

Language Access Plan

- I.** Agency: NYC Civic Engagement Commission's Language Access Plan
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II. Mission and Background

In November of 2018, New Yorkers voted for the establishment of the Civic Engagement Commission (CEC) into the NYC Charter. The CEC's mission to enhance civic participation and build public trust to strengthen democracy rests on educating New Yorkers on their rights and responsibilities and providing the necessary services to promote equitable participation in civic life. The Commission is committed to creating partnerships with and supporting the work of community-based organizations, institutions, and civic leaders in their efforts to provide inclusive and diverse opportunities for direct participation in the decision-making process of our city.

The Commission is charter mandated to:

- implement a citywide participatory budgeting program that provides opportunities for all New Yorkers 16 years of age and older to decide how to spend public money for local community projects.
- support the technical and language access needs of Community Boards to create stronger and more inclusive opportunities for the communities they serve.
- expand access to language interpreters at poll sites throughout the city for limited English proficient (LEP¹) voters.
- develop new opportunities to support and partner with local organizations to strengthen civic engagement;
- create accessible and interactive civic education tools and strategies to empower and engage underserved and underrepresented communities.

¹ Limited English Proficient- person who speaks English less than well.

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 10 designated languages, provide telephonic interpretation in at least 100 languages, and develop and implement a language access implementation plan. Consistent with the CEC Poll Site Interpretation methodology and LL30, the Commission will provide translations in the following languages: Arabic, Bangla, Chinese (simplified Cantonese), French, Haitian-Creole, Italian, Korean, Polish, Spanish, Urdu, and Yiddish.

Note: Italian and Yiddish are eligible languages under the Poll Site Language Assistance Program.

III. Agency Language Access Policy and Goals

The Commission's Language Access Policy and Implementation Plan (LAIP) aims to outline the language access supports available to LEP New Yorkers in the CEC's programs and services.

Language access is an integral part of civic inclusion in New York City where 49% of New Yorkers speak a language other than English at home and 23% are limited English proficient. The Commission's goal is to promote and facilitate civic participation for limited English proficient speakers and bridge communication barriers to engage in civic opportunities more equitably. The Commission's Language Access Policy and Implementation Plan considers accessibility to services and information to limited English speakers in all areas of direct engagement, which include:

- Creating protocols for requesting translation and interpretation services, including American Sign Language.
- Contracting professional interpretation vendors to provide over the phone interpretation and providing in-person interpretation at events.
- Contracting translation vendors to translate outreach materials in the ten designated languages under LL30 and the CEC's additional Poll Site Languages: Italian and Yiddish.
- Training CEC on the importance of language access to civic engagement, compliance ordinances, and how to access available language access resources.

- Providing residents direct access to contact the Commission to share feedback, complaints, and request engagement opportunities.
- Conduct outreach in identified languages for poll-site interpretation and in multiple languages for all other information and City services.

Language Assistance Advisory Committee and Poll Site Language Assistance Program

To further meaningful access to the electoral process, the CEC will expand poll site language assistance for LEP New Yorkers and increase awareness of poll site interpretation rights. To accomplish this work, the CEC established a Language Assistance Advisory Committee (LAAC) to provide recommendations for the development and implementation of the program. Consistent with NYC's language diversity, members of the LAAC represent the program selected languages to provide feedback on language access best practices.

Languages Served

The Program will provide interpretation services in the following languages:

- Arabic
- Bengali
- Chinese (simplified Cantonese, Mandarin)
- French
- Haitian Creole
- Italian
- Korean
- Polish
- Russian
- Urdu
- Yiddish

The Commission will provide services in Bengali, Korean, and Chinese (Cantonese, Mandarin) only in counties where the New York City Board of Elections (NYCBOE) is not mandated to provide services in such languages

under the federal Voting Rights Act. **See appendix A for a breakdown of poll site allocations and methodology. ***

Determining the Level of Services for Each Language

Among languages to be served by the Program, the number of poll sites that will receive services in a selected language served will depend on each language's share of the citizen voting age limited English proficient population (CVALEP*) compared to other languages served by the Program.

Program allocations will account for the translation of outreach materials consistent with program language needs:

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

**See appendix A*

Participatory Budgeting Program

The Participatory Budgeting Program aims to bridge continuing gaps in knowledge and literacy about public spending, build trust with local government, and galvanize higher rates of resident participation in decision-making processes impacting New York City. The CEC's Participatory Budgeting Advisory Committee (PBAC) advises on critical program decisions, including the promotion of public education materials and outreach strategy.

The Commission will consult both the LAAC and PBAC to create a style guide and glossary to standardize and provide cultural and programmatic context for the translation of materials provided by the contracted translation vendor.

This style guide:

- informs the translation of subtitles and voice-overs for public service announcements;

- provides consistent translation for ballots, toolkits, and training materials;
- provides consistent oral interpretation for community events
- and is integrated into all online web content, including the CEC's digital civic portal.

IV. Agency Language Access accomplishments and progress on goals from previous LAP

This is the first year that the Commission is submitting a Language Access Interpretation Plan. As a newly created agency, the Commission's language access policy and goals are informed by its core mandates and initiatives. In the last year, the Commission has contracted interpretation, translation, and translation localization vendors to facilitate the provision of language services both for digital and in person outreach.

Community Boards

Over the phone interpretation services were made available to Community Boards as well as trainings and best practices to engage LEP communities in their community district. The Commission is in the process of finalizing an internal site to host all language access resources, trainings, and toolkits.

Poll Site Language Assistance

The Commission's Language Assistance Advisory Committee worked with the Advisor for Language Access and Community Boards to create a style guide to inform the translation of the program methodology and outreach materials used to inform voters about elections. Materials include the translation of four documents that provide voting information about the right to access interpretation services, the creation of three public service announcements translated into the LL30 languages (+ Yiddish and Italian) and provided voice over interpretation. The Commission's expenditures total \$140,250 for the translation and localized advertisement and outreach to LEP communities.

Digital Platform for Resident Participation

The CEC created Participate NYC, a secure open source participatory democracy platform for New Yorkers to connect to the Commission's programs Youth Participatory Budgeting Project. The digital platform is still

in its nascent phase, but it is iterative and will continue to be built in a way where it can be utilized by CEC to create as many engagement features (i.e. participatory processes, civic groups) as necessary over time, and various intake tools (e.g. surveys, proposals, meetings, assemblies) will be associated with each process. A critical part of the design and function of the platform includes localizing the idea generation features of the platform.

Goal	Update
Creating protocols for requesting translation and interpretation services, including American Sign Language.	Completed. Commission created and updates their meeting toolkit to ensure timely delivery of notices to request language services.
Contracting professional interpretation vendors to provide over the phone interpretation and providing in-person interpretation at events.	In progress. The Commission contracted over the phone interpretation services for staff and Community Boards use. However, commission partnered with MOIA for translation of materials, but is currently finalizing contract with translation and interpretation vendor.
Contracting translation vendors to translate outreach materials in the ten designated languages under LL30 and the CEC's additional Poll Site Languages: Italian and Yiddish.	See above.
Training CEC on the importance of language access to civic engagement, compliance ordinances, and how to access available language access resources.	Completed. Staff received a training and overview during staff meeting and are encouraged to attend weekly language access meetings to inform LACC of language access needs.
Providing residents direct access to contact the Commission to share feedback, complaints, and request engagement opportunities.	Completed. The public has direct access to the CEC's online feedback survey and are encouraged to connect with CEC staff for complaints and feedback.
Conduct outreach in identified languages for poll-site interpretation and in multiple languages for all other information and City services.	Completed. The Commission utilized Community and Ethnic Media, community and city partners, and targeted advertisements to reach LEP communities.

V. LEP Population Assessment

In accordance with LL30, the NYC Civic Engagement Commission will utilize the US Department of Justice "Four Factor Analysis" to assess resources needed for the Language Access Policy and Implementation Plan.

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

The Commission utilized citywide information to determine the proportion and number of languages spoken by LEP New Yorkers who require translation and/or interpretation services to access vital services and information.

According to the Department of City Planning's Census data analysis, 49 percent of New Yorkers (3.88 million) speak a language other than English at home, of this population, 23 percent (2 million) are limited English proficient. Expanding on executive order 120, Local Law 30 identified the following ten citywide languages, in order of number of LEP persons: Spanish, Chinese, Russian, Bangla, Haitian-Creole, Korean, Arabic, Urdu, French and Polish.

Under the Charter, the NYCEC can only provide interpretation services in a language if: (1) it is a designated citywide language; or (2) it is spoken by a greater number of LEP New Yorkers than the lowest ranked designated citywide language and at least one poll site has a significant concentration of speakers of such language with LEP. The Poll Site Language Assistance Program's Methodology uses ACS 5---year estimates as they provide a smaller margin of error than 1---year estimates and have an increased statistical reliability for smaller geographic areas and small population groups. The ACS collects samples from 3,143 counties and county equivalents in the U.S. Since 2011, the ACS has sampled 3.54 million housing unit addresses in the U.S. The ACS gathers the following social and economic characteristics needed for the methodology: age, citizenship status, language spoken at home, and English proficiency. No other survey comes close to the scope and breadth of the ACS.

Factor 2: the frequency with which LEP individuals interact with the agency.

The Commission's goal is to regularly engage with all communities through its initiatives, programs, and outreach activities. However, during election periods the Commission's outreach and interactions will target eligible LEP individuals in the following languages: Arabic,

Bengali, Chinese (Cantonese, Mandarin), French, Haitian-Creole, Italian, Korean, Polish, Russian, Urdu, and Yiddish.

Factor 3: the importance of benefit, service, information or encounter to the LEP person:

The Commission seeks to improve equitable participation in the city's democratic and civic processes. It is important that LEP New Yorkers receive information pertaining to civic engagement in the language they feel most comfortable speaking. This includes reaching marginalized communities who are unable to participate in the city's civic opportunities due to a lack of language and/or disability access.

Factor 4: resources available:

The Commission contracts with translation and in-person and telephonic interpretation vendors through the Department of Citywide Administrative Services' (DCAS) language service contracts and participates in the City's Minority and Women owned Business Enterprise Program.

VI. Provision of Language Assistance Services

The NYC CEC provides interpretation and translation services as required by Local Law 30. All notices and information related to the NYC CEC's work will be translated in the City's official 10 languages: Spanish, Chinese, Russian, Bangla, Haitian-Creole, Korean, Arabic, Urdu, French and Polish. Further, New Yorkers may request interpretation services in languages not covered by LL30 by e-mailing the Commission's info box at info@civicengagement.nyc.gov.

Virtual Meetings

Public meeting notices are translated into the target language(s) of the event and contain translated information on how to access interpretation for the virtual meeting (i.e. links, phone numbers, contact e-mail), including American Sign Language and Communication Access Real Time Translation services (CART).

The Commission will conduct all public meetings via WebEx and/or Microsoft Teams for the foreseeable future. Additionally, the Commission has acquired interpretation and livestreaming equipment to streamline interpretation requests and make public meetings more accessible for in-person public meetings (once permitted).

a. Translation Services

The Commission partnered with the Mayor's Office of Immigrant Affairs' Language Services team to provide translation of critical documents related to programming and community outreach, particularly for the translation of outreach materials for voter education. Translation services for public service announcements and digital media were contracted through Splash Studios. Splash Studios sourced bilingual voice actors for the PSA voice over interpretation needs and provided draft materials for quality assurance and review.

Quality review of all translation materials is a critical process for the accurate dissemination of program information and to foster respect and trust in LEP Communities. Quality Assurance review is requested during the translation process and is conducted by the MOIA Language Access team as well CEC bilingual staff, community members and the LAAC.

Contracts and project management for translation requests are processed by the Language Access Coordinator and reviewed by the Advisor for Language Access. A contract for translation services is currently being processed for the remainder of the 2021 fiscal year for Eriksen Translations, a local Brooklyn M/WBE vendor. The Commission prioritizes the translation of LL30 languages for Poll Site Program outreach needs and is currently on track to provide localized translation services for the participatory budgeting digital platform and the NYC Government site.

b. Interpretation Services

Over the phone and in person interpretation services are accessible to CEC staff through the Language Line and Eriksen vendors, respectively. Language Access support for Community Board is a core mandate of the Commission and includes advising on best practices to engage LEP communities.

Community Board have access to services 24/7 in over 200 languages through a contract with LanguageLine provided by the Commission.

Poll Site Language Assistance Program

The Commission provides interpretation services at select poll sites throughout New York City. Target paid advertisements through Community and Ethnic Media are utilized to reach LEP communities located in poll site zip codes. Furthermore, the Big Word, interpretation vendor, is contracted to provide interpreters for Early Voting and Election Day. Interpretation services for programming and community outreach events are included in the scope of work for the M/WBE contracted vendor, Eriksen Inc. The scope of work includes interpretation services for outreach events, public meetings and hearings. The Commission relies on feedback from community leaders, members, and the LAAC to assess the quality of interpretation offered in these public spaces.

c. Language Access in Agency Communications

The Commission has contracted Smartling's services to provide a user-friendly translation experience for LEP New Yorkers who utilize the Commission's online resources and visit the government site for critical poll site information. This provides users human translated content for a more accurate and localized translation experience way and is accessible via desktop and mobile devices.

Looking to remainder of FY21, the Commission's press releases to Community and Ethnic Media outlets will be translated into the targeted communities' language to facilitate greater communication. Community presentations will be translated in target language for greater accessibility and comprehension. While the Commission does not have sufficient resources to translate all meeting transcripts, the Commission is working with the City's Department of Information Technology and Telecommunications to provide Google translations.

d. Plain Language

The Commission follows federal guidelines and best practices for the creation of plain language materials. This includes providing translation and

interpretation vendors glossaries and style guides that plainly convey the Commission's programs and initiatives. The Commission works with the Mayor's Office for People with Disabilities and the Department of Information Technology's Director for web operations to train staff on accessible and plain language publications. Furthermore, the Commission attends the annual Language Access Coordinator Training provided by MOIA and Operations which covers plain language best practices around Quality Assurance/ Quality Improvement.

To ensure quality, the Commission practices incorporate:

- Streamlined file management for translation projects, which includes saving all records and files in OneDrive for ease of access.
- Created Project timelines for staff to follow to communicate feedback to vendors and community partners.
- Procured tools used to produce materials (e.g., Adobe Creative Cloud, Canva).

e. Policy and Procedures

Per the City's open meeting laws, the Commission provides notice to New Yorkers via the City Record, the Commission website, Community and Ethnic Media, and Community Calendars to publicize public meetings and provide instructions on how to request oral and ASL interpretation services. The Communities are also invited to utilize the Commission's intake form to request translation of critical documents. To further access to documents that facilitate the participation of communities in the City's civic processes, the Commission works in partnership with the Department of City Planning to share best practices and feedback from the Community Boards' needs assessment, which included questions regarding access to translation services

f. Notification of free interpretation signage

The Mayor's Office informs members of the public about the availability of free interpretation services through digital and in person outreach, including through multilingual signage and outreach presentations. The CEC developed flyers, palm cards, and uses MOIA's "I speak Cards" to increase awareness about the availability of free interpretation. Moreover, the CEC utilizes the tools created by MOIA and the Department of Social Services found in the Immigrant Resources Portal to notify communities of available language

services. Additionally, staff are instructed to provide translated signage that details to communities and community partners how to request interpretation services.

g. Languages beyond the top 10

The Commission provides translation and interpretation services in additional languages to reach the communities who directly benefit from the Poll Site Language Assistance Program. This means providing interpretation services beyond the City's Local Law 30 languages. Furthermore, the Commission makes additional efforts to engage speakers of languages beyond the ten designated under the law.

In order to ensure that programs engage hard-to-reach, the CEC works with partner agencies to provide interpretation in and translates materials into languages beyond the local law languages:

- Translated materials into 14 languages in response to directed outreach to specific communities during the COVID-19 rapid response phase. These languages include Nepali, Tibetan, Greek, Punjabi, Italian, Yiddish.
- Created a list of the top 5 languages spoken in the Community Districts most impacted by COVID-19 to better integrate Ranked Choice Voting Outreach and program outreach. A breakdown of the top five languages by Community District can be found on the Civic Engagement Commission's "Community District Map" on www.nyc.gov/civicengagement.

h. Emergency Preparedness

In partnership with the Department of Health and Mental Hygiene, the Commission provides guidance to staff and contracted interpreters about the expectations and requirements to continue to provide language access services during an emergency. This includes providing outreach staff and contracted vendors the appropriate gear and conditions to conduct work effectively while meeting the needs of NYC's LEP communities.

The scope of work for the translation vendor includes a rapid response element requiring the delivery of translations into approximately 12 languages, with minimal formatting, of 500 words or less, in less than 24 hours, including some nights and weekends. Further, the Commission supports awareness and guidance related to both health-related initiatives (e.g., COVID-19 testing and

vaccinations), recovery efforts, and assistance to specific initiatives (e.g., Poll Site Language Assistance, Taskforce on Racial Equity and Inclusion).

VII. Training

To ensure that staff are aware of language access services available, the Civic Engagement Support Specialist (CESS) provides an annual training covering access to translation and interpretation services. The training addresses the following:

The importance of language access in ensuring equity and its importance to the NYCCEC's mission;

- The City's legal obligations around language access, including Local Law 30;
- The language services resources available to staff to ensure they can communicate with LEP New Yorkers and how to access those services; and
- Steps staff can take to ensure the quality of multilingual communications.
- Determine the appropriate modality of interpretation services (i.e. consecutive or simultaneous interpretation).

The Language Access Coordinator also provides review trainings on language services and the use of interpretation equipment for staff developing materials or conducting outreach.

The Commission created a language access protocol and a one-pager guide for staff on how to request translation and interpretation services and how to use telephonic interpretation. Staff are invited to the Language Access weekly check-ins to provide updates on language access needs for program outreach to LEP communities.

VIII. Record Keeping and Evaluation

The CESS processes and tracks the translation of materials, as well as requests and fulfillment of interpretation services. The CESS works with the CEC program advisors to review delivery of language services to identify new needs and opportunities for improvement. This review includes an assessment of demand for language services, the CEC's ability to meet demand and manage projects effectively, and any issues encountered with respect to contracted services.

As part of the CEC's strategic planning process, the CESS monitors its compliance with Local Law 30 and the efficacy of its implementation plan. The CESS and the Language Access Advisor review all outreach implementation plans to ensure that:

- a translation timeline that includes sufficient turn-around time for revision and public outreach
- identify target language (s), communities impacted, and determine if there are variations in written formats, including dialects.
- determine whether simultaneous, consecutive, or both interpretation formats will be needed for the event (in-person or virtual).

IX. Resource Analysis and Planning

The Commission allocates \$50,000 for over the phone interpretation services for Community Boards and Commission needs. An additional \$30,000 is allocated for translation services and \$20,000 for technical tools to human translated content. Moreover, the LAC and program advisors provide periodic reviews to improve delivery of language services and to identify gaps in provision. CEC relies on outreach by staff to LEP communities and Language Assistance Advisory Committee, monitors data releases from the Population Division of the Department of City Planning and other sources of demographic information, and works with community partners to identify shifts in language needs and barriers to accessing civic engagement opportunities. This information helps the CEC develop and tailor multilingual information and resources for LEP. Furthermore, the Commission uses digital outreach through ad placements in program languages to reach communities through the web, radio, and print advertisements. The LAAC supports in identifying community organizations to support outreach to communities served by the Poll Site Language Assistance Program. Additionally, the LAAC reviews materials, style-guides, etc. to inform the Commission's messaging.

Outreach and Public Awareness of Language Access Services

The NYC CEC recognizes the need to proactively inform members of the public on the City's obligation to provide language access. An important part of the NYC CEC's work are its collaborative partnerships with and outreach to community organizations. Through these partnerships and outreach, the CEC

works to inform partners about our commitment to language access and build relationships with community and ethnic media to generate trust and transparency.

X. Language Access Complaints

The NYC CEC respects and appreciates feedback about its own communications and engagement practices and strives to eliminate the gaps in language access to its information and services. Members of the public can contact the NYC CEC through multiple channels to make a complaint or request additional language services.

- By mail: 255 Greenwich Street, 9th FL, New York, NY 10007
- Email: info@civicengagement.nyc.gov
- Website contact page: www.nyc.gov/civicengagement
- Telephone (with interpretation available): (646)-769-6026

Any member of the public can also call 311 to make a complaint about language access at the CEC. Language Access complaints are tracked through the intake form. All correspondences are archived and logged. To this date the Commission has not received language access complaints. The Commission

XI. Implementation Plan Logistics

<i>Language Access Goal</i>	<i>Milestones</i>	<i>Responsible Staff</i>	<i>Deadline</i>
<i>Localized translations for digital communications.</i>	<ul style="list-style-type: none"> • Finalize cyber security vetting process 	<i>CESS</i>	<i>Calendar Year 2021, Q3</i>
<i>Integrate localized translation for civic digital portal</i>	<ul style="list-style-type: none"> • Create plan for localized translation and find alternatives to real time translations for community comments. 	<i>CESS and PB Advisor</i>	<i>Calendar Year 2021, Q4</i>

<i>Translation Tracker</i>	<ul style="list-style-type: none"> • Create archive folder for all translated documents and track all documents submitted for translation 	<i>CESS</i>	<i>Calendar Year 2021, Q4</i>
<i>Public Awareness about RCV Education in LL30</i>			
<i>Conduct community workshops for RCV and Poll Site Language Assistance for hard to reach communities</i>	<ul style="list-style-type: none"> • <i>CEC will work to inform the public about access to language services</i> 	<i>CESS in partnership with program advisors.</i>	<i>Calendar Year 2021, Q4</i>

Appendix A

NYC Civic Engagement Commission: Methodology for Poll Site Language Assistance

Languages Served

- ❖ What languages will the Civic Engagement Commission (NYCCEC) provide services in?
 - Arabic, Bengali, Chinese (Cantonese, Mandarin), French, Haitian Creole, Italian, Korean, Polish, Russian, Urdu, and Yiddish¹.
- ❖ Why is the NYCCEC providing services in these languages?
 - Under the Charter, the NYCCEC can only provide interpretation services in a language if: (1) it is a designated citywide language; or (2) it is spoken by a greater number of LEP New Yorkers than the lowest ranked designated citywide language and at least one poll site has a significant concentration of speakers of such language with LEP. ²
 - This methodology ensures service for all languages that are eligible under the Charter.
- ❖ What language assistance services does the Board of Elections provide?
 - The NYC Board of Elections currently provides language assistance in the following counties and languages:
 - New York: Spanish, Chinese (Cantonese, Mandarin)
 - Kings: Spanish, Chinese (Cantonese, Mandarin)
 - Queens: Spanish, Chinese (Cantonese and Mandarin), Korean, Bengali, Hindi, and Punjabi
 - Bronx: Spanish
 - Richmond: Spanish
- ❖ When will the NYCCEC begin providing interpretation services?
 - The general election held on November 3, 2020. This methodology will be used to inform how interpretation services will be provided this November and for all elections thereafter.
- ❖ Will the NYCCEC provide interpretation services during the early voting period?
 - NYCCEC will provide interpretation for the full day on the last two weekend days before Election Day for any U.S. presidential primary, general, or special election for a Citywide elective office or any statewide elective office.
 - The NYCCEC will consider providing interpretation services on additional

early voting days after considering data about early voting utilization over time.

¹ This analysis is based on 2014-2018 American Community Survey 5-year estimates. The program eligible languages may change to reflect changes in the ACS, and/or changes in the designated citywide languages.

² Although Yiddish and Italian are not designated citywide languages, both have more speakers than the lowest ranked designated citywide language and therefore are eligible to be served under this program.

Data Used

- ❖ What data is the NYCCEC relying on to design this methodology?
 - For citywide estimates, this methodology uses current data from the American Community Survey (ACS) 2014-2018 5-year estimates.
 - This methodology also uses the American Community Survey Census Tract 2013-2017 5-year Public Use Microdata Samples for poll site level analysis; this is the most current and accurate data available on resident New Yorkers at the neighborhood level.
 - In addition, the methodology uses data from the Board of Elections on the location of election districts and poll sites.
- ❖ Why is the NYCCEC using data from the American Community Survey?
 - The NYCCEC is using ACS 5-year estimates as they provide a smaller margin of error than 1-year estimates and have an increased statistical reliability for smaller geographic areas and small population groups.
 - The ACS collects samples from 3,143 counties and county equivalents in the U.S. Since 2011, the ACS has sampled 3.54 million housing unit addresses in the U.S. The ACS gathers the following social and economic characteristics needed for the methodology: age, citizenship status, language spoken at home, and English proficiency. No other survey comes close to the scope and breadth of the ACS.
- ❖ Why is the NYCCEC using American Community Survey data about citizenship and voting age? Why not use data about residents and younger New Yorkers? Why not use data on ethnicity and race?
 - The goal of the Poll Site Language Assistance Program is to serve registered voters with limited English proficiency.
 - On an annual basis, the ACS provides a snapshot of changes in this population. In the early part of the decade, the ACS showed the CVALEP population growing by 7,500 annually, by 12,000 annually in the middle part of the decade, and by 25,000 in the most recent period. Thus, the ACS is able to track how this population changes each year – the average increase over the decade was roughly 10,000 per year.

- The best indicator of limited English proficiency in the ACS is a measure of how well a person speaks English. The NYCCEC uses this variable in conjunction with language spoken at home to determine the spread of languages across the City. The ethnic background/self-identified race of individuals is not relevant for data analysis.
- ❖ How often does the U.S. Census Bureau update the American Community Survey? And are there “gaps” in the data because it is not updated frequently enough?
 - The ACS is conducted each year, and it takes several months to prepare the data for public use. If the most recent data were used for the methodology analysis of the CVLEP population, the data would be no more than 14 months old. At the neighborhood level, there is nothing else available on the CVLEP population that would be more current or accurate than the 5-year estimates.
- ❖ If a New Yorker recently became eligible to vote (through naturalization or by turning 18-years-old) would that person show up in the most recent American Community Survey data?
 - If a New Yorker recently became eligible to vote through naturalization or by turning 18-years-old, the most recent ACS sample would reflect this emerging voter population. In the early part of the decade, the ACS showed the naturalized population growing by 15,000 annually, by 37,000 annually by the middle of the decade, and by 45,000 in the most recent period. Thus, the ACS is able to track how this population changes each year – the average increase over the decade was 33,000 annually.
- ❖ Will the NYCCEC update this methodology to incorporate new data from the American Community Survey?
 - The NYCCEC will review its analysis annually to incorporate data from the most recent American Community Survey 5-year estimates.
 - The NYCCEC is charged with reviewing this methodology on or before September 1, 2022 and at least every five years thereafter.

Additional Data Sources

- ❖ Will the NYCCEC use a “surname analysis” of voter registration records? Are these analyses evidence-based and reliable?
 - The NYCCEC will not utilize surname analysis in this methodology.
 - The utilization of surname analysis is an accepted practice to increase accuracy, approved by the Department of Justice over a decade ago. Surname analysis is used as supplementary information to voter registration data or data from the U.S. census. It is never used by itself. If the NYCCEC

uses surname data in the future, it would only be as a secondary source to increase the overall reliability of poll site selections.

- ❖ Will the NYCCEC use data about the utilization of services?
 - The NYCCEC will not use utilization data for selecting poll sites for November 2020. Like surname data, utilization data is a secondary source of data to help validate the poll sites chosen. The NYCCEC will begin to review utilization data as one indicator of demonstrated need, after three general election cycles.

Targeting Poll Sites

- ❖ How does the NYCCEC determine the number of poll sites it will serve for each language?
 - The NYCCEC uses a proportionality approach to allocate poll sites per program eligible language based on each particular language's percentage share of the total CVLEP population.³
- ❖ How does the NYCCEC determine which poll sites it will serve?
 - Interpretation services will be provided in a given program eligible language at poll sites with the highest concentration of persons that speak that particular language and are citizens of voting-age with limited English proficiency. The number of poll sites that receive services in a particular program eligible language will depend on that language's percentage share of the CVLEP population compared to other languages served by the Program.
 - The overall number of poll sites served will depend on the total amount of funds allocated to the program.

Training and Recruitment of Interpreters

- ❖ How will the NYCCEC recruit interpreters?
 - The NYCCEC will recruit interpreters in all program eligible languages through social media channels, job-posting websites, and outreach to community-based organizations, community-based language co-ops, and additional avenues that surface out of the Language Assistance Advisory Committee (LAAC).
- ❖ How will the NYCCEC ensure interpreters are properly trained?
 - The Charter requires the NYCCEC to promulgate rules establishing minimum standards and training requirements for interpreters. All interpreters will be

³ For example, if Russian speakers make up 39% of the total CVLEP population, interpretation in Russian will be provided at 39 out of 100 poll sites.

- screened for customer service skills and receive training similar to the training the BOE provides to interpreters. This includes training on non-electioneering and ensuring voter privacy.
 - Interpreters will be assessed for written and spoken fluency in English and at least one of the program eligible languages. Returning interpreters will continue to be screened on a yearly basis to maintain quality within the program.
 - The interpreter training will be reviewed and vetted by members of the LAAC prior to utilization.
- ❖ Will the public be able to provide feedback on interpretation services?
- The NYCCEC will hold annual public hearings on the training content and quality of interpretation services to allow the public to provide feedback on need and/or experience.
 - The NYCCEC convenes the LAAC quarterly, individuals interested in joining the committee may review the criteria on the NYCCEC website and submit an application.
 - The public is encouraged to submit comments and feedback through the NYCCEC's website to ensure the program is reflective of community need and experience.

Outreach

- ❖ How will the NYCCEC conduct outreach to amplify awareness of the Poll Site Language Assistance Program?
- The NYCCEC will share program eligible languages and correlating poll sites on the NYCCEC's website, build partnerships with CBOs and Faith-based organizations (FBO) to widen distribution of outreach materials, organize days of action leading up to Election Day, and place advertisements in community and ethnic media.

The NYCCEC will also consult the LAAC to develop an outreach strategy and timeline that focuses on building long-term relationships with CBOs and FBOs that have ties to the language communities the Program

