



## Language Access Implementation Plan

The Language Access Implementation Plan explains how the agency will provide services to people who have limited English proficiency (or LEP).

Agency name: FDNY

Language Access Coordinator name: Steven Ertrachter

Language Access Coordinator title: Executive Director of Licensing

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This Plan includes information about:

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8	Continuous improvement planning	How the agency ensures ongoing improvement of language access
9	Goals and actions planning	How the agency will put the plan into action

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## Signatures



Date: 7/01/2024

*Steven Ertrachter, Language Access Coordinator  
Public Certification Executive Director, FDNY*



Date: 7/16/2024

*Laura Kavanaugh  
Commissioner, FDNY*



## Section 1. Agency mission and services

The Fire Department (FDNY) provides services including:

- Responding to fires
- Providing Public safety strategies
- Responding to medical emergencies
- Responding to disasters
- Responding to terrorist acts
- Performing inspections and testing
- Licenses and Certifications

The FDNY protects the lives and property of NYC residents and visitors. The FDNY advances fire safety through its prevention, investigation and education programs, and contributes to the City's homeland security efforts. It responds to more than 300,000 fires and non-fire related emergencies and more than 1.5 million medical emergencies each year. The FDNY maintains approximately 250 firehouses and ambulance stations.

FDNY's Bureau of Fire Prevention certifies individuals and inspects various locations that are regulated by the NYC Fire Code. In addition to providing study materials to prepare for each exam, the FDNY provides information to numerous industries that have potential hazards.

### **THE SERVICES THAT ARE PROVIDED BY THE FDNY TO THE GENERAL PUBLIC INCLUDE:**

- Fire Suppression
- Emergency Medical Service
- Fire Prevention Inspections
- Certificate of Fitness Licensing
- Fire Safety Education
- Fire Investigation

### **FDNY INTERACTS WITH THE PUBLIC:**

- during emergency situations;
- via inspections;
- via field and/or by home visit;
- over the phone and via electronic mail/fax;
- through different Certificate of Fitness seminars, classes and/or examinations;
- via public hearings, as well as other public events (such as forums, town halls, and during fire prevention week).

The FDNY's Bureau of Fire Prevention (BFP) has approximately 400 Fire Protection Inspectors, who inspect equipment and component parts of buildings for permitting and licensing. They also observe system tests. BFP conducts over 250,000 inspections each year.

BFP has distinct units responsible for different kinds of inspections. These include, among others:

- **Bulk Fuel Safety Unit** whose inspectors inspect motor fuel storage systems at gas stations;
- **District Offices** inspectors typically issue FDNY violations and track renewals / inspections for FDNY permit accounts;
- **Explosives Unit** inspects and issues permits for explosives, fireworks and special effects;
- **Fire Alarm Inspection Unit** witnesses tests of new or altered fire alarm systems in the commercial buildings;
- **Fire Suppression Unit** witnesses tests of the sprinkler and standpipe systems;
- **Public Safety Unit** that inspects high-rises and places of public assembly such as daycare centers, pre-K programs, etc.

The fire operations field activities are performed by the uniformed personnel and are called “risk-based” and “mandatory” inspections (formerly AFID). There are about 43,000 risk-based inspections and 61,000 mandatory inspections conducted each year.

## Section 2. Agency language access policy

The FDNY’s language access policy is to provide interpretation and translation services to all Limited English Proficiency (LEP) customers. When applicable, forms and pamphlets are translated into multiple languages as required. When FDNY employees speak the native language of the Limited English Proficiency (LEP) customers, the employees will assist with interpreting basic information to provide the best possible customer service. When an employee is not available, Language Line is used for in person interpretation.

Through interpretation and translation, FDNY continues to make sure important safety messages reach all New Yorkers in a way that they can understand.

To comply with Local Law 30, the FDNY always translates documents that are useful to the public in order to carry out its mission and protect the lives and property of New York City residents and visitors.

### Section 3. Language access needs assessment

**FACTOR 1: THE NUMBER OR PROPORTION OF LIMITED ENGLISH PROFICIENCY (LEP) PERSONS IN THE ELIGIBLE SERVICE POPULATION** FDNY's service area includes the 5 boroughs of New York City. With almost 500K people estimated LEP households within the 5 boroughs, it would be extremely difficult to estimate the number of LEPs that access services through emergency services and/or testing at the FDNY.

**FACTOR 2: THE FREQUENCY WITH WHICH LIMITED ENGLISH PROFICIENCY (LEP) INDIVIDUALS COME INTO CONTACT WITH THE AGENCY**

The data provided from the Language Line also shows that top 3 requested Language Line languages for the year were Spanish #1, Russian#2, and Mandarin #3, the rest of the languages fluctuated.

FDNY comes in contact with individuals with LEP daily, either through emergency contact, testing or community events.

Community events take place at location such as:

- Community centers;
- Senior center facilities;
- Pre-school, elementary and high schools;
- Firehouses;
- Other places of assembly.

Fire safety presentations are done in schools throughout the city and specifically target neighborhoods that have experienced fatal fires.

Based on community make-up or by request, the FDNY brings language-appropriate materials. Many of our fire safety events require some translated materials. Fire safety educators bring English and other popular language materials to all events, especially at the larger public events. The FDNY inquiries about the language needs prior to events.

At fire safety events following fatal or serious fires, community needs are assessed with the community organization coordinators.

In addition, general statistics show that some of our services are more frequently provided in the City's minority and economically distressed communities that may have larger LEP populations.

When an applicant/client calls, visits, or encounters FDNY's office(s), or when FDNY employee enters applicants' premises (whether its work or home) language must not be a barrier to the receipt of appropriate services.

This Language Access Implementation Plan reflects FDNY's commitment to providing language access services and meeting the following over-arching goals to:

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- Ensure that language is not a barrier to FDNY services;
- Ensure that all applicants and clients have equal access to the services for which they are eligible, regardless of the level of their English proficiency;
- Inform all FDNY applicants and clients that free interpretation services are always available; and
- Train front-line staff on the importance of ensuring access to free interpretation services for all LEP clients.
- Additionally, community affairs effectively perform outreach and engagement with LEP communities, and entities that represent their interests, are critical parts of language access planning efforts—both to increase access to component programs and activities for these communities.

### **FACTOR 3: THE IMPORTANCE OF THE BENEFIT, SERVICE, INFORMATION, OR ENCOUNTER TO THE LIMITED ENGLISH PROFICIENT (LEP) PERSON**

FDNY offers LEP assistance, on as needed basis, to the people while providing services as we realize that access can be limited due to language barriers. FDNY's mission is to protect life, property and overall and safety, and in order to continue that goal, language access is very important. To achieve this goal, FDNY conducts inspections throughout the 5 Boroughs of New York City, including communities where English may be limited. Lack of language access can prevent dangerous situations from being prepared, causing fires and other emergencies.

### **FACTOR 4: THE RESOURCES AVAILABLE TO THE AGENCY AND THE COST OF PROVIDING VARIOUS TYPES OF LANGUAGE SERVICES**

The FDNY uses bilingual staff and the Language Line to speak with our clients in their preferred language.

FDNY employees assist members of the public on the ground floor of the FDNY headquarters. Individuals come to the public section of the building to submit plans and/or paperwork, take exams for Certificates of Fitness, and/or request fire reports.

Further, the Public Certification Unit provides 2 telephone lines to reach the Language Line. FDNY staff have been trained to use the Language Line.

Outside vendors provide professional interpretation and translation services. FDNY has contracted services with Language Line to professionally translate written materials (popular material from FDNY website as well as other useful brochures) into Local Law 30 required languages as well as languages determined popular by affected community. We expect to have materials translated on an ongoing basis and will continue to translate FDNY resources.

Translated materials are proofread for accuracy before becoming a final document.

The Public Certification Unit has greeters that are highly trained to provide customer service to all applicants, including LEP.

FDNY Bureau of Fire Prevention field inspectors were all given smartphones before end of 2016. Field inspectors use these smart phones for the Language Line, as needed. As of February of this year, the Language Line App has been made available on all department devices and training is in the process of being developed on how to install and use.

#### Section 4. Notice of the right to language access services

FDNY makes sure that the public knows that information is available via translation and interpretation. FDNY post translated materials on its website, when applicable as well as video files for public to view as well. Facebook, Instagram and Twitter are also used to make sure videos and PSAs are available to a wide variety of audiences.

FDNY employees distribute materials in different languages during public events. FDNY inspectors continue to deliver important fire prevention and regulation requirements translated in different languages to businesses during site visits and inspections.

Additionally, the location has stationary signs in the following seven languages:

- Spanish
- Italian
- Haitian Creole
- Chinese
- Russian
- Arabic
- Korean

FDNY's Public Certification waiting area has an electronic LCD monitor that plays a slideshow (loop); it's installed to display relevant information in different languages for the applicants coming in and waiting to take an exam.

One of the slides informs the applicants that if they have an English language difficulty; the exam may be read to them by one of the COF employees. Another slide shows that interpretation services are available free of charge, upon request.

Signs that describe the services the FDNY provides are posted on the 1<sup>st</sup> floor. The agency is currently working on developing and obtaining more signage.

**Section 5. Provision of language access services**

The FDNY provides language access services via multiple channels:

**A. Interpretation**

- FDNY Inspectors and employees who greet the public at the Public Certification Unit have access to the Language Line interpretation services.
- FDNY employees can obtain an interpreter by phone to assist LEP customers in their native language. The Language Line currently offers interpreters for over 100 languages.
- FDNY has implemented the use of the Language line app for more expedited services.
- The FDNY provides free interpretation for rule hearings, upon request. The interpretations will be provided by the Language Line. Although the hearing notice is provided in English, it is noted that free interpretation is available. Based on language access request, most of the individuals who represent businesses and building owners who receive the hearing notices speak and read English. The representatives typically understand the notice without interpretation.





## B. Translation

- The FDNY commonly distributed documents that are translated into the Local Law 30 designated languages. The FDNY also provides helpful emergency preparedness information which is translated into ten (10) languages. Further, important forms are also translated into different languages to assist LEP customers. The FDNY is in the process of reviewing and revising forms and documents previously generated by the FDNY to ensure that they meet plain language standard.
- The NYC Fire Code requires that certificate of fitness applicants have a reasonable understanding of the English language and be able to answer satisfactorily such questions as may be asked of such applicant upon his or her examination. While all the exams are given in English, we provide dictionaries and allow applicants to bring their own dictionaries for the Certificate of Fitness exams; and make every reasonable accommodation to LEP customers.
- The FDNY utilizes Language Line to write and proofread the translated pamphlets for small businesses owners. Field inspectors provide the materials with useful information in different languages to small business owners as well as to the public as needed.
- Voter registrations hard copies are available in 5 languages and are presented in the Public Certification Unit in the waiting room, upon request. Voter registrations electronic copies are available online in 11 additional languages.
- This year the FDNY has an education initiative on Lithium-Ion safety which has been translated into the 10 Local Law 30 languages.  
<https://www.nyc.gov/site/fdny/codes/reference/lithium-ion-battery-safety.page>
- The Mayor's office, Charge Safe, Ride Safe: NYC's Electric Micro mobility Action Plan safety tips, have only been translated into Spanish at this time.
- During fire or medical emergencies, FDNY staff have image cards to help customers identify common problems by pointing to a specific picture. See screenshots of the booklet below.
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## C. Digital communication

- FDNY translated documents that are currently available on the agency's website. Priority in translating is given to the documents that are viewed and downloaded most frequently.

## D. Emergency communications

*While NYC Emergency Management and other agencies may take a lead role in large-scale emergency response, many agencies provide specific resources to aid individuals and families in crisis. Agencies must anticipate and set conditions such that emergency communications can be delivered quickly and efficiently to meet the language needs in an equitable manner.*

- In case of broad-scale emergency response, the FDNY will work with NYC Emergency Management on instructions for NYC residents and visitors.
- For extended operations, events that affect multiple areas in the city, federally declared disasters, and notice events, FDNY will participate as needed within the City’s emergency response structure, including working with the interagency Language Access Task Force.
- As needed, FDNY will activate its Continuity of Operations (COOP) plan to ensure continued services for all New Yorkers.

**Section 6. Resource planning**

The agency will address the changing needs regarding language access on as needed basis. The Language Access Committee members will evaluate current issues and develop plans which will solve the problems at hand. The group discussion between committee members will occur during meetings which are expected to occur on as needed basis.

**A. Bi-/multi-lingual staffing**

- The FDNY gathers data on bilingual staff, whether they self-report as bilingual or are certified as bilingual through the selective certification process in order to see how staff may be able to help assist LEP population.
- Multilingual staffing will be tracked on a regular basis by direct supervision and reported to Language Access Coordinator yearly.

**B. Language service vendor contracts**

- FDNY will continue the services with existing vendors.

Vendor name	Procurement method	Purpose of the contract	Language(s) provided by the vendor	Period of contract	Total award amount of contract
Language Line	<ul style="list-style-type: none"> <li>• Micro purchase</li> <li>• Task Order</li> </ul>	<ul style="list-style-type: none"> <li>• Document translation</li> <li>• Telephonic interpretation</li> </ul>	Over 150 including different dialects of each	<ul style="list-style-type: none"> <li>• 7/1/2023-6/30/2024</li> <li>• 6/1/2022-5/31/2025</li> </ul>	<ul style="list-style-type: none"> <li>• \$20,000</li> <li>• \$156,560</li> </ul>

- We will also require additional funds for translating English material into Local Law 30 required languages. Funding amount is not clear as the number of documents that need to be translated are rapidly increasing with constantly evolving and new situations, such as heat waves, lithium-ion batteries, etc .

**C. Partnership with CBOs**

FDNY is often invited to work with CBOs for mobile CPR, Fire Safety education, and other external resources. When constituent base uses a less common language, CBO provides onsite interpretation.

## Section 7. Training

All front-line staff who provide services to customers are trained. FDNY employees speak numerous languages and can communicate with LEPs as needed.

Since 2015, the FDNY Phoenix Society has organized Mandarin classes. These classes, funded by the FDNY Foundation, are open to all active and retired FDNY members. These voluntary weekly classes focusing on conversation are meant to facilitate communications between FDNY members and the public. Firefighters, EMTs and paramedics learn Mandarin through this initiative. We will consider what other programs can be offered going forward to expand knowledge and educate our staff.

Public Certification Unit employees have been trained to write study materials and exams that are administered to the public in plain English language. The material is written in simple sentences that are easy to read and understand.

Supervisors train their front-line staff on how to properly assist LEP customers. In addition, employees are trained on how to use the Language Line services, through the special dual handset or via mobile phones in the field.

Most recently a training module has been developed for the newly deployed Language Line App, that will be sent out to all Bureaus. We are currently working on requiring Learning Management System (LMS) training for the newly implemented Language Line iPhone app.

<b>Training topic</b>	<b>Target staff</b>	<b>Training method &amp; frequency</b>	<b>Trainer</b>
<i>What topic will be covered in the training? Is the training a part of existing trainings (such as new hire orientation)?</i>	<i>Which internal and contracted staff will be trained?</i>	<i>What mode will the training be in? (self-paced virtual, in-person, etc.) How frequent will the training be provided?</i>	<i>Who will conduct the training?</i>
Customer Service and Language Access	Frontline, Inspection, and clerical Staff	LMS, virtual	BFP Training Unit
Language Line	Operations, EMS, Frontline, Inspection, and clerical Staff	LMS, virtual	BFP Training Unit Language Access Coordinator

## Section 8. Continuous improvement planning

### A. Data collection and monitoring

The FDNY tracks the use of all of our language access contracts, including the use of telephonic interpretation, on-site interpretation and written translation by program and location.

Language Line provides reports upon request summarizing the call duration, the language interpreted, as well as other metrics.

### B. Language access complaints

All 311 complaints are routed through the Commissioner's office and are directed to specific units to address each issue.

Further, if any FDNY Language Access issues are reported to 311, an e-mail is sent to Angel Scott, FDNY employee who would forward it to Language Access Committee. There has not been any complaints or requests via 311 for this reporting cycle.

Any issues received are evaluated on case-by-case basis with the Language Access Committee before they are brought up to department heads.

## Section 9. Goals and actions planning

<b>Priority Language Access Need</b>	<b>Root Cause(s)</b>	<b>Language Access Goal</b>
<i>Indicate the priority language access needs determined by your agency that, if resolved, will advance equity and inclusion of individuals with LEP</i>	<i>Identify the root cause(s) or contributing factors that explain the current LA needs.</i>	<i>Based on the priority needs and root causes, develop your agency's LA goals.</i>
Language Line App Training	New app	All Staff trained

<b>Action Steps/ Milestones</b>	<b>Stakeholders</b>	<b>Timeline</b>
<i>Based on each LA goal, identify action steps your agency will take in the next three FYs. Action plans can include new and current initiatives, which address root causes. Utilize bullet points if multiple actions are needed to achieve an LA goal.</i>	<i>Identify internal and/or external stakeholders that the agency will work with for each action steps.</i>	<i>Indicate the timeframe in which each action steps will be implemented.</i>
Language Line App Training	Language Access Coordinator	3-6 months
Training in Learning Management System (LMS)	Language Access Coordinator	6 months- 1 year