and events.
- Our vendor Languages provides translation of outreach materials in the ten designated languages mandated under LL30 and over 100 additional Languages.
- We do not recommend the use of family members, friends, or other individuals as interpreters.
- Children are prohibited from acting as interpreters.
 - Non-professional interpreters can alter the dynamic of the conversation and allow for miscommunication. The quality and accuracy of the information is very important as it relates to the various reasons LEP customers may need to contact the Department. It is our responsibility to ensure the information provided is accurate and does not provide false or inaccurate statements.

- The Language Access Team collaborates with the agency's Disability Service facilitator (DSF) to identify areas to align our language access policy with [Local Law 27](#) Disability Access Plan and [DOB's Website Accessibility Statement](#).

SECTION 3. Language Access Needs Assessment

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

Limited English Proficiency (LEP) Population Assessment

As guided by Local Law 30, the Department of Buildings applies the "four factor analysis" as outlined by the U.S. Department of Justice to assess obligations for language access as the basis for its Language Access Implementation Plan. The Department of Buildings utilizes the top ten designated citywide languages to provide services to LEP customers. We vary the delivery of these services based upon the frequency of contact or anticipated contact of LEP customers. Reasonable steps are taken to accomplish our goals but at the point at which costs approach or exceed the benefits, alternative methods of delivery of language services will be evaluated and appropriate changes made.

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

- **FACTOR 1: The number or proportion of LEP persons in the eligible service population.**
The Department determined the proportion of LEP persons identified based on data obtained from 311 and a survey of our customers. Data is also taken from the American Community Survey made available by the NYC Department of Planning. Our 2023 assessment is that less than one percent of customers who visit or contact our borough and central offices are customers who are Limited English Proficient. The Department of Buildings applies the analysis undertaken by MOIA and the Mayor's Office of Operations to use Census data to determine the top six languages spoken by New Yorkers with limited English proficiency, and to use NYC Department of Education data to determine the next four languages spoken by New Yorkers with limited English proficiency. The ten (10) designated citywide languages under Local Law are **Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish.**
- **FACTOR 2: The frequency with which LEP individuals encounter the agency.**
The Department tracks the number of LEP customers we encounter by requiring staff to report via an email detailing their interaction with an LEP customer and indicating whether a bi/multilingual volunteer or the vendor was used to assist with the interaction, including the details of the



interaction. The Department also monitors the monthly billing statements from the language interpretation vendor, Languageers, LLC, to ensure all interactions have been captured.

Number of Interactions

Language	Vendor <i>(Languageers, LLC)</i>	Volunteers <i>(Internal Bi/multilingual Staff)</i>
Chinese Cantonese, Mandarin	48	
Spanish	26	42
Russian	1	
Japanese	1	
Uzbek	1	
Polish		1
Korean	1	
Data from 2023:		

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

It is the Department's intent to provide meaningful access to all customers and eligible individuals with a focus on actions that directly impact public safety including issuance of violations, vacate orders and stop work orders, legal actions, and life and safety notices.

- **FACTOR 4: The resources available to the agency and the costs of providing language services.**

The Department budgets for and utilizes the current vendor contracted by the NYC Department of Citywide Administrative Services, Languageers, LLC for telephone interpretation, ASL and translation services. The Department also makes use of both the citywide and internal bi-/multilingual volunteer language bank

Evaluation of Language Access Needs of Agency’s Service Population

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

While speakers of the 10 Designated Citywide Languages under Local Law 30 account for more than 85% of foreign-born New York City residents with LEP, the Department of Buildings aims to provide language interpretation services to customers who require other languages have access to these services.

To ensure the Department’s team members effectively engage with these identified hard-to-reach communities, we post and provide language identification posters and *I Speak* cards provided by MOIA in all public areas, interpretation and translated materials based on demographics and collaborates with our Community Engagement, Inspection Units and campaigns launched by various units throughout the agency.

SECTION 4. Notice of the Right to Language Access Services

Identify LEP Individuals and their Primary Language

Evaluating the ability of the customer to communicate effectively is essential in providing great service.

- If customers do not verbally identify their primary language, staff are trained to ask for the language that they speak at home.
- If staff cannot identify a LEP customer's language by asking, they are instructed to use a - Language Identification Card that is available at every service location and provided to all inspectors. The message underneath each language states: "Point to your language. An Interpreter will be called."

If the interaction is by telephone and the language cannot be identified, staff is instructed to call Languages, LLC and seek assistance from the vendor to identify the language.

Notification of Free Interpretation Services

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

SECTION 5. Provision of Language Access Services

The Department provides (spoken) interpretation by our existing bi/multilingual staff volunteers and in over 100 languages by our paid vendor Languages, LLC. We continue to identify new volunteers that can provide interpretation services. Types of agency interactions that require interpretation and translation services are:

- In-person office visits, telephone interactions, Inspector visits to properties
- Materials provided on the website, at meetings, outreach, hearings, events and throughout our offices that communicate essential public and worker safety information and by request

A. Interpretation

Ensure Quality of Interpretation Services

The Department uses bi-/multilingual staff interpreters who have demonstrated proficiency in both English and the intended language and received training that includes the skills and ethics of interpreting (e.g., issues of confidentiality), fundamental knowledge in both languages of any



specialized terms or concepts and sensitivity to the client's culture. Interpretation is also provided by our paid vendor Languages, LLC

B. Translation

Ensure Quality of Translations

The Department obtains translation services only from vendors who have a master contract with the City through an extensive RFP process. Vendors have internal proofreading and editing processes. Prior to providing documents to our vendor, they are reviewed to determine if they meet the plain language standards.

Translation of Outreach Materials

- Homeowner Resolution Program
- Green Roof and Solar Flyer

Essential Documents

The OATH Summons/Violation and instructions were updated to meet plain language guidelines and are available in the designated citywide languages on the Department' website.

- Certificate of Correction
- LS-4: No Access Notice
- Stop Work Order
- Vacate Order

Plain Language Guidelines and Standards working group led by the Director of Customer Service, Assistant Commissioner of Strategic Policy & Industry Relations and including the Assistant Commissioner of Communications, Senior Advisor for Policy Engagement and Outreach, and Executive Director of the Administrative Enforcement Unit meets to review documents before public distribution and translation.

Service Notices, Press Releases and Website Content

The plain language working group also reviews notices, releases, and the website to ensure accessibility and translation of this content as appropriate. The language access coordinator will also work with communications staff to expand the translation of the most requested Department documents and engage in outreach with local ethnic press. If requested, we will provide materials agencies or resource from other upon request.

- Community and Ethnic Media outreach materials and literature (i.e., service notices, brochures, flyers, etc.) will be translated and vetted for plain language.
- Informational videos will include translated captioning and voice-over in the LL30 and program languages.
- The Department will also work with community partners to engage LEP New Yorkers from underrepresented communities.



When available, the Department's bi/multilingual staff review translated documents for quality, accuracy, and appropriateness of terminology. Based on customer feedback and standards, internal staff are evaluated for effectiveness in providing translation services. Internal outreach is also conducted to identify staff that is proficient in other languages.

C. Digital Communication

We have television monitors at each location with content that welcome customers in multiple languages. Information on our website is easy to navigate and pages can be translated by clicking on the Translate tab on the top right-hand side of each page.

D. Emergency Preparedness and Response

The Department's Emergency Response Team lead by Assistant Commission, Frank McCarton has access to our vendor Languageurs, LLC and received language access training along with all Department inspectors. A language access representative is on the Department's Continuity of Operations (COOP) planning committee to ensure that NYC Emergency Management protocols are followed. During an emergency the Language Access Coordinator redistributes information for Languageurs, I Speak cards, language identification sheets, and all other relevant materials based on the incident. Materials may include Damage Assessment placards, Vacate Notice, LS4. Language Access Coordinator is available throughout the incident to assist as needed.

We will use our bi-/multilingual language bank volunteers to assist with translation and interpretation in an emergency. The vendor will also be informed we may require expedited translation, ASL and translation services, and may experience a higher volume of calls.

SECTION 6. Resource Planning

• Bi/multilingual Staff

We will continue to utilize bi-/multilingual staff volunteers (25+) as our core resource to support multilingual communications, address language barriers and improve the delivery of how we provide language access services as necessary.

We maintain a list of our language Access volunteer staff on our intranet page. The list includes language(s) the volunteer speaks and contact information. We track the number of interactions on a spreadsheet with the following information:

- How was service provided, Volunteer or Vendor?
- Date and Time of Call
- Language requested
- Reason for call
- Call duration



The following cost-saving measures are currently in place:

- We plan to continue and expand outreach to recruit bi-/multilingual volunteer language bank participants.
 - During New Hire orientations and the nine-week Inspector Academy's we provide an overview of the program and provide the email address of the Language Access Coordinator for staff to request additional information or express their interest in becoming a volunteer. The volunteers are acknowledged during Customer Service Week in October of each year.

Currently we do not have a process or contract to identify, assess and develop the language skills of our bi-/multilingual staff volunteers.

The Department is mindful of the professional responsibility and ethical implications of utilizing internal bi-/multilingual staff (volunteers) to provide language access services. The Department also acknowledges the constraints of Civil Service titles and labor standards and is committed to advance equity and prevent undue burdens for our volunteers. Our bi-/multilingual staff is aware their participation is voluntary. List is maintained and updated by the Language Access Coordinate and shared with Human Resources.

- **Language Service Vendor Contracts**

We currently have a contract with Languagers, LLC for American Sign Language (ASL), translation and interpretation services to assist our LEP customers. We record and maintain interactions monthly. Information is reported annually in accordance with Local Law 6 of 2023.

Vendor Name	Procurement Method	Contract Purpose	Language(s) Provided by Vendor	Contract Period	Total Award Amount of Contract
Languagers, LLC	Purchase Order	Services provided: Translation Interpretation: In-person, Telephonic and Virtual American Sign Language	Over 100 languages	FY '23-24	\$5,000.00
				FY '24-25	\$5,000.00

- **Partnerships with Community -based Organizations**

Partner and collaborate with community-based organizations (CBO) in the future, utilize MOIA and other NYC agencies. We prefer to use our bi-/multilingual staff and paid vendor to provide services to ensure the quality and accuracy of the service to the LEP customer and to prevent any undue hardship to CBOs resources. Currently, we have not identified any gaps in service.

SECTION 7. Training

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

This training is provided during the new hire orientation session for all employees in public contact positions or when a staff member's job description changes and requires contact with the public. In addition, information about language access is included in the annual Customer Operations memo to all staff.

We hope to restart our Customer Service training self-study for all staff between July and December 2024. Inspection staff receive this training in-person while attending Buildings University' mandatory nine-week training academy. The Customer Service Operations Unit maintains a list of all volunteers.

Annually during the month of May a memo is sent to all staff with instruction on how to contact our vendor, links to our intranet page with a link to our internal volunteers and resources.

Training Topic	Target Staff	Method & Frequency	Trainer
How to identify the primary language of a person with LEP	Inspectors New Hires All Staff	In-person - Training Academy - New Hire orientation - Biannually	Deputy Director, Customer Service Operations
	All Staff	Annual Memo	Director, Customer Service Operations
How to track an individual's preferred language	Language Access Liaisons	Annual Memo	Deputy Director, Customer Service Operations
How to track effectiveness of language services are provided to the individual.		Annual Memo	
How to provide culturally and linguistically appropriate customer service to LEP customers.	Inspectors New Hires All Staff	In- person - Training Academy - New Hire orientation - Bi-annually	Deputy Director, Customer Service Operations
	All Staff	Annual Memo	
Legal obligations and agency policy on language access	Inspectors New Hires All staff	In- person - Training Academy - New Hire orientation - Bi-annually	Deputy Director, Customer Service Operations
When and how to use telephonic interpretation	All staff	Annual Memo	Director, Customer Service Operations



Training Topic	Target Staff	Method & Frequency	Trainer
When and how to use in-person interpretation.	Inspectors New Hires All staff	In-person - Training Academy - New Hire orientation - Biannually	Deputy Director, Customer Service Operations
When and how to request translation services.	All staff	Annual Memo -	Director, Customer Service Operations
When to use and not use translation services.	All staff*	In-person, virtual or self-study - DCAS	DCAS

NOTE: Budget and DCAS course offerings will determine frequency of trainings. Self-study and virtual options will be offered based on resources bi-annually.

LL30 Provisions	
§23-1102b (11) Staffing & Contracts	Based on the data we currently have the appropriate resources to serve our LEP customers. Our resources include the Department' bi-/multilingual staff volunteers and contracted vendor.

SECTION 8. Continuous Improvement Plan

A. Data Collection and Monitoring

The Department continuously collects and maintains accurate and reliable data on relevant demographic data and language services by tracking the number of LEP customers served by requiring units to provide a monthly report of the customers who receive services from staff volunteers. We also record data from our vendor's monthly billing statements.

The collected data is used to shape the agency's decision-making processes and strategies for improving accessibility for the agency's LEP customers. The LAC reviews the data to determine if the resources in place are meeting the needs of our LEP customers. Our campaigns and distributed materials are based on demographics and the information provided by our community partners.

The data helps to identify and closes any gaps in our ability to provide language access services throughout the five boroughs.

The collected data is used to determine which additional languages if any are required based on demographics. The Department of Buildings provides translation, and interpretation services as required and is accessible to our customers who require access to these services



B. Language Access Complaints

The Department's Language Access Coordinator oversees the provision of services pertaining to Limited English Proficient individuals. The coordinator has oversight for receiving, tracking, and resolving complaints which includes those from the agency's 311 liaison, calls and emails from the public and external agencies, Commissioner's office, and written correspondences.

Complaints pertaining to service, access to cultural and linguistic appropriateness are handled timely and respectfully. Our goal is to continue to have zero complaints. In the event a complaint is filed we work to address and resolve timely

Protocol

- Record complaint
- Identify issue
 - Translation related?
 - Interpretation related?
 - Quality of service
- Engage with customer utilizing our contracted vendor within one business day.

The number of interactions and absence of complaints filed over the last five years with the agency and through 311 pertaining to language accessibility or requests for additional language services did not necessitate the need to provide this information.

Currently all staff receive this information during various trainings. We will look to incorporate the information in public facing areas with materials, signage, or both at counters.

The contact information for the Department's Language Access Coordinator is provided in the plan and on the department' intranet.

SECTION 9. Goals and Action Planning

Agency Language Access Goals

The Department of Buildings aims to provide meaningful access to services and materials by updating and continuing to implement an agency-specific language access plan for LEP customers with a focus on homeowners, business owners, tenants, and the general public.

The Language Access Coordinator will monitor the efficacy of the Department's plan and compliance with Local Law 30. The plan is implemented by the Language Access Coordinator and monitored by the Deputy Director of Customer Service Operations throughout the year to ensure our goals are met as stated.

Priority Language Access Need	Root Cause	Language Access Goals
Certification for bi/multilingual staff volunteers	Support the recruitment of bi/multilingual Language Access Volunteers. Ability to identify and assign requests for services based on level of competency.	Retain internal bi/multilingual volunteers.

Language Access Goals	Action Step/Milestones	Stakeholders	Timeline
Recruit additional internal bi/multilingual volunteers	Information on how to become a volunteer will be provided during new hire orientation, inspector training academy and annual memo to all staff	Language Access Coordinator and Deputy Director, Customer Service Operations	Ongoing
Create a standalone training guide and presentation on Local Law 30 for all staff	Annual Local Law 30 training	Deputy Director, Customer Service Operations	Start Date: September 2024 End Date: September 2027
Implement plain language guidelines and provide cultural sensitivity resources	Conduct focus groups with front line staff to obtain feedback on our current language access experiences protocols Revise and include feedback and update materials as necessary	Deputy Director, Customer Service Operations	Start Date: September 2024 End Date: September 2027
Expand outreach and availability of language access services at public events	Strengthening internal and external training and outreach initiatives by: <ul style="list-style-type: none"> Continuing to translate documents that affect public and worker safety Continuing to use plain language guidelines and provide cultural sensitivity resources 	Deputy Director, Customer Service Operations Communications and Community Engagement Staff	June 2024 - 2027



Language Access Goals	Action Step/Milestones	Stakeholders	Timeline
	<ul style="list-style-type: none"> Continuing to Include information on invites stating interpretation and ASL services can be provided if notified in advance for both internal and external meetings and outreach events 		
Provide communications to the public in the designated citywide languages, including emergency notifications, alerts, public hearings, events, and press releases.	Materials are translated and communicated as required through various channels	Language Access Coordinator and Communications Staff	Ongoing
Review 28.401.6 to determine if the Department is required to provide language services to licenses and registrants	We meet all Executives Orders and Local Law requirements	Language Access Coordinator	Ongoing

SECTION 10. Glossary, Footnotes, Appendix

The New York City Department of Buildings shall update our language access implementation plan, based on changes in the agency's service population or services, every three years and publish the implementation plan on our website.

The public may contact the Department's Language Access team by calling **(212) 393-2550** or by emailing **DOBCustomerService@buildings.nyc.gov**.