



# Language Access Plan

**Department of Sanitation**

**City of New York**

**Language Access Coordinator**

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## **I. Agency Mission & Background**

### Mission of DSNY

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

## **II. Agency Language Access Goals**

The Department of Sanitation's primary services are to provide communities with refuse and recycling collection, street cleaning and snow removal. These City services do not fully depend upon consumer interaction; however, we are committed to providing Limited English Proficiency (LEP) individuals with free interpretation services and materials developed/implemented by DSNY, in compliance with the Mayor's Office of Immigrant Affairs (MOIA) guidelines. Although, service requests and complaints are handled through the New York City Customer Service Center (311) with its available language-line services, the Department also communicates with New Yorkers through its outreach and educational programs. Our community engagement, outreach and educational efforts are specifically tailored, directed to the public in general as well as used to educate identified neighborhood groups that would benefit from language translation services.

The Department also remains committed to working with elected officials, community groups and immigrant/ethnic service organizations to provide outreach and education about Sanitation services and codes to LEP customers. Along with the use of City Planning demographic/census data, Sanitation staff obtains feedback from local community groups, service organizations and its field staff to assist in determining what language translation(s) may be helpful to a specific outreach or educational campaign. Written translations are based upon the Department's past experience with LEP needs encountered, or as part of community engagement, outreach and educational efforts for which interpretation is requested as necessary. The Agency's primary services (e.g. refuse and recycling collection, street cleaning and snow clearing) are provided geographically on a regular schedule and are not related or dependent upon the need for customer contact.

The Department of Sanitation is committed to updating its Language Access Plan and programs as may be necessary and whenever feasible. The LAP is periodically reviewed and revised accordingly.

### III. Limited English Proficiency Population Assessment

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

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

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

1. Proportion and demographics of LEP persons using the services;
  2. Frequentness of LEP persons come contact with services;
  3. Nature and importance of services provided to LEP persons;
  4. Resources available and costs to recipient.
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1. Proportion and demographics of LEP persons using the services: The Department of Sanitation uses City Planning demographic/census data along with feedback from local community groups, service organizations and its field personnel in determining what language translations may be helpful to a specific campaign. Since the DSNY provides public services which do not require direct contact with the public – the nature of our operations is not client driven - our direct contact with the public in comparison to the types of services provided is minimal.
  2. Frequentness of LEP persons come contact with services: The Department does not operate “in person”/walk-in” centers. However whenever necessary, it serves the LEP community in multiple languages by way of bi-lingual staff who are invited to meetings/events, or with the use of translated material. Although most information may be neighborhood specific, commonly used informational material is available in the top 10 designated citywide languages.
  3. Nature and importance of services provided to LEP persons: While we understand the importance and benefits of communicating with LEP clients in their native languages, the nature of our business does not lend itself to direct interaction with the public. Our business is to keep our City healthy, safe and clean by collecting more than 10,500 tons of residential and institutional garbage and 1, 760 tons of recyclables and enforces the City’s Administrative and Health Code related to Sanitation, clearing litter, snow and ice from 6, 300 miles of city streets.
  4. Resources available and costs to recipient: The Agency’s available resources and costs to LEP clients continue to evolving. Because of our minimal interaction with the public and LEP clients, the NYC Customer Service Center at 311 is our primary source for public requests for services and/or information. Over the years, the DSNY has received very few service requests from LEP clients in languages other than English. On those rare occasions when LEP clients submit service requests by contacting 311,

Community Affairs staff triages the request and contacts the appropriate division for investigation. We provide the same attention and prompt response (typically under the 14-day City Hall mandate) to the LEP community. We are in the process of making language access line services available to staff; they will be provided with a guide and orientation on the use of the language line services.

#### **IV. Provision of Language Access Services**

The Department is in the process of securing its City-wide contract for language translation services. Where in-house or City language bank expertise may be available, efforts will be made to utilize them to translate and vet materials for accuracy in the delivery of information. The volunteer Language Bank remains a valuable source for Language Access needs.

The Department of Sanitation officials are kept informed of the availability of translated documents. In addition, the Bureau of Community Affairs and the Bureau of Recycling and Sustainability continue to work together to incorporate the availability of translated documents in periodic employee updates and training sessions attended by both existing and new managerial/supervisory personnel.

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

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

The DSNY continues to work very closely with its counterparts at the New York City Customer Service Center (3-1-1) to provide comprehensive information on Sanitation services and regulations, as well as to Sanitation Service Requests. The City's 311 Customer Service Center has served as the Department's "hot-line information center" since assuming this responsibility for what was then the Sanitation Action Center in 2001. The DSNY serves the public, including its LEP clients, via our access point to the public in the form of 311. As a result of the 311 contract for over-the-phone interpretation services, Language Access Services are generally available to limited English proficiency customers. In the last year, the DSNY received only one (1) request via 3-1-1 which after investigation, turned out to be non-LEP related.

The Department of Sanitation does not operate “walk-in” facilities which are open to the public similar to those of other agencies. However, in an effort to address LEP customers, the Department provides the appropriate signage at our household special waste sites and at the several S.A.F.E. disposal events held during the year to assist residents to rid themselves of harmful household products. DSNY staff has consistent contact with the public through regular attendance at meetings with block associations, precinct community councils, school groups, civic associations as well as ethnic service groups.

Our community engagement and outreach staff is used to educate a variety of groups of constituents (i.e. property owners or building superintendents, merchants, etc.) utilizing multilingual material as needed. To ensure that our messages are clear and concise, we incorporate the use of plain language when appropriate into our commonly distributed general information pieces. We plan to continue reviewing and translating print pieces as warranted into the top ten designated languages with links directing LEP clients to PDFs of the translated English print in multiple languages available on our website.

Our ongoing outreach efforts and community feedback enable the agency to keep current with communications to LEP customers. Commonly distributed pieces will be any paper pieces distributed citywide or over 75,000 per year, that are not predominantly images. This includes the How to Recycle and Trash Only Flyers, Organics Collection Brochure and Commercial Mailers and more. Due to the rising costs of printing, and in particular, for documents which require updates/revisions as new mandates/laws/codes are implemented, the agency provides a link on our website directing LEP clients to PDFs of English print documents/information translated into multiple languages.

## **V. Training**

DSNY Department officials and outreach staff are kept abreast on Agency resources available in other languages, translation/interpretation contracts for services, etc. Up-to-date Language Access Service information and translated documents are available on our website and updated to reflect new information/translated materials. During periodic employee updates and training sessions attended by both existing and new managerial/supervisory personnel, appropriate staff is made aware of new language-related resources available to the public and for their own communications with LEP clients.

## **VI. Record Keeping & Evaluation**

DSNY’s Bureau of Community Affairs which serves as the agency’s liaison to the Mayor’s Office of Immigrant Affairs will periodically, survey agency users of language access tools to determine, their effectiveness and utility. Using official contracted requests for interpretation/transition services along with the instances LEP customers use the “translate” feature on our website, metrics from the language access provider will be reported. Furthermore, any DSNY related inquiries and requests handled by way of the

New York City Customer Service Center -311 are recorded and available by the appropriate language.

## **VII. Resource Analysis & Planning**

The Agency is currently working to finalize a contract for Language Access Line Services that will be available to staff who may interact with the public. The Department works closely with elected officials and the community boards in identified communities about specific programs such as the organics program and ensures that bilingual staff is available to address community needs. In addition, the DSNY has created its own “Hello I Speak” flyer for outreach staff to identify LEP individual’s language and be able to direct them to the appropriate materials. We also created badges for staff that speak languages other than English, so that LEP individuals will know who can better serve them.

## **VIII. Outreach and Public Awareness of LAS**

The Department of Sanitation’s Bureau of Community Affairs has a long-term history of working with elected officials, block associations, neighborhood and community groups and ethnic organizations. These working relationships have helped our ongoing outreach efforts and facilitate translation of Department material as needed. Our ongoing efforts include regular contact and meetings with elected officials, neighborhood block associations, precinct community councils, school groups, civic associations and ethnic service groups.

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

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

## **IX. Language Access Complaints**

The Department rarely receives complaints submitted in languages other than English. We continue to experience that the NYC Customer Service Center (311) handles the vast majority of inquiries/complaints requiring interpretation. Language access complaints are typically addressed through 311. On those rare occasions when LEP clients submit service requests by contacting 311, Community Affairs staff triages the request and contacts the appropriate division for investigation. We provide the same attention and prompt response (typically under the 14-day City Hall mandate) to the LEP community. We are in the process of making language access line services available to staff; they will be provided with a guide and orientation on the use of the language line services. In the interim, the DSNY has created a “Hello I Speak” flyer for outreach staff to identify LEP individual’s language and be able to direct them to the appropriate materials. We also created badges for staff that speak languages other than English, so that LEP individuals will know who can better serve them.

## **X. Implementation of Logistics**

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

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

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

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

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

## **XI. Milestones**

The DSNY will work towards achieving the following goals in FY19 and FY20:

- Finalize contract with Language Line to provide access to all DSNY employees that interact with the public;

- Train all staff in the Bureau of Recycling and Sustainability, Bureau of Community Affairs and Bureau of Public Affairs in language access protocols and procedures;
- Develop and track all staff training;
- Continue review of educational/informational material for plain language usage;
- Translate the Zero Waste Bookmark into ten languages;
- Re-evaluate the definition of “commonly distributed” to potentially include more pieces based on new usage data;
- Work to improve our language PDFs database to include all flyers.