



Language Access Implementation Plan

Agency name: Civic Engagement Commission

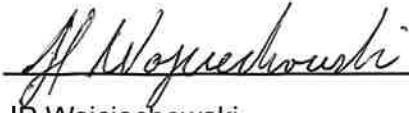
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Published date: 7/29/2024

This Plan includes information about:

1	Mission and Services	Introduces the CEC and our core mission.
2	Agency Language Access Policy	Outlines the language access policy of the CEC.
3	Language Access Needs Assessment	Explains the language access goals for the CEC.
4	Notice of the right to language access services	How the CEC ensures the public knows about their right to language access services.
5	Provision of Language Services	Types of language services provided by the CEC
6	Resource Planning	How the CEC ensures adequate resources to provide language access
7	Training	Types of training provided for CEC staff
8	Continuous Improvement Planning	Details how the CEC will continue monitoring and planning language access improvements
9	Goals and Action planning	Details CEC language access goals
10	Methodology for Voter Language Assistance Program	Publicly vetted methodology that the Voter Language Assistance Program uses to select poll sites and languages.

Signatures



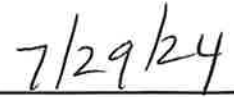
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Language Access Coordinator, Civic Engagement Commission



Date



Dr. Sarah Sayeed
[Chair & Executive Director, Civic Engagement Commission]



Date



I. Mission and Services

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 processes of our city.

The Commission is charter mandated to:

- Implement a citywide participatory budgeting program that provides opportunities for all New Yorkers 11 years of age and older to decide how to spend public money for local community projects.
- Expand access to language interpreters at poll sites throughout the city for limited English proficient (LEP) voters.
- Develop new opportunities to support and partner with local organizations to strengthen civic engagement.
- Support the technical and language access needs of Community Boards to create stronger and more inclusive opportunities for the communities they serve.
- Create accessible and interactive civic education tools and strategies to empower and engage underserved and underrepresented communities.

Local Law 30 (LL30) is the City's language access law which improves access to City services for all New Yorkers. LL30 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 Voter Language Assistance methodology and LL30, the Commission will provide translations in the following languages: Arabic, Bengali, Chinese (simplified and traditional) French, Haitian Creole, Italian, Korean, Polish, Spanish, Russian, Urdu, and Yiddish.

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

II. **Agency Language Access Policy**

The Commission's Language Access Policy outlines 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 proficient¹. 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
- Contracting professional interpretation vendors to provide over the phone interpretation and providing in-person interpretation at events.
- Utilizing contracted translation vendors to translate outreach materials in the ten designated languages under LL30 and the CEC's additional Voter Assistance 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.

Voter Language Assistance Program and Language Assistance Advisory Committee

Through the charter-mandated Voter Language Assistance (VLA) Program, the CEC expands meaningful access to the electoral process for voters with limited English proficiency, by providing voter language assistance at select

poll sites. The CEC also promotes the right to bring an interpreter to a poll site. To assist with this work, the CEC relies on the charter-mandated advisory group, the Language Assistance Advisory Committee (LAAC). The LAAC provides recommendations on the implementation of the program. Each LL30 language community is represented by one to two LAAC members. The LAAC also has members that represent the Italian and Yiddish speaking community.

Languages and Jurisdictions

The Program will provide interpretation services in the following languages:

- Arabic
- Bengali
- Chinese (Cantonese and 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 CVALEP (Citizens of Voting Age with Limited English Proficiency) population 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) for canvassing and outreach purposes will be translated into Program languages.

- The Commission will also work with community partners to engage LEP New Yorkers from language communities covered by the program.

The People's Money

The Participatory Budgeting Program, also known as the People's Money, 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 production and distribution of public education materials and outreach strategies. Each of the four phases of the People's Money process contains a language access component. This includes idea submission form in LL30 and other languages; interpretation services for idea generation sessions and Borough Assembly Committee meetings as needed; translation of core informational and marketing materials into LL30 languages, as well as Italian and Yiddish; translation of paper and digital ballots into LL30 languages, plus Yiddish and Italian. Prompts for online voting are also translated into LL30 languages, plus Yiddish and Italian.

III. Language Access Needs Assessment

In accordance with LL30, the NYC Civic Engagement Commission will utilize the U.S. 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 utilizes 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 and ACS data from 2018-2022, 49 percent of New Yorkers (3.84 million) speak a language other than English at home, of this population, 23 percent (1.79 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, Bengali 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 Voter Language Assistance Program's Methodology uses ACS 5-year estimates as they provide a smaller margin of error than one-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. The ACS gathers the following social and economic characteristics needed for the methodology: age, citizenship status, language spoken at home, and English proficiency.

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 and participates in the City's Minority and Women owned Business Enterprise Program.

IV. Notice of the right to language access services

New York City residents have the right to access information in their own language. 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 (Traditional and Simplified), Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French and Polish. Further, New Yorkers may request interpretation or translation services in languages not covered by LL30 by e-mailing the Commission at info@civicengagement.nyc.gov.

At each poll site covered by the Voter Language Assistance Program, CEC displays "Interpreters Available" signage in the target language of the poll site interpretation services to inform voters of the available service. In sites with multiple languages, signs are multilingual.

Similarly, the CEC develops promotional materials such as flyers and palm cards in English, LL30 languages, Yiddish and Italian. Staff are instructed to provide translated signage that details to communities and community partners how to request interpretation services. While the CEC is not a direct services agency, the CEC will explore tailoring and using MOIA's "I speak" cards at outreach events where bilingual outreach staff are present.

V. Provision of Language Access Services

All CEC program lanes provide interpretation and translation services through contracted vendors. The provision of these services is based on American Cultural Survey (ACS) data and the needs of participants. An important part of the NYC CEC's work is 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.

- Interpretation:
 - The People's Money: The Commission provides interpretation services in all stages of the People's money process including Borough Assembly Committee meetings, launch events, and get-out-the-vote events, based on anticipated participant needs.
 - Voter Language Assistance Program (VLA): The Commission provides interpretation services at select poll sites according to publicly vetted methodology. The extent of services may vary from election to election, depending on available resources and type of election (primary or general). The CEC provides interpretation services at 15-30 unique poll sites on the last two days of the Early Voting period, and 70-80 unique poll sites on Election Day. In partnership with a language services vendor, interpreters are

recruited and screened for bilingual proficiency and customer care skills. Interpreters are staffed in VLA languages

- Public Meetings: Public meeting notices contain information on how to request language interpretation services. The Commission will conduct public meetings in person or virtually via WebEx and/or Microsoft Teams. Additionally, the Commission will utilize interpretation and livestreaming equipment to streamline interpretation requests and make public meetings more accessible for in-person public meetings as needed.
- Community Boards: The CEC provides Community Boards with access to over the phone and video remote interpretation services 24/7 in over 200 languages. This is provided through a contract with Language Line provided by the Commission.

- Translation Services

The Language Access Coordinator (LAC) processes and tracks the translation of materials, as well as requests for and fulfillment of interpretation services. The LAC 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.

Contracts and project management for translation requests are processed by the Language Access Coordinator and reviewed by the Director for Poll Site Language Services. A contract for translation services is currently in effect until September 2024 with Eriksen Translations, a local Brooklyn-based M/WBE vendor. The Commission prioritizes the translation of LL30 languages, plus Yiddish and Italian for Voter Language Assistance Program outreach needs and is currently providing translation services for the participatory budgeting digital platform and the NYC Government site.

The Commission follows best practices for the creation of plain language materials, aiding in the clarity for translated documents. 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.
- 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).

○ Digital Communications

The Commission uses digital communication and outreach in all program lanes. This includes social media posts, digital ad placements, emails, and other forms of digital content. These are provided in LL30 languages (plus Yiddish and Italian) to reach communities.

The Voter Language Assistance Program has revamped posters and digital outreach materials in LL30 languages (plus Yiddish and Italian). The materials inform voters of the right to bring an interpreter with them to the polls and CEC's voter interpretation services. The award-winning PSA was voiced over and subtitled in all the LL30 languages plus Yiddish and Italian. The CEC posts these translated outreach materials online in the Election Center portion of Participate.nyc.gov. We also post, a Know your Rights FAQ that is available in LL30 languages, as well as Yiddish and Italian.

Participate.nyc.gov hosts content related primarily to the People's Money citywide participatory budgeting process. This site has a built-in translation widget that makes the information about participatory budgeting accessible to all, regardless of English proficiency. During the participatory budgeting voting phase, human translated ballots as well as human translated website prompts are utilized covering LL30 languages plus Yiddish and Italian.

The Commission's .gov website also displays all information pertinent to its mandates and programs that through built-in translation widget can be accessed by LEP New Yorkers.

○ Emergency Communications

While the Civic Engagement Commission is not a direct services agency, the Commission collaborates with City agencies to disseminate important

information to residents. The Commission has included in the scope of work for the translation vendor 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. The vendor contracted for translation services supports languages outside of LL30 languages and will provide services depending on needs.

VI. Resource Planning

- Bi-/Multi-lingual staffing

While the CEC is not a direct services agency, the Commission has conducted a survey of staff members regarding their language abilities. Employees utilize their language skills at outreach events as appropriate and to assist with translation reviews. As of June 2024, the CEC has staff members that speak four LL30 languages (French, Spanish, Chinese, and Urdu) and three additional languages not covered by LL30 (Italian, Albanian, and Tigrinya.)

- Language Assistance Advisory Committee

The Language Assistance Advisory Committee (LAAC) is a charter-mandated advisory group consisting of volunteer members that plays a vital role in the implementation of the CEC's Voter Language Assistance Program and advancing language justice. The LAAC advises on and conducts outreach to language communities covered by the VLA and conduct research on VLA language communities. Additionally, the LAAC reviews informational materials, advises on appropriate style-guides, etc. to inform the Commission's messaging. The LAAC also assists with the review of translated materials to ensure linguistic accuracy and cultural sensitivity.

- Language Service Vendor Contracts

The Commission allocates roughly \$1M annually to poll site language assistance interpretation services, including recruitment, training, and program logistics. In addition, the Commission allocates \$100,000 (subject to change) for translation services and interpretation services for other Commission program lanes biannually. Also, \$5,000 annually (subject to change) is allocated exclusively for over-the-phone interpretation services for Community Boards and Commission needs. Moreover, the LAC and program advisors provide periodic reviews to improve delivery of language services and to identify gaps in provision.

To identify shifts in language needs and barriers to accessing civic engagement opportunities, the Commission gains insights from Engagement team, the LAAC and community partners and, monitors data releases from the Population Division of the Department of City Planning and other sources of demographic information. This information helps the CEC develop and tailor multilingual information and resources for LEP. Furthermore, the Commission conducts public outreach through ad placements in program languages to reach communities through web, radio, and print advertisements.

Language Service Contracts Active in FY24

Vendor name	Procurement method	Purpose of the contract	Language(s) provided by the vendor	Period of contract	Total award amount of contract
Eriksen Translations	MWBE Non-Competitive Small Purchase	<i>Interpretation, Translation</i>	<i>All LL30 languages, plus Italian and Yiddish, additional languages as needed</i>	<i>September 2022 – September 2024</i>	\$100,000
Language Line	Micro purchase	<i>Over the phone interpretation</i>	<i>200+ Languages</i>	<i>June 2023 – June 2024</i>	\$5,000
TheBigWord	Amendment	<i>On-Site Interpretation for Voter Language Assistance</i>	<i>VLA Languages</i>	<i>September 2020 – September 2024</i>	\$2,920,920.49*

**The total award amount of contract represents the entire contract period. FY24 spending was \$965,706.62.*

- Partnership with CBOs

The Commission partners with CBOs to assist with the outreach and the voting process for the People’s Money. These CBOs distribute ballots in LL30 languages, Yiddish, Italian, and more. Some partners conduct get-out-the-vote events in LL30 and other languages, based on their constituents’ needs. This is to ensure that the People’s Money is inclusive of all New Yorkers regardless of language spoken. The Commission regularly evaluates the partnership and outreach strategies to ensure participation from New Yorkers of all backgrounds. This includes tracking which

community partners are doing outreach in different languages and evaluating utilization data for both the online participate voting website and paper ballot counts.

VII. Training

To ensure that staff are aware of language access services available, the Language Access Coordinator provides an annual training covering access to translation and interpretation services. The training addresses the following:

- 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
- Steps staff can take to ensure the quality of multilingual communications;
- The importance of language access in ensuring equity and its importance to the NYCCEC’s mission;
- Determine the appropriate modality of interpretation services (i.e., consecutive, or simultaneous interpretation).

The Language Access Coordinator also provides annual 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.

Language Assistance Advisory Committee (LAAC)

LAAC members offer research on the language communities that they represent. The presentations, include demographic information, historical information, barriers to civic engagement, and methods for successful outreach. The LAAC also convenes once per year in person. This meeting is a “bootcamp” where the CEC alongside partner agencies trains LAAC members on organizing and outreach tactics, social media use, interviewing techniques, and more.

Community Boards

The CEC provides yearly training on language access for Community Boards. This training includes an overview of LL30 provisions, how to effectively use tools such as the [NYC CEC Community Language Profile Map](#) to reach LEP communities,

planning for language services, and information on the Voter Language Assistance program.

VIII. Continuous improvement planning

○ Data Collection and Monitoring:

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

- Target language(s) are identified using the most recent ACS data, communities impacted.
- Translation timelines include sufficient turn-around time for revision and public outreach.
- The appropriate mode for interpretation is selected (simultaneous, consecutive) or if both interpretation modes will be needed for events (in-person or virtual).

○ Complaints

- The CEC respects and appreciates feedback about its own communications and engagement practices and strives to eliminate the gaps in language access for 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: 22 Reade Street, 4th FL, New York, NY 10007

Email: info@civicengagement.nyc.gov

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 correspondence is archived and logged. To date, the Commission has not received language access complaints. The Commission will address reported concerns related to Language Access promptly.

IX. Goals and actions planning

<i>Language Access Goal</i>	<i>Milestones</i>	<i>Responsible Staff</i>	<i>Deadline</i>
<i>Develop CEC-wide translation style guide for all program lanes.</i>	<ul style="list-style-type: none"> • Determine preferred translations for all CEC programs and related terminology in CEC languages • Create a single document detailing formatting of translations for uniformity • Will provide for consistent translation of ballots, toolkits, training materials, community presentations, and multilingual web content 	LAC	FY25/FY26
<i>Create centralized request portal for language service requests</i>	<ul style="list-style-type: none"> • Retire current form which is integrated with 	LAC	FY25

	<p>other office requests</p> <ul style="list-style-type: none"> • Launch and maintenance of new request form via Airtable 		
<i>Expand training for new hires during the on-boarding process</i>	<ul style="list-style-type: none"> • Revise on-boarding procedures to include more detailed information on the efforts of language access at the CEC 	LAC	FY25/FY26
<i>Create of Language Access Methodology for the People's Money</i>	<ul style="list-style-type: none"> • Methodology will be used to target LEP New Yorkers for all phases of the People's Money • Use data driven approach to develop multilingual outreach strategies 	LAC / Director for Poll Site Language Services	FY25/26
<i>Establish monthly Language Access office hours</i>	<ul style="list-style-type: none"> • Staff will be invited to the Language Access monthly office hours check-ins to • Will advise CEC staff on language access needs for 	LAC	FY25

	<p>program outreach to LEP communities.</p> <ul style="list-style-type: none"> • Will provide updates on Language Access Initiatives 		
<i>Provide annual Language Access Training for Community Boards</i>	<ul style="list-style-type: none"> • Overview of LL30 • Available tools to target LEP populations • How to arrange language services 	<i>LAC</i>	
<i>Voter Language Assistance Program</i>			
<i>Contract vendor for Voter Language Assistance program for poll site interpretation</i>	<ul style="list-style-type: none"> • Vendor submissions • Selection committee • Contract finalized 	<i>Director of Poll Site Language Services and LAC</i>	FY25

Appendix A

NYC Civic Engagement Commission: Methodology for Voter 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 Yiddish.
- Why is the NYCCEC providing services in these languages?
- - 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. 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.

Data Used

- What data is the NYCCEC relying on to design this methodology?
 - For citywide estimates, this methodology uses 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 Voter 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. 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 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 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 undergo refresher training for customer service skills at least once a year.
- 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 monthly, individuals interested in joining the committee may review the criteria on the NYCCEC website and submit an application during the submission period
 - 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 Voter 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