

AGENCY LANGUAGE ACCESS PLAN

NEW YORK CITY DEPARTMENT OF DESIGN AND CONSTRUCTION

2018

I. Introduction and Agency Mission

From the pedestrian plaza in Times Square to the Far Rockaway Library, the Department of Design and Construction builds for New York City. As the City's primary capital construction project manager, we build many of the civic facilities New Yorkers use every day. We provide communities with new or renovated structures such as firehouses, libraries, police precincts, courthouses, senior centers and more. To successfully manage our portfolio, we collaborate with other City agencies, as well as with emerging and world-renowned architects and consultants to achieve our agency mission.

Public Buildings Division

Our Public Buildings Division manages the design and construction of a large range of civic buildings. Some of these projects include facilities for public safety, cultural institutions, and health and human services. DDC has a vast knowledge base in building design, as well as energy saving technologies, and construction methodology.

Infrastructure Division

Our work doesn't stop at buildings—we also design and improve vital infrastructure. New York City has the most extensive network of streets, water mains, and storm and sanitary sewers. We build and upgrade this system, while also taking care of step streets, retaining walls, pedestrian ramps, bridges and plazas. Our client agencies—the Department of Transportation (DOT) and the Department of Environmental Protection (DEP)—furnish the planning and funding for these projects. It's our job to provide the highest standard of engineering design and construction management required for successful delivery. In addition, we help local businesses keep their doors open—through our innovative trenchless technologies which reduce disruption to commercial activities during construction. We provide infrastructure that is essential for a healthy, resilient city.

Office of Community Outreach and Notification (OCON) { Direct Service Area}

Construction can sometimes create inconveniences to businesses and residential communities. Our Office of Community Outreach and Notification (OCON) ensures that communities are heard and informed throughout the construction process. For most projects, a dedicated construction liaison is assigned to help the resident engineer address any community issues and concerns. We also prepare and distribute brochures for our projects that provide specific information, including what's being accomplished, when and where the construction will occur, and who to call if there are concerns.

Community Partnerships and STEAM Initiatives {Direct Service Area}

The Department of Design and Construction's STEAM (Science, Technology, Engineering, Architecture, Mathematics) outreach program serves as an intern and entry-level pipeline for our agency, while supporting schools in providing a holistic educational approach for students. We introduce students and their parents to the broad range of STEAM careers, encouraging empowerment and confidence in students' performance in math and science. Inclusivity is valued during all stages of our work; we strive to share our knowledge and research, as well as create lasting partnerships. Above all, we believe in equal access to information, resources, and communication tools as it relates to STEAM programs and careers. That includes ensuring that parents with Limited English Proficiency understand the benefits of the program and its offerings.

II. DDC's Language Access Policy and Goals

The purpose of this policy is to establish guidelines, for ensuring equitable services and access for individuals with limited English proficiency (LEP).

DDC recognizes the importance of effective and accurate communication between our agency and the city we serve. As part of our policy, we are committed to taking steps to provide timely and meaningful access to information and to ensure that language is never a barrier to opportunity as it relates to the services and information that we provide the public.

DDC has designated the agency EEO Officer, Dalela Harrison, as the Language Access Coordinator ("LAC"). The EEO Officer, and her staff serve as the primary point of contact, for compliance efforts, plan implementation, language services, including interpretation and translation, and ongoing procedural, and programmatic assessments. DDC's Language access plan will be reviewed on an annual basis and the LAC will institute ongoing measures to monitor its success. The LAC and her team will leverage the guidelines and requirements of Executive Order 120 (EO 120) of 2008, and Local Law 30 (LL 30) of 2017, and collaborate with the Mayor's Office of Immigration Affairs (MOIA), in executing the goals of this plan.

Agency Language Access Goals

Guided by LL30 and MOIA, DDC's language access goals are as follows:

- Provide meaningful access to information and services, for all New Yorkers.
- Develop and implement procedures, in compliance with EO 120, and Local law 30 to improve information flow to the public.
- Increase plain language communication regarding agency programing, timelines, construction impact and project completion.

- Enhance community outreach and effective information sharing while remaining responsive to feedback regarding our efforts.
- Train public facing staff, in assisting LEP constituents with language services.
- Encourage multilingual staff to participate in DDC's Voluntary Language Bank.
- Leverage staff and Community Construction Liaisons (CCL's) in providing timely interpretation and translation services, where appropriate.
- Develop an on-going agency campaign to inform members of the public that language assistance services are available for people with Limited English Proficiency (LEP).

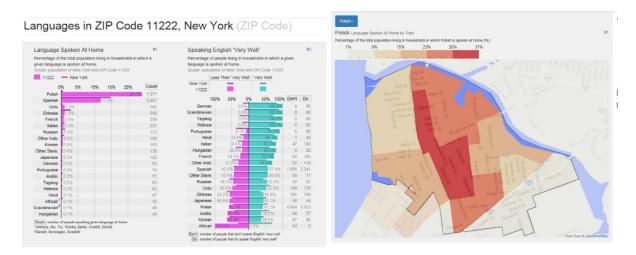
III. LEP Population Assessment

Four-Factor Analysis

DDC is guided by the Department of Justice's Four-Factor Analysis in evaluating the limited English proficient (LEP) populations served by the agency. This methodology provides a balanced assessment of language assistance needs while allowing flexibility to adjust language assistance measures. DDC is committed to providing information and services to diverse population through community outreach, inclusive publication, and language access.

Factor 1: LEP Service Population and Demographic Analysis (Number of LEP in eligible service population- demographic analysis)

DDC builds for all of New York City which includes each of the 5 boroughs and the populations within. In assessing the LEP population served by DDC, we analyze our active and upcoming construction and service areas, by geographic location, using census data, as well as StatisticalAtlas.com which provides composition data regarding race, ethnicity, and language proficiency by zip code.



Factor 2: LEP Data Tailored Specifically to DDC (Frequency agency is in contact with LEP. Incorporate demographic data, agency intake forms, language service provider data, employee survey results)

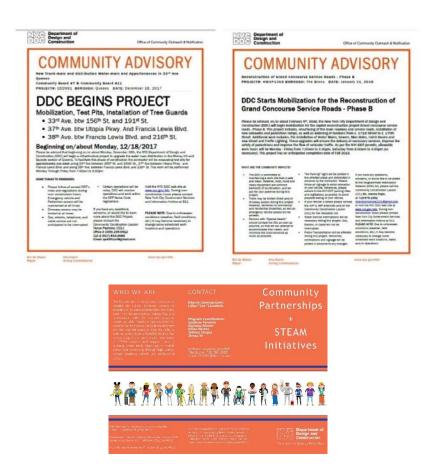
We will continue to utilize data gathered directly from City Council members, by our Office of Community Outreach and Notification, during the development of construction project profiles. We will also leverage the information gathered using our Business and Residential Community Surveys. These surveys were translated into Arabic, Urdu, French, Polish, Spanish, Chinese (Traditional and Simplified), Russian, Bengali, Haitian Creole, and Korean in 2017. Our Community Constructions Liaisons (CCL's) use the community surveys in conjunction with our recently revised language identification guide, to help recognize the primary language of individuals with Limited English Proficiency. DDC will also continue using demographic data surveys, as mentioned in factor 1, to ensure DDC is providing adequate language coverage.

Factor 3: Services Requiring Language Assistance Measures (importance/benefit of service, information and consequence of inadequate interpretation)

DDC recognizes that removing language barriers is critical to achieving greater access and effective communication. DDC's project distribution documents provide transparency to the public about what is happening in their community, and the impacts of planned construction on their neighborhood. These announcements include public notices regarding the location and nature of planned construction, water supply shut off, outages, closures, and other temporary neighborhood impacts. Our Construction Project Information Cards/Fact sheets, Quarterly Newsletters, and advisories are integral to service delivery and information sharing. These documents, along with standard survey forms and the STEAM programmatic brochure for parents and students, are most essential to our communication with the public. On-call Interpretation services are also available to assist CCL's with on-site communication as well.







Factor 4: Resources Designated for Language Assistance Services

- Language Line: Language Line's team includes nearly 9,000 professional interpreters, that are fluent and certified in more than 240 languages. DDC has contracted with Language Line to provide over-the-phone interpretation, as well as, document translation services. The resource is available to CCL's and DDC staff members whose work involves direct interactions with communities, served by our agency.
- Volunteer Language Bank: DDC developed an internal Volunteer Language Bank of multi-lingual staff members who offer written and oral translation support.
- DDC revised its Language Identification Guide to identify the primary language of community members. DDC will provide training to staff on the procedures of identifying the primary language and connecting with Language Line.



IV. Provisions of Language Access Services

DDC utilizes business and residential surveys, also known as project profiles, for canvassing neighborhoods and assessing needs during the pre-construction phase and beyond. Our business and residential surveys have been translated into Arabic, Bengali, Chinese (simplified and traditional), French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu to ensure optimal efficacy for neighborhoods with significant LEP populations. Bi-lingual Community Construction Liaisons/contractors are then assigned to construction sites consistent with community language needs. Project Managers also receive guidance and specific requests from the community boards regarding language needs. In addition, DDC's Language Access Coordinator regularly evaluates language needs using census data, as well as, StatisticalAtlas.com. These assessments ensure the agency is providing necessary language services in the communities we are serving.

Translating Essential Documents

DDC's Office of Community Outreach and Notification regularly distribute Project Information Cards (PIC), quarterly newsletters, and advisories to the businesses and residents in the neighborhoods where construction projects take place. These publications are used to inform the public about project status and the impact and duration of construction. DDC will continue to incorporate plain language principles in the development of these and other essential documents, prior to proceeding with the translation process. In addition, DDC will ensure the quality of final translations through staff and contracted services.

Interpretation Services

CCL's engage with community members throughout all phases of construction. When an individual's preferred language is not easily identifiable, CCL's can utilize our Language Identification Guide to help identify the primary or preferred language of individuals with LEP and contact Language line telephonic interpretation services, as needed. DDC will provide training to CCL's and staff members on the new procedures for respectfully identifying primary language and leverage bilingual CCL's and staff for community translations at construction sites. We will supplement those measures with Language Line interpretation services in more than 240 languages, when on-site translation/ interpretation is unavailable. Finally, we will work to provide interpretation for other agency communications as needed, including outreach events and public hearings. DDC will continue to develop our Voluntary Language Bank, as well as, solicit assistance from the community boards.

Notification of Free Interpretation Signage

DDC will update signage at our construction sites to reflect multilingual communication options and the provision of free interpretation services related to project inquiries. This information will also be available on our agency website. Our website remains available for translation in more than 30 languages through the "Translate This Page" option. In addition, we are working with ITS to ensure that the public can submit complaints and requests for translations or inquiries through our website email link— accessibility@ddc.nyc.gov. DDC's Language Access Plan will be made publicly available on its website and signage will be posted within 90 days of approval of the Language Access Plan.

Emergency Preparedness and Response

In the event of an emergency, DDC will make efforts to provide agency related translation and interpretation services, to the extent possible. In the event that access to our work site is restricted, DDC will update our agency website which has a language translation feature for optimal access.

V. Training

Training will be provided for all current staff in direct service areas within 90 days of approval of the Language Access Plan. We will arrange for training to include best practices as well as components related to cultural competencies and sensitivity. Training sessions will cover DDC's language access policy concerning when interpreter services should be provided, as well as procedures regarding use of language identification guides, identifying an individual's preferred or primary language, arranging for telephonic interpreter services, and recordkeeping and document Tracking. The Language Access Plan and written training materials will be provided to staff and will be available on DDC's Intranet.

VI. Record Keeping and Evaluation

DDC will formulate guidelines and procedures for using language services, including tracking and reporting telephonic interpretation calls, location of site, language translation frequency, and length of call. This data will help assess trends and evaluate service needs and efficacy. In addition, the Language Access Coordinator will track Language service usage by monitoring the charges detailed on monthly invoices to DDC. DDC will utilize our Voluntary Language Bank participants to quality check translated materials, with specific focus on documents that include esoteric words and industry specific terminology.

Maintaining Records

DDC will maintain records pursuant to our records retention schedule and requirements. We will

- Track Language Line interpretations and translation services through invoices and divisional record keeping
- Maintain demographic assessment data for future reference.
- Maintain digital copies of translated documents, by department and document type.
- Maintain names and locations of staff members who are available to act as interpreters.
- Track the number and type of translated documents produced annually
- Conduct Quarterly review of feedback from the public.
- Conduct Annual review of correspondence received via 311 LEP reporting.

VII. Resource Analysis and Planning

DDC will leverage bilingual CCL's and staff for community translations at construction sites; we will supplement those measures with Language Line's translation and interpretation services in more than 240 languages, for additional language assistance support, when on-site translation is otherwise unavailable. We anticipate using existing contracts for interpreter services and training, in addition to developing our own training materials. DDC will utilize the Language Identification Guide to identify the primary language of LEP. DDC will provide training to staff on the procedures of identifying the primary language and then connecting with Language Line. DDC will continue to develop our Voluntary Language Bank, as well as, and solicit assistance in reviewing translated documents.

DDC will look for ways to expedite essential document translation, while maintaining our standard of quality. And we will work with MOIA to identify additional resources in our language access efforts.

VIII. Outreach and Public Awareness of Language Access Services

DDC will increase public awareness regarding the availability of our agency's language access services through a multilayered Language access campaign. Our campaign will encompass messaging and notification distributed digitally and displayed on our agency website, Intranet, as well as at impacted construction sites.

IX. Language Access Complaints

DDC will monitor and respond to public complaints about language access as follows:

- The Language Access Coordinator and team will address all inquiries, requests, and complaints on behalf of DDC.
- The Language Access Coordinator will facilitate resolutions and track response time for reporting purposes.
- Complaints and requests related to language services may be submitted by contacting a
 CCL, by calling 311, by visiting DDC's website, by emailing us at
 accessibility@ddc.nyc.gov, or by calling us at 718-391-1776.
- Complaint data will be tracked quarterly and DDC will include information about complaints as part of our annual reporting.

How members of public can submit language access complaints, questions, and requests	Agency 311 Data (CY 2017)	Description of how complaints/requests were addressed
Currently, through 311. However, the public will also be able to submit language access requests through our agency website, via-email.	# of language access complaints received via 311: 0	N/A
	# of requests for language access services via 311: 0	N/A

X. Implementation Plan Logistics

Language Access Coordinator

DDC designated the Agency Equal Employment Opportunity Officer, as its Language Access Coordinator In 2017. The Language Access Coordinator serves as the primary point of contact for implementing Executive Order 120, Local Law 30 and similar Federal and City mandates and can be reached as follows:

DDC LANGUAGE ACCESS COORDINATOR

DALELA HARRISON, AGENCY EEO OFFICER **DEPARTMENT OF DESIGN AND CONSTRUCTION (DDC)**

DEPARTMENT OF DESIGN AND CONSTRUCTION (DDC)

OFFICE OF EQUAL EMPLOYMENT OPPORTUNITY, EQUITY, AND INCLUSION

30-30 THOMSON AVE, 4TH FLOOR

(718) 391-1776 (718) 391-2815

Accessibility@DDC.NYC.GOV

or

Harrisoda@DDC.NYC.GOV

Language Access Goal and Milestones

Language Access	Milestones	Responsible Staff	Deadline
Goal Launched Voluntary Language Bank. DDC's goal is to have	Our bank currently consist of 8 employees, who are proficient in 9	Language Access Coordinator	On-going effort
2 employee participants for each of the 10 languages required under LL 30.	languages.		
Translated project profile surveys for businesses and residents in the top ten citywide languages required by EO 120, and expanded by LL 30.	Translation complete.	Language Access Coordinator	August 21, 2017
DDC submitted LAIP draft to MOIA.	Completed and received guidelines from MOIA.	Language Access Coordinator	Completed
DDC will submit final LAIP.	Draft was submitted, we are revising the LAIP as required by MOIA	Language Access Coordinator	May 1, 2018
Created and distribute Language Identification Guides	Language Identification Guides were revised and approved on March 14, 2018; DDC is awaiting final printing.	Language Access Coordinator	June 2018
Language plan will available in the 10 languages required by LL 30.	DDC contracted with Language Line and will be able to translate the LAIP, once it is finalized and approved.	Language Access Coordinator	August 1, 2018
Language Access complaints may be submitted on DDC's website.	DDC has established an email account, accessibility@ddc.nyc.gov where complaints can be submitted.	Language Access Coordinator	August 1, 2018
LAIP will be reviewed twice a year.	DDC is finalizing LAIP.	Language Access Coordinator	April 2019
LAIP will be updated on the DDC website once every 3 years.	DDC will track all updates quarterly to ensure efficacy of LAIP.	Language Access Coordinator	April 2021