

# Language Access 2.0: Sharing Best Practices, Improving Services, and Setting Future Goals

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White Paper

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Mayor

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## Message from the Mayor

Immigrants have long been a driver of New York City's success. Recognizing the importance of their contributions to our economic and cultural vitality, we have taken a number of steps to help immigrants participate more fully in our communities.

Our Administration is committed to ensuring equal access to City services, regardless of proficiency in English. With our Citywide Language Access Policy, New York continues to serve as a model of immigrant integration for the rest of the country, and we are proud to showcase our progress and goals with this report.

A handwritten signature in black ink that reads "Michael R. Bloomberg". The signature is written in a cursive, flowing style.

Michael R. Bloomberg  
Mayor

## Message from the Mayor's Office

Across the country, immigration continues to renew and reshape America's cities. Traditional gateways like New York City over time developed the infrastructure necessary to welcome newcomers. Yet persistent barriers to immigrant integration remain that require new and innovative solutions. Many metropolitan areas are experiencing never-before-seen levels of immigration and have had to respond quickly – and sometimes hastily – to the challenge of welcoming and integrating recent arrivals. Despite federal jurisdiction over the issue, gateway cities and new destinations alike are coming to terms with the reality that immigration is local, and local governments will therefore have the greatest responsibility moving forward.

In New York, we have learned this lesson well. Over 180 languages are spoken in our City, which presents a unique challenge for agencies tasked with providing direct public services. Even the most skilled English speaker may at times encounter difficulty in attempting to navigate the complex system of agencies and providers, not to mention someone who is limited-English proficient. Our growing awareness of this reality, along with our commitment to providing quality public services to all residents who are eligible and in need of them, led Mayor Bloomberg to establish a Citywide Language Access Policy, which was signed into law in 2008.

Under this policy, the City of New York has made great strides in providing services to limited-English proficient and immigrant communities, and we believe that our experience provides a strong blueprint for other states and municipalities looking to implement similar initiatives. This document explores the legal framework and history of language access in New York City and also includes a list of recommended best practices and long-term recommendations based on the challenges and opportunities we have encountered.

This white paper aims to document New York City's experience and provide guidance on the questions asked and lessons learned. It aims to assist our colleagues in government to think thoughtfully about welcoming and integrating new Americans. We hope this document is useful and provides guidance.

Sincerely,



Fatima Shama, Commissioner  
Mayor's Office of Immigrant Affairs



Elizabeth Weinstein, Director  
Mayor's Office of Operations

## Introduction

With more than three million foreign born residents from over 200 countries, New York City is home to one of the most diverse populations in the world. Nearly half of all New Yorkers speak a language other than English, and a full quarter are considered limited-English proficient (LEP). Such linguistic diversity creates enormous challenges for City agencies that are tasked with providing direct public services to millions of New Yorkers every day.

The Bloomberg Administration, under the leadership of the Deputy Mayor for Legal Affairs, Carol Robles-Roman, has spearheaded efforts to increase the capacity of City agencies to serve the limited-English proficient (LEP) population. In 2008, Mayor Bloomberg established Executive Order 120 (EO 120), New York's "Citywide Policy on Language Access to Ensure Effective Delivery of City Services," requiring agencies to take reasonable steps to provide language assistance services to LEP persons. The signing of EO 120 was the culmination of years of work toward creating greater access to services, benefits, and information for LEP New Yorkers.

In the years since EO 120 was signed, City agencies have made significant progress in creating and implementing plans for the delivery of language assistance services to the roughly 1.8 million New Yorkers who are LEP. Yet despite numerous successes in reducing the linguistic divide, the Administration understands that there is more work to be done in order to ensure the future of language access in New York City. As part of this continued effort, the Mayor's Office hosted a Language Access Symposium on March 29, 2011, which provided government and community stakeholders with the opportunity to discuss innovative new approaches to responding to the language needs of New Yorkers and to take part in various trainings and workshops around language access.

The result of the Symposium was the establishment of recommendations and guiding principles for ensuring the sustainability of language access. The outcome details are within this report, as well as a more robust historical perspective of language access in New York City, including the legal framework for developing our language access policy. As such, this document aims to

provide guidance to other states and municipalities to better serve the large and growing LEP populations around the country.

## Legal Framework

There are two federal mandates that guarantee the provision of meaningful access to federally-funded programs for limited-English proficient (LEP) individuals. Title VI of the Civil Rights Act of 1964 guarantees that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefit of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”<sup>1</sup> In *Lau v. Nichols* (1974), the Supreme Court interpreted Title VI as mandating that all entities receiving federal funding take steps to ensure that LEP individuals are not excluded from participation in federally-funded programs.<sup>2</sup>

In 2000, President William Clinton issued Executive Order 13166 (EO 13166), “Improving Access to Services for Persons with Limited English Proficiency,” requiring recipients of federal funds to “provide meaningful access to their LEP applicants and beneficiaries,”<sup>3</sup> thereby complying with Title VI regulations and strengthening the rights of LEP individuals to access federally-funded services. President George W. Bush later affirmed his commitment to Executive Order 13166, and the Obama Administration followed suit in 2011.<sup>4</sup>

To assist Federal agencies in carrying out these responsibilities, the U.S. Department of Justice issued a guidance memo in 2002<sup>5</sup> that set forth the compliance standards that recipients of Federal financial assistance must follow in order to ensure that their programs and activities are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI.

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<sup>1</sup> 42 U.S.C. § 200d.

<sup>2</sup> *Lau v. Nichols*, 414 U.S. 563 (1974)

<sup>3</sup> 65 FR 50, 121 (Aug. 16, 2000)

<sup>4</sup> Memo to Federal Agencies from Attorney General Eric Holder Reaffirming the Mandates of Executive Order 13166 (February 17, 2011)

<sup>5</sup> 67 FR 41455 (June 18, 2002)

On the local level, Mayor Michael Bloomberg signed into law a City Council-sponsored bill entitled “The Equal Access to Human Services Act” (Local Law 73)<sup>6</sup> in 2003. Local Law 73 strengthened language access services for limited-English proficient individuals seeking vital health and human services.

## **Language Access in New York City**

Given New York City’s unparalleled linguistic diversity, language access has long been a top priority. For over 20 years, the Mayor’s Office has managed the Volunteer Language Bank (VLB), a citywide database comprised of employees that volunteer their language skills to assist with a variety of translation and interpretation needs for City agencies. In 2003, the Bloomberg Administration reasserted its commitment to ensuring language access for immigrant and LEP residents by offering information through the 311 Customer Service Center in over 170 different languages and expanding the Translation Unit in the Department of Education to ensure that parents who are LEP receive pertinent information in the top eight languages. In 2005, the Mayor’s Office of Immigrant Affairs formed an Interagency Task Force on Language Access, a working group of representatives from over 30 City agencies that meet regularly to share language access best practices and learn about ways to improve their language access service provision.

In 2006, the City established a contract with the interpretation and translation service vendor Language Line in order to provide access to City agencies needing such services at a reduced rate. These efforts strengthened the Bloomberg Administration’s commitment to accessible services for LEP New Yorkers and laid the groundwork for the signing of Language Access EO 120 in July 2008.

With the signing of EO 120, the Mayor’s Office of Operations and the Mayor’s Office of Immigrant Affairs were charged with application and oversight to ensure that all agencies providing direct public services take reasonable steps to develop and implement agency-specific

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<sup>6</sup> New York City Administrative Code, Section 8-1001 through Section 8-1011

language assistance plans regarding LEP persons. Each agency designated a Language Access Coordinator (LAC), who is responsible for liaising with the Mayor's Office and is tasked with the development and implementation of his/her agency's language access plan. Since the implementation of EO 120, the LACs continue to play an integral role in ensuring compliance with their respective agency's language access policy and protocol, serving as the primary point of contact for the Mayor's Office on language access related matters.

City agencies providing direct services were also asked to develop a language access implementation plan. Each plan outlines how an agency will provide meaningful access to the LEP community and includes the following: an LEP population assessment, the process for identification and translation of essential public documents, a method for providing interpretation services, protocol for language access training, descriptions of signage, and systems for tracking and outreach. As part of our effort to increase transparency and promote open government, we have made the 38 language access implementation plans available online at [nyc.gov](http://nyc.gov).

To support agencies in their provision of language assistance services, the Mayor's Office has worked to develop multilingual signage and tools to increase awareness of the availability of language services that are provided at no cost to the LEP community. The Mayor's Office also enhanced the citywide Volunteer Language Bank (VLB) system and launched the NYCertified Language Assessment and Training Program to test and train the City's bilingual employees that voluntarily participate in the VLB to offer their language skills. The NYCertified program was created to enhance the City's ability to deliver quality language assistance services while promoting the professional development of our diverse employees.

In April 2010, the Mayor's Office created a multilingual web portal called the Language Gateway. The Language Gateway was launched to provide essential documents to the LEP community and currently includes 190 documents from 21 City agencies in English, Spanish, Chinese, and Russian. The web portal includes translations of frequently requested documents, applications, forms, and notices on the topics of: Business, Education and Child Care, Employment and Taxation, Health and Public Safety, Housing, Immigration, Social Services, and Transportation and Safety. The Language Gateway serves as a 'one-stop-shop' for the most immediate needs of LEP New Yorkers and the community-based organizations that serve them.

In an effort to further promote the integration of language assistance services within the context of quality customer service delivery, the Mayor's Office developed training curricula on Customer Service, Cultural Sensitivity, and Plain Language for frontline and internal staff, including managers and supervisors. Additionally, the Mayor's Office created several tools to monitor agency progress in implementing language access that include quarterly reporting, survey cards to gather feedback from LEP customers, inclusion of language access indicators in the Mayor's Management Report (the public report card on City services), and site visits conducted at agency public points of contact.

Three years after Mayor Bloomberg issued the Citywide Policy on Language Access, the Mayor's Office of Immigrant Affairs and the Mayor's Office of Operations invited city, state, and federal government officials, representatives from community-based organizations, and other experts to a symposium entitled "*Language Access 2.0: Sharing Best Practices, Improving Services, and Setting Future Goals.*" The half-day language access symposium held on March 29, 2011 brought together key stakeholders to discuss New York City's successes and challenges, exchange ideas, and establish recommendations on the future of language access and the delivery of language assistance services to the City's 1.8 million LEP New Yorkers. The report containing the short-term recommendations can be found at <http://www.nyc.gov>.

## **Recommended Best Practices**

During the last three years, the City has learned about the process of implementing a citywide language access policy. This section details New York City specific recommendations and identified best practices, providing a framework that can be used by other states or municipalities who either are interested in exploring the adoption of a similar policy or are in the beginning stages of implementing such a policy.

### Planning and Initial Implementation

The establishment of a Mayoral-mandated citywide policy highlighted New York City's commitment to prioritizing meaningful access to services for LEP persons and allowed for the creation of a more uniform set of standards for interpretation and translation services across all

direct service agencies. At the same time, rather than delineating concrete rules of compliance, the citywide policy was crafted to allow agencies the flexibility to assess their language access needs by utilizing the four-factor “reasonableness” analysis issued by the Department of Justice (DOJ) in 2002.<sup>7</sup> The following is a list of practices that both ensure standardization and allow room for flexible implementation.

**Ensuring meaningful access begins with a comprehensive, agency-wide plan that focuses on the specific needs of LEP individuals and that contains certain key elements for providing language assistance services.** Executive Order 120 mandated that each agency develop an implementation plan and designate a Language Access Coordinator (LAC) to coordinate and implement the language access policy within that agency. Moreover, agencies were required to have their implementation plans include the following: identification and translation of essential public documents; the provision of quality and timely interpretation services, including telephone interpretation for the top six languages and others as appropriate; procedures for training frontline workers on the language access policy and internal agency protocol; posting of signage in conspicuous locations about the availability of free interpretation services; a measurement and reporting system to capture information about the volume, type, and quality of services provided; and the creation of appropriate public awareness strategies for the agencies’ service populations.

**Conducting internal assessments helps agencies identify their unique priorities and resources as well as the needs of their customers.** Agencies cannot provide language assistance services without identifying the linguistic needs of the communities they serve. In order to build awareness of and sensitivity to the specific language needs of their LEP customers, each agency was asked to conduct an independent assessment of its eligible service population, the frequency with which LEP customers come into contact with the agency, the importance of the benefits and information requested, and the resources available to provide those benefits.

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<sup>7</sup> See 67 Fed. Reg. 41460.

The City recognizes the importance of analyzing demographic data and other relevant information regularly to keep track of and adapt to any changes in the linguistic needs of their service populations. Greater awareness of the languages spoken by LEP persons that come through their doors helps agencies tailor their language assistance services appropriately. Furthermore, the act of conducting independent assessments allows agencies flexibility in determining what services will be offered given the specific needs of their clientele, as well as the ability of each agency to provide various services depending on budgetary and other restrictions.

**The development of templates, checklists and frameworks that agencies are able to customize to fit their operations provides clear guidance and support to agencies.** The development of language access policy directives along with uniform implementation plans and procedures gave agencies clear guidance about their obligations under EO 120. The technical assistance and support offered by the Mayor’s Office throughout the planning and development process, as well as continued support during implementation, has also been important in the overall execution of the language access policy. Additional tools were made available to City agencies to support their implementation plans, which included demographic information about the LEP population, plan templates, signage, language identification cards, and instructions on how to access telephone-based interpretation services.

The development of standardized multilingual signage and other tools provided further support to agencies in the implementation of their language access program. These tools include a Language Identification Poster with the top 22 languages spoken by LEP individuals in the City, an “I Speak…” card that indicates primary language, and a notice of free translation services.

**Educating and training staff to ensure agency personnel are familiar with the citywide language access policy and procedures improves service delivery to LEP New Yorkers.** Improving the delivery of information about City services to the LEP community requires that City agencies increase agency personnel awareness of the citywide policy and practices within their respective agencies. In the City’s continued commitment to prioritize language access as

part of the delivery of good customer service, the Mayor's Office has developed strategies to create greater awareness on the part of both front-line workers, who are typically the first point of contact for LEP individuals, and agency leadership.

Employee training sessions and interagency meetings have provided the greatest opportunities to raise awareness about the citywide language access policy. The Mayor's Office works with agencies to provide numerous training opportunities for front-line staff members and also encourage agencies to incorporate language access curricula into new hire orientation programs and other areas of professional development. Dating back to 2005, the Mayor's Office has also convened quarterly meetings with the designated Language Access Coordinators and Language Bank Liaisons at each agency to ensure continued dialogue on the citywide language access policy and procedures. This opportunity has allowed agency personnel to share best practices, brainstorm approaches to increasing LEP engagement on future initiatives, and continue to build networks to enhance strategies for delivering services to LEP New Yorkers.

### Internal Processes

**Establishing a central administration of the program creates strong coordination for the implementation of language access across agencies.** Prior to EO 120, the position of Language Access Coordinator was established in the Office of the Mayor to coordinate and oversee the language access program and to provide technical assistance and guidance to City agencies. This centrally-located, high-level position continues to play an integral role in ensuring the coordination, oversight, and overall success of the program.

**Including language access within the City's broader customer service program frames language assistance services within a larger, familiar context.** The Customer Service Group (CSG), established by Mayor Bloomberg through Executive Order 115, ensures that every customer who interacts with City agencies receives the best customer service possible regardless of the language in which those services are received. The inclusion of language access within this context allowed agencies to see interpretation and translation services as important components of quality customer service provision to their non-English proficient clients.

Furthermore, the framing mitigated the argument that there was too small an audience to justify investment in the language access program.

**Identification and translation of essential public documents ensures that the most vital information, notices and forms are available to LEP persons.** Whether a document (or the information it solicits) is considered essential depends upon the importance of the program, information, or service involved and the potential consequence to the LEP person if the information in question is not provided accurately. EO 120 defines “essential public documents” as “documents most commonly distributed to the public that contain or elicit important and necessary information regarding the provision of basic City services.”<sup>8</sup> During the last two years, agencies have identified many documents deemed “essential” and translated these documents for the LEP public. This is a work in progress, and the City will continue to identify and translate documents considered “essential” to ensure that LEP individuals have access to these materials. Translated documents are vital to ensuring that LEP persons are aware of services, understand the process for obtaining those services, and can fully access and participate in City programs.

**Identifying and effectively using bilingual employees enhances service to the LEP community.** In an effort to leverage resources, the use of bilingual employees and their skills to provide language assistance to LEP customers can help distribute services more cost effectively and efficiently. For more than 20 years, New York City has identified and utilized bilingual City employees that volunteer their language skills to provide language assistance services within their agencies or sister agencies. The Volunteer Language Bank (VLB) is a database system that maintains a list of all active bilingual employee volunteers and allows City employees to coordinate the translation or interpretation needs of the agency or to liaise with other agencies. The VLB is unique in that it cultivates interagency collaboration in the realm of language assistance services by allowing bi- or multi-lingual City employees to assist in the provision of these services across agencies at very little cost.

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<sup>8</sup> Executive Order No. 120, Citywide Policy on Language Access to Ensure the Effective Delivery of City Services (July 22, 2008)

In the past year, the Mayor’s Office has revamped the VLB to include those tested and trained through the NYCertified Program (see below) and make it more accessible to City employees. In addition, the City has expanded recruitment efforts to enroll more bilingual employees to volunteer in the program. This will increase the total number of translators and interpreters available and diversify the pool of languages and dialects spoken.

**Standardized testing and training of bilingual employee volunteers ensures the quality of interpretation and translation services being offered to the LEP community.** Capitalizing on the diverse language skills within the City’s workforce, the Mayor’s Office launched in 2009 the NYCertified program, which tests the foreign language proficiency of bilingual City employees enrolled in the Volunteer Language Bank. Bilingual volunteers that demonstrate a high level of language proficiency are trained in interpretation or translation. The City offers incentives – such as recognition ceremonies, letters, and certificates – to retain bilingual volunteers and to enhance recruitment efforts with the intent to increase the total number of translators and interpreters available and diversify the pool of languages and dialects spoken.

**The use of plain language principles allows the information to be more easily understood by a broader range of people, including LEP individuals.** Plain language is often thought to be the effort to use simpler words to replace jargon and legalese in agency documents—and it is—but plain language is also much more than that. Plain language is a name for the entire process necessary to make written documents usable by constituents to access the services they need. Not only does this include changes in the words on the page, it also includes changes in policy, changes in process, and changes in perspective. In 2007, the Mayor’s Office issued *Easy-to-Read NYC*, a manual that offers City agencies guidelines for clear and effective communication. Pursuant to EO 120, agencies’ language access plans needed to reflect principles of plain language communication. The Mayor’s Office also created a plain language training program and held “train the trainer” classes to ensure that agencies had the tools they needed to disseminate the tenets of plain language in their agency. Plain language principles are useful both

in communicating with English-speaking customers with low literacy skills and in translating documents into other languages.

**The use of new technologies improves services and leads to cost savings for agencies.** The City uses several on-line and web-based tools to improve services and generate cost-savings in the provision of language assistance services. One of the tools at the City's disposal is the 311 system. Established in 2003, 311 provides government information and non-emergency services in over 170 languages, 24 hours a day, seven days per week. The call center was expanded in 2008 to include social services provided by both government and community-based organizations, thus offering a wider variety of services and information to New Yorkers. Given the expansive language capacity of the 311 system, the City will continue to explore opportunities to increase awareness and usage of the system by immigrant and LEP communities.

In an effort to ensure efficient and cost-effective City operations through new technologies, the Mayor's Office and the Department of Information Technology and Telecommunications (DoITT) established a citywide contract in 2006 for telephonic interpretation and document translation services. Through the bundling of this type of vendor procurement contract, the City increased the availability and consistent delivery of language assistance services across agencies and offers these services to agencies at a reduced rate.

Another tool to enhance language assistance services is the Language Gateway. Through the Language Gateway, New Yorkers can quickly find information on how to apply for public housing, find a job, start a small business, qualify for health insurance and public benefits, and learn about pedestrian safety, parenting tips, and other important topics for City residents. The development of the Language Gateway enhances the City's language access policy, ensuring that technology programs are used to break down language barriers and provide greater access for the public to City services.

## Community Outreach

**Community outreach and education strengthens awareness about the citywide language access policy and city services available to LEP New Yorkers.** Immigrants and LEP New Yorkers encounter challenges in understanding the services and benefits available and knowing how to navigate the City system. The City recognizes the importance of reaching out to immigrant communities and establishing good working relationships with key stakeholders within these communities to expand communication and awareness among LEP New Yorkers. The Mayor's Office of Immigrant Affairs works with agencies and stakeholders to engage the LEP community.

**Civic and community engagement activities raise public awareness about City services and increase the likelihood that LEP persons will access services.** The following are two key initiatives that serve as models for engaging immigrant and LEP communities and raise awareness of not only the availability of free interpretation and translation services but also the array of City services available to New York City residents:

*One NYC One Nation.* A joint initiative of the Mayor's Office of Immigrant Affairs, the New York Community Trust, and the One Nation Foundation, One NYC One Nation was launched in April 2011 and focuses on empowering, educating, and strengthening immigrant and LEP communities throughout the five boroughs. One key programmatic feature of the initiative is the *Know Your Rights and Responsibilities Forums*, which help immigrant and LEP New Yorkers to learn about their rights and protections, as well as opportunities to access City services, through direct conversations with City agency representatives. Interpreters are made available at these forums to accommodate individuals who prefer to communicate in languages other than English. Another program area that engages immigrant and LEP individuals is the Learning English Circles initiative, which offers opportunities for parents of children in the public school system to improve their fluency and gain comfort in speaking English while learning about key City services and learning to see the school building as a safe space for families.

*We Are New York (WANY).* A community project launched in 2009 to help adult immigrants practice English, We Are New York uses a critically-acclaimed television series to help adult

immigrants learn about City services. WANY recently expanded under the Mayor's Office of Immigrant Affairs to work with the Office's broad network of volunteers and neighborhood organizations. In the upcoming months, the initiative will reach additional LEP individuals to inform them and help them better connect to the services and benefits they may be entitled to receive.

**Use of ethnic media increases community awareness of City services and programs.** LEP New Yorkers often rely on ethnic newspapers, radio, and television as their primary means of obtaining information in their language. Thus, utilizing the ethnic media to disseminate messages to the immigrant and LEP communities will help offer targeted information on key issues of interest and importance, bringing greater awareness of topic areas most relevant to LEP and immigrant New Yorkers. LEP individuals who are made aware of available services are more likely to access these services.

**Fostering community-public agency collaborations allows for broader reach and greater access to information for LEP individuals.** Much of the work involved in building stronger community relations within the immigrant and LEP communities depends on the partnerships that agencies establish with not-for-profit organizations, which are the trusted source within these communities. The Mayor's Office will continue to build on its existing relationships with key stakeholders and seek out additional opportunities to form strategic partnerships with community-based organizations, civic leaders, and religious leaders that serve the interests of the immigrant and LEP population in New York City.

### [Measurement and Evaluation](#)

**Evaluating language access programs assists in measuring success, ensures accountability and adherence to standard practices, and provides opportunities to adjust protocol to better meet the needs of LEP New Yorkers.** During the implementation of EO 120, agencies were required to outline not only how they would provide language assistance services to the

LEP community but also how they would measure their success. The plans called for clearly defined measures and specific performance metrics to measure each agency's success in providing timely and accessible language access services, routine data collection, and periodic quality control checks.

Agencies are asked to submit yearly reports with specific milestones, performance benchmarks, and other updates based on demographic changes or priorities. In addition, periodic meetings with agencies are held to discuss their language access milestones and to offer feedback on how to advance language access within each agency. We believe that this process will showcase each agency's accomplishments and objectives to ensure the continued effective delivery of services.

Through interagency collaboration, the Mayor's Office monitors and continues to improve the City's language access efforts with the goal of making City services fully and equally accessible to all New Yorkers. Within the next two years, the City will continue to measure progress by creating new tools or enhancing existing tools, as well as improving accountability and quality assurance measures, to ensure the continued success of language assistance services across agencies.

The City has also invested in reporting systems that assess how agencies are implementing the language access program and how well they have utilized Customer Observing and Research Experience (CORE), a quality assessment tool that tracks service provision. To further maintain accountability and quality assurance, the Mayor's Office will identify key data that all agencies should collect and report.

## **Long-term Recommendations**

During the Language Access Symposium, a number of long-term recommendations were offered for the Administration to explore. These recommendations are not included in the Symposium report, which exclusively covers short-term recommendations that will be implemented prior to the end of the Bloomberg Administration. Nevertheless, they are included here because they are intended to build upon the practices and initiatives currently in place and to serve as a blueprint to ensure the success and sustainability of the City's language access efforts beyond 2013. The

Mayor's Office hopes to begin laying some of the ground work for the long-term recommendations during the remaining period of the Bloomberg Administration.

### Quality Service Delivery

The City is constantly exploring ways to improve the quality and delivery of its services to members of the LEP and immigrant communities to ensure that the Citywide Language Access Policy is implemented to the fullest extent possible. Providing a higher level of service delivery will require increased focus on the way customers access services – with particular attention given to their language and culture – rather than relying primarily on agency-specific information.

**Implement one-stop-shop hubs.** Symposium participants proposed the idea of developing physical sites within neighborhoods with high concentrations of immigrants and LEP individuals in order to facilitate the dispersal of information about City services in the languages most widely-spoken by clients in a way that is culturally relevant. These hubs could be co-located within existing community-based organizations that are already serving immigrant and LEP communities in order to have greater influence within these communities. Furthermore, each hub could provide information about a variety of agencies and services that are identified as being of particular interest to the community in which the hub is housed.

**Conduct feedback studies.** Symposium participants also recommended that agencies consider creating feedback studies to help them learn how their clients prefer to be communicated with (e.g., through flyers, emails, phone calls, letters, etc.) and alter their policies accordingly. Increasing awareness about the preferences of LEP customers will increase the likelihood that they access agency information in a way that is useful to them. New media should also be used to engage emerging immigrant and LEP communities (i.e., sharing messages through videos and social networking sites).

**Create “Babel Block” notices on agency documents.** The use of “babel block” notices at the bottom of documents would allow customers to dial a number to hear a translation of the document that they are viewing. This small, inexpensive change could provide many individuals who are limited-English proficient – and who may also have low levels of literacy in their native language – the opportunity to listen to a plain language translation of vital City information.

#### Accountability and Quality Assurance Systems

**Enhance internal translation capacity.** In the future, agencies should consider creating internal systems of record-keeping that contain all translations so that staff may access translated documents to avoid repetitive translation. Additionally, specialized units for top languages should be instituted in key agencies, following the example of the New York City Housing Authority’s Language Services Unit (NYCHA LSU). This would facilitate easy translation, proofreading, coordination, and reconciliation and would enhance the overall relationship between the agencies and the LEP customers they serve.

**Institute measurement and accountability tools.** Symposium participants recommended that the City consider inventorying the various databases used by agencies to ensure that each database includes primary language as a default (e.g., ACS database Connections). A language tracking form may also be developed for use by the agencies.

**Build in an annual review of documents.** Agencies should review their set of external documents once a year to check for plain language and improve processes for document development to integrate plain language principles. The use of plain language is essential to ensure that limited-English proficient customers – many of whom have low levels of literacy in their native languages – are able to comprehend vital information about services and benefits that may be available to them.

**Explore the feasibility of a central complaint system and protocol.** The City should convene a working group to explore the feasibility of creating a central system for language access related issues that could capture complaints centrally for inquiring or investigation.

### Communication and Awareness

Establishing a number of sustainable measures will institutionalize effective outreach and communication to LEP communities and amongst City agencies long after the current administration. Special focus should be given to how this communication and outreach impacts emergency preparedness and response.

**Increase awareness among immigrant and LEP communities of the availability of free language assistance services and City services.** Explore funding opportunities for creating a 311 campaign on the top issues or topic areas that are most relevant to immigrant New Yorkers.

**Disseminate multilingual messaging information.** Explore funding opportunities to develop a “Know Your Rights” multilingual campaign that could address key information and top areas of interest to immigrant and LEP New Yorkers. This will help increase awareness among the LEP population of the availability of free language assistance services and City services. In April 2008, the City launched 311 Language Access, a multilingual public outreach campaign that targeted immigrants and LEP New Yorkers. Marketing and outreach in Arabic, Chinese, English, Haitian Creole, Korean, Russian and Spanish raised awareness that 311 provides access to social services as well as municipal services, that calls are answered in over 170 languages, and that 311 doesn’t share personal or immigration information with anyone. Outreach was carried out across the City in subways, bus shelters, City agency offices, community-based organizations, check cashing stores, community newspapers, and on street posts. Taxis and official City vehicles also received new bumper stickers reflecting the campaign.

## Areas of Future Focus

There are several broad policy recommendations that might be explored on a citywide basis to improve the capacity of New York City to provide language assistance and ensure that the LEP population continues to receive quality services.

**Enhance interagency collaboration.** Ongoing efforts to build sustainable partnerships between agencies and stakeholders should be pursued, and work with City agencies to create opportunities for building community partnerships should be a top priority.

**Increase usage of new technology.** New technology should become a pillar of citywide language access services. The Mayor's Office should work to ensure that all City employees are trained to use the full range of tools available to them. Additionally, the use of mobile technology to communicate with customers and the creation of real-time feedback mechanisms for clients to evaluate services should be explored.

**Include language assistance provisions in certain City vendor contracts.** Explore the inclusion of language access in future Request for Proposals (RFP) that would require the vendor to engage with populations that will most likely be LEP.

**Offer opportunities to improve a language skill.** Consider a pilot that would assist interested City employees with learning a new language or gaining proficiency in a familiar language.

**Recruit additional bilingual City employees.** In order to increase the capacity of City agencies to handle interactions with immigrant and LEP customers, the City should pursue recruitment of additional bilingual City employees, and job descriptions should be redefined citywide to reflect language needs. In the creation of bilingual titles, deferential payment should also be considered.

## Conclusion

To learn about the progress of these initiatives, or other information regarding these proposals, please visit [www.nyc.gov](http://www.nyc.gov).