

Language Access Implementation Plan



New York City Chief Technology Officer Matthew Fraser
Updated: July 2024

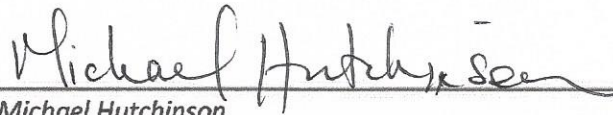
Signatures



10/28/24

Rachel Alba
Deputy EEO Officer, OTI

Date



10/28/24

Michael Hutchinson
Budget & Contracts Manager, NYC 311

Date



10/28/24

Matthew Fraser
Chief Technology Officer, City of New York

Date



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

This Plan includes information about:

I.	Agency Mission and Services	2
II.	Agency Language Access Policy	3
III.	Language Access Needs Assessment	5
IV.	Notice of the Right To Language Access Services	7
V.	Provision of Language Access Services	8
	<i>a. Interpretation services</i>	<i>8</i>
	<i>b. Translation services</i>	<i>9</i>
	<i>c. Digital Communication</i>	<i>10</i>
	<i>d. Emergency communication</i>	<i>10</i>
VI.	Resource planning	11
VII.	Training	12
VIII.	Continuous Improvement Planning	14
XI.	Goals and Action Planning	16

I. Agency Mission and Services

OTI Connects NYC

The Office of Technology and Innovation (OTI) primarily serves city agencies by maintaining the core technology infrastructure and platforms that power many city systems. OTI also helps agencies build the vital programs that are central to their work of delivering services to New Yorkers. Whether it's public safety, human services, or economic development, OTI's goal is always the same: to improve New Yorkers' lives by leveraging technology to connect them to the government services they rely on daily. The 311 Customer Service Center and the NYC.gov platform, the City of New York's official website, are OTI's primary channels to interact with the public.

The 311 Customer Service Center first became operational in March 2003. Its mission is to provide the public with quick, easy access to all New York City government services and information. The 311 Customer Service Center supports over 100 city agencies, offices, and other government entities. It is the primary vehicle used by residents, businesses, and visitors throughout the five boroughs to obtain non-emergency government services and information.

Callers can obtain information from a knowledge base of over 2,000 articles, which provides pertinent details on government services and information. Calls to 311 are answered 24 hours a day, 7 days a week, 365 days a year. Services include providing information, processing service requests for various city agencies, taking complaints from callers about city services, and making referrals to certain city, state, and federal government agencies.

The city agencies for which 311 takes service requests include, but are not limited to: the Department of Buildings, Department of Education, Department of Environmental Protection, Department of Health and Mental Hygiene, Department of Housing Preservation and Development, Department of Parks and Recreation, Department of Sanitation, Department of Transportation, Police Department (Quality of Life), and the Taxi and Limousine Commission.

OTI and 311 work closely to help agencies improve service delivery by allowing them to focus on their core business and manage their workload efficiently. OTI also provides insight into ways to improve through accurate and consistent measurement and analysis

of citywide service delivery. 311 maintains liaisons with city agencies to develop and maintain updated content specific to the agencies' service offerings. This information is shared with callers seeking detailed information about the services provided by those agencies.

OTI also hosts and maintains the NYC.gov platform, providing technical support for approximately 200 separate public websites for city initiatives, agencies, and offices which are responsible for managing their own site content. In 2015, OTI implemented the Google Translate widget across NYC.gov. Google Translate enables all agencies to provide dynamic, real-time translation of web pages into more than 100 languages.

II. Agency Language Access Policy

311

OTI has demonstrated its long-standing commitment to making government information and services more accessible to all New Yorkers through its 311 Customer Service Center and citywide public-facing websites, including the city's official web platform, NYC.gov, and other recently developed web-based applications. OTI is also committed to working closely with elected officials, community partners, and members of the public to improve service delivery for individuals with limited English proficiency (LEP) and to enhance the overall customer experience for all New Yorkers.

311 began providing telephonic interpretation and translation services before Executive Order 120, issued in 2008, and Local Law 30, passed in 2017. All services provided by 311 are available to LEP individuals, regardless of the language spoken. 311 routinely informs customers of the availability of interpretation services with an upfront Interactive Voice Response (IVR) message. Providing non-English callers with the option to speak in their native language or the language they are most comfortable speaking) encourages them to contact 311 for assistance to obtain government services or information.

311 has included service level agreements on the time it takes to connect to an interpreter in their contract with the language services provider. Reducing the time it takes customers to connect to an interpreter is a goal of 311 because it improves the overall customer experience. 311 also piloted and will continue to perform customer satisfaction surveys in languages other than English, to help gauge the experience of its LEP customers.

In 2015, OTI implemented the Google Translation widget across the updated NYC.gov platform. OTI maintains, manages, and supports, the standard template for NYC.gov,

which provides city agencies with a web-based, language translation solution that is hard-coded into the template, prominently displayed, and easy for visitors to use. OTI also provides meaningful language access by overseeing the technical review and implementation of alternate solutions that utilize manual and machine-based translations.

In March 2023, OTI launched the MyCity website with a first phase that included a simplified childcare application. MyCity's second phase, featuring a redesigned Business site, followed in September 2023. MyCity helps New Yorkers easily search, apply for, and track city services and benefits. MyCity can be translated into the 10 designated citywide languages under Local Law 30: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish. OTI will continue developing MyCity with other city agencies and based on feedback from the public.

Language Access Coordinators

The Language Access Coordinator for OTI is Rachel Alba, who serves as the agency's Deputy Equal Employment Opportunity (EEO) Officer. OTI's Language Access Implementation Plan (LAIP) can be found on its website.

OTI manages both the operations and technology for New York City's 311 Customer Service Center, which is our primary means of interacting with the public. Given the central role that 311 plays in providing government information and services to the public, 311 also has its own Language Access Coordinator, Michael Hutchinson, whose title is Contracts and Finance Director. This information is accessible on the OTI and 311 websites.

It is the role of the designated Language Access Coordinator to manage language access services as follows:

- Coordinate over the phone interpretation and document translation services via the approved contract vendors, and proactively manage the contractual relationship for these interpretation and translation services.
- Coordinate effective and timely interpretation and translation service for 311 service requests, complaints, correspondence, or other documents requiring translation.
- Document and report on the translation services requested and provided.
- Oversee the operational relationship with each interpretation and translation vendor.
- Collaborate with the Department of Citywide Administrative Services (DCAS) and

OTI's citywide contracts team on the provision of language access services related issues.

- Monitor vendor compliance with contractual service level agreements.
- Manage all internal document translation requests on behalf of OTI and 311 with the vendor.
- Support the internal and external training, quality assurance, and operations teams at 311 and the vendor for interpreter and translator-related items.
- Routinely review escalated calls related to language line usage for quality assurance purposes.
- Refer service problems through the vendor's Voice of the Customer (VOC) process.
- Interact with OTI's telecommunications and IT personnel regarding technical issues encountered with Language Line and escalate to the vendor, if necessary, for resolution.

The Language Access Coordinators continue to monitor, maintain, and make recommendations to enhance, whenever possible, access to language services.

III. Language Access Needs Assessment

Factor 1: Demographic analysis

The City of New York has a diverse population of over 8.3 million people. Executive Order 120 and Local Law 30 require agencies providing direct and emergency public services to provide services in 10 languages. These languages were identified by the Mayor's Office of Immigrant Affairs (MOIA) based on an assessment of the U.S. Census data from the Department of Education. The languages are Spanish, Russian, Mandarin, Cantonese, Bengali, Haitian Creole, Korean, Arabic, French, Urdu, and Polish. 311 has provided telephonic and translation services since 2003, as required, in over 175 languages, including the ten mandated languages. 311 routinely monitors the frequency of use of these languages.

Factor 2: The frequency of contact with Limited English Proficiency individuals

In Fiscal Year 2023, 311 received 17,857,232 calls, of which 609,255 required interpretation services. Language Line was utilized on 321,235 of those calls in 86 different languages, including Spanish, which accounted for just over 246,175 calls. The top 10 languages/dialects requiring interpretation assistance by the public were Spanish, Mandarin, Russian, Cantonese, Haitian Creole, Korean, Arabic, Bengali, French, and Polish. These languages represented just over 99% of the telephonic interpretation service minutes provided by Language Line in FY 2023. Additionally, 311 employs Spanish-speaking Call Center Representatives who handled another 288,020 calls in Spanish, without the need for a Language Line interpreter.

311 obtains information from other agencies that assist in determining specific language requirements for targeted outreach programs. Over 96% of LEP callers to 311 request interpretation services in Spanish, Mandarin, Russian, and Cantonese. The remaining 4% request interpretation in other languages. Regardless of language, all LEP individuals are eligible for telephonic interpretation services. During a call with an LEP individual where interpretation services are engaged, and the call is an emergency that requires a transfer to 911, 311 agents will immediately conference the caller along with the interpreter to 911 and remain on the call until the 911 operator authorizes 311 to disengage.

Language Line call volumes, broken down by the frequency of each language requested, are reviewed monthly by 311 and shared with MOIA quarterly to assess changes in the LEP population.

Factor 3: Nature and importance of services

The 311 Customer Service Center provides callers with access to interpreters in the languages they request. Many callers require interpretation services to assist them in obtaining access to information that is provided by various agencies, including the Department of Housing Preservation and Development, the Department of Transportation, the Department of Social Services' Human Resources Administration, etc. With an interpreter, callers can obtain the information required to make informed decisions regarding their eligibility or how to access the services offered by many city agencies.

Over the last decade, New Yorkers have increasingly moved online to access information about important city services. As traffic has grown, so has the need to meet the public where they are, responsive to their mobile devices, and in the languages they speak. The NYC.gov platform is home to the vast majority of city agencies and program websites, and it plays a vital role in connecting New Yorkers with government services. During the pandemic, online access became essential due to the difficulty of receiving services in

person. OTI provided agencies with new and innovative solutions to connect New Yorkers with vital services, such as GetFood, the Vaccine Finder, and the VAX4NYC website and call center.

Factor 4: Resources available for language assistance

OTI and 311 provide various means for LEP New Yorkers to obtain access to City services and information.

- Messages in languages other than English have been included in 311 upfront IVR messaging solution for all callers.
- 311 utilizes the skills of its bilingual (Spanish) staff to support callers requiring telephonic interpretation services.
- 311 informs the public of language assistance services on its social media and text messaging channels and provides language assistance on these channels.
- Posters are displayed in various languages to emphasize to staff and visitors 311's ability to communicate with the public in multiple languages.
- 311 conducts online surveys available in multiple languages other than English to gauge LEP customer satisfaction. 311 uses the surveys to better understand customer needs and their perception of the service offerings and this information will be used to improve service delivery where possible. Future online surveys in multiple languages are being considered.
- OTI implemented the Google Translate widget across the NYC.gov platform to help agencies provide for the dynamic, real-time translation of their webpages into more than 100 languages.
- OTI also oversees the technical review and implementation of alternate solutions that utilize manual and machine-based translations on specific applications, as needed.

OTI and 311 utilize the citywide Primary Agreement for telephonic language interpretation and translation services. In FY 2023, the cost incurred by 311 and OTI to provide these services was approximately \$3,329,216. This included \$1,746,571 for telephonic interpretation and document translation, and approximately \$1,582,645 to support other initiatives.

IV. Notice of the Right To Language Access Services

311 informs the public of language assistance services through its IVR platform, 311

Online on the NYC.gov platform, social media, and text messaging channels. Translation of cultural signs and photographs are displayed inside the 311 Customer Service Center in various languages to emphasize to staff and visitors (local and international invited delegations) our ability to communicate with the public in multiple languages. OTI and 311 do not customarily distribute written materials to members of the public.

Notification of free interpretation signage

Neither OTI nor 311 have walk-in centers for the public. However, translated signs in the 10 designated languages, as required by Local Law 30, are displayed in 311's contact center to emphasize to staff and visitors our ability to communicate with the public in multiple languages.

V. Provision of Language Access Services

a. Interpretation services

311's business model provides around-the-clock interpretation services for all callers – 24 hours a day, 7 days a week, 365 days a year – and has done so since 2003. This service is currently available in over 175 languages (including the 10 languages covered by Local Law 30) via Language Line.

311 is mandated to answer 80% of all calls within 30 seconds and must provide access to health and human Services via its 211-dialing protocol in over 175 languages. It is the goal of 311 to provide telephonic interpretation in Spanish, Cantonese, Mandarin, and Russian, the four most-commonly-requested languages, within 30 seconds. Service level requirements are in place for the vendor that provides telephonic interpretation.

In 2008, a multi-lingual IVR system interface was first introduced and was subsequently upgraded in 2019 to provide enhanced non-English functionality. Callers can now communicate with the Natural Language Understanding (NLU) interactive speech application using direct dialogue in Spanish. NLU allows Spanish-speaking customers to ask their questions and receive answers in a natural language mode. The IVR service was updated in FY 2024 to include five additional languages. It provides callers who speak Spanish, Mandarin, Russian, Cantonese, Korean, Haitian Creole, Arabic, French, Urdu, Polish, and Bengali with the option of listening to current 311 pre-recorded announcements such as “alternate side of the street parking” and other important information in their primary language. This shortens the wait time for callers seeking this information and eliminates the need for an agent or an interpreter to answer the call.

During FY 2023, approximately 944,000 callers selected the IVR option to indicate their desire to be serviced in a language of their choice and 311 completed 990,359 calls requiring an interpreter in 86 different languages. After listening to the recording, callers have the option of requesting assistance in any of the other available languages, including those covered by Local Law 30. 311 will monitor feedback received from the public via its ongoing customer satisfaction surveys as a means of improving language access via the IVR and other channels.

In accordance with Emergency Executive Order 224 of 2022, OTI has furnished critical technology infrastructure and mobile device access to Humanitarian Emergency Response and Relief Centers (HERRC) and other migrant sites citywide, which are managed and operated by the New York City Health and Hospitals Corporation. OTI created technology network access at locations that lack them, working with vendors to procure equipment needed to ensure on-site security, or installing phones so migrants can make international calls to family and seek employment. OTI's Applications and Infrastructure Management teams have also been part of the effort in various ways, including deploying iPads at the sites. Language Line's translation services are supported by a tablet-based application installed on devices issued to the HERRC managing agency.

b. Translation services

Neither OTI nor 311 routinely require document translation services to fulfill its mission, as neither regularly distributes documents to the public or the media, or place documents on New York City's Language Gateway. There are no essential documents that require translation at OTI or 311. However, OTI and 311 do utilize the citywide Primary Agreement with Language Line to provide these services when required to improve service delivery. All translation requirements (i.e., voice recordings or document translations) are determined on a case-by-case basis and are managed by the Language Access Coordinator. In most cases, where possible, in-house staff will also review translations provided by Language Line for accuracy.

In 2020, 311 piloted its first online customer satisfaction survey in multiple languages, which were Arabic, Bengali, Cantonese, Mandarin, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu. 311 continues to use surveys in language as a means of evaluating services provided to LEP individuals and improving service delivery where necessary.

311 embarked on a plain language initiative in 2011. All content in its Customer

Relationship Management (CRM) system used by Call Center Representatives now appears in simple, clear, and concise language, free from extraneous words or technical jargon, for ease of understanding by members of the public.

c. Digital Communication

311 utilizes a variety of channels to communicate with New Yorkers. On its primary social media channels, which are Twitter and Facebook, 311 communicates in English and Spanish. 311Online, which is accessible via the NYC.gov website, offers the ability to translate all 311 online content into over 100 languages. Additionally, 311 implemented a new channel allowing New Yorkers to send text messages to 311692 in both English and Spanish, to access services. OTI plans to grow this service in additional languages as resources permit.

d. Emergency communication

311 provides telephonic interpretation and translation services during day-to-day operations, as well as during emergencies. Customers contacting 311 are always advised of the availability of language assistance services. Additionally, Call Center Representatives are trained how to interact with LEP individuals to provide language accessibility for all callers or engage Language Line for assistance.

In case of emergency, and as required by Local Law 13, 311 has a contingency plan that includes redundancy provided by an outsourced vendor. This allows for continuity of call taking services in the event of an emergency to ensure uninterrupted language accessibility. 311 maintains its ability to continue operations despite a natural disaster or other emergency as part of its Continuity of Operations Plan (COOP), as was demonstrated during the COVID-19 pandemic.

Language Line's translation services are available as part of our emergency management portfolio and can be leveraged during an emergency by city stakeholders during that response. Additionally, Language Line's service level agreement for document translation requires accessibility to rush translation requests in the event of an emergency.

911 services

OTI's Public Safety and Emergency Management Division manages NYC's critical life-safety technology and infrastructure, including 911 call centers, modernized data centers, and 40 radio communication facilities. NYC 911 utilizes Language Line to provide

translation services that can be utilized by NYPD call takers for foreign language translation. The NYPD also staffs full-time Spanish language call takers at Public Safety Answering Center (PSAC) I and II. These same services as described above will be available with the current implementation of Next Gen 911.

VI. Resource planning

a. Bi / multi-lingual Staff

OTI and 311 use the Volunteer Language Bank to leverage city employees who are bilingual in many languages for proofreading documents that have been translated by vendors. New York City personnel are sometimes able to make alternate translation recommendations, suggesting foreign language colloquialisms that are more widely understood by 311 callers. Internal staff are also used to evaluate IVR recordings provided by the vendor using professional voice interpreters.

b. Language Service Vendor Contract

DCAS hosts the citywide Primary Agreement with all language service providers.

In 2018, the Department of Citywide Administrative Services (DCAS) renewed their contract with Language Line Solutions (Language Line) for telephone interpretation and language translation services. OTI and 311 currently use Language Line for both of these services. The DCAS contract was designed to permit all City agencies to establish a Task Order under their Primary Agreement. This eliminates the need for other agencies to undertake a Request for Proposal (RFP) process for language interpretation and translation services, and agencies benefit from the economies of scale available under a citywide Primary Agreement.

OTI/311's current vendor for interpretation and translation services, Language Line, is considered an expert in the industry. Language Services Associates, a secondary citywide vendor, provides redundant interpretation services in the event of an emergency.

OTI, 311, and the virtual contact center vendor (King TeleServices) continue to hire personnel who are bilingual in Spanish to ensure language accessibility in our most requested language.

As funding permits, 311's goal is to have all bilingual employees and volunteers certified through the Language Line proficiency testing. A contract is in place to provide these certification services.

c. Partnership with Community Based Organizations

OTI and 311 are committed to working closely with elected officials, community partners, and members of the public to improve service delivery for LEP individuals and to enhance the overall customer experience for all New Yorkers. Feedback pertaining to language access is obtained from Community Boards, Borough President's Offices and MOIA.

Connected Communities

OTI funds and administers NYC Connected Communities, which provides digital and internet access in historically under-connected areas across the city and reaches thousands of New Yorkers every year. In partnership with NYC Parks, NYC Aging, NYC Housing Authority (NYCHA), and the city's three library systems, Connected Communities offers critical public access to computers and digital devices, mobile hotspots, broadband, and over 24,000 hours annually of high-quality digital literacy programming. Outreach and curriculum for these programs are tailored to populations most impacted by the digital divide, including older adults, people impacted by the justice system, people with disabilities, English language learners, and low-income people.

Connected Communities locations typically have bilingual staff and materials on site in centers located in neighborhoods where a significant percentage of residents speak a primary language other than English; staff at all locations are well-versed in using language line, which provides over-the-phone interpretation in over 200 languages.

Public computer center locator

The City of New York operates over 500 public computer centers through NYC Parks, Department of Youth and Community Development community centers, NYC Aging Older Adult Centers, NYCHA vans, LinkNYC Gigabit Centers, and the tri-library system (New York Public Library (NYPL), Queens Public Library (QPL), Brooklyn Public Library (BPL)). Approximately 100 of these computer centers are supported by OTI's NYC Connected Communities program. These neighborhood-based centers are free and open to the public, and provide a range of resources, from computers to digital media production kits, to digital skills training. OTI recently conducted an inventory of these centers created a [new website and map](#) to make them easier to find for the general public. Interpretation and translation services at these locations are provided by the managing organization.

VII. Training

All frontline 311 staff are trained on providing language services as new hires. There is also ongoing coaching and monitoring of calls to reinforce the need for, and importance of, language accessibility for callers.

Call Center Representatives (CCRs) receive four weeks of classroom training with an intense

emphasis on customer service skills and techniques.

As part of the training, 311 CCRs are taught how to interface with LEP individuals, as follows:

- a. CCRs are instructed on how to handle a call when they are unable to readily identify the caller's language.
- b. CCRs who are unable to determine the language required by a caller will connect with Language Line and request to speak with someone who is skilled in language identification.
- c. CCRs utilize Computer Telephony Integration (CTI), which allows them to connect almost instantly to Language Line and conference an interpreter into the call.
- d. CCRs are trained to speak to the caller through the interpreter so that the caller receives the same service that an English-speaking caller would receive.
- e. During new hire training, 311 trainers review the prescribed tips for handling Language Line calls.

Internal bilingual Spanish-speaking staff at King Teleservices (a virtual offsite contact center utilized to support 311 during high call volume) must pass a language assessment test approved by the City to be qualified to handle 311's Spanish calls. 311's vendors, Language Line and Language Services Associates, employ professional interpreters with years of experience and highly qualified testers to administer an Interpreter Skills Assessment Test. Interpreters are assessed on their ability to speak clearly, remain neutral, maintain accuracy in both languages, process information quickly and concisely, be sensitive to cultural differences, be professional and courteous, use appropriate industry terminology, and understand industry practices and procedures. Newly hired interpreters receive a three-week orientation program and ongoing training and coaching.

OTI, partnering with the Mayor's Office of People with Disabilities (MOPD), regularly offers digital accessibility trainings to city agency communications and web staffers. The trainings are mandatory before new sites are launched, and they have recently been conducted to help agencies audit their own web products. During the trainings, attendees are made aware of the advantages and limitations of the Google Translate widget. Agencies are encouraged to use plain language whenever possible and are informed of potential translation services available through MOIA. In the past year (FY 2023), OTI and MOPD have offered 30 digital accessibility training sessions.

OTI is an equal opportunity employer that is committed to upholding federal, state, and

city EEO laws, as well as citywide EEO policies and procedures. During new hire training, as part of the customer service component, 311 CCRs are trained to be sensitive to the caller's needs and on how to professionally interact with LEP individuals. OTI and 311 personnel also receive an EEO orientation class that addresses cultural diversity in the workplace when communicating with external customers. Posters written in a variety of languages are positioned throughout the 311 Call Center to remind personnel about the need for sensitivity when serving the diverse population of 311 callers.

VIII. Continuous Improvement Planning

Data Collection and Monitoring

All calls to 311 are recorded and all metrics related to language assistance services are readily accessible at 311 or via the vendor's portal. 311 maintains data pertaining to vendor services provided, 311 IVR metrics, and the 311 staff interpretation services that are provided to the public.

The 311 Quality Assurance (QA) team monitors recorded calls daily for all shifts to ensure compliance with Executive Order 120, Local Law 30, and OTI/311 policy. Bilingual QA evaluators listen to Spanish calls and provide coaching and development to Call Center Representatives (CCRs). 311 supervisory staff also evaluate and coach Spanish calls. The QA team also evaluates calls handled in other languages to ensure that the English-speaking 311 call taker and the interpreter are working together to provide the caller with quality service. When a caller raises a quality concern, the 311 QA team, the vendor, and the interpreter are notified for corrective action. The same internal process applies to Spanish-speaking CCRs at 311.

Similarly, Language Line has a QA team that monitors live calls without the knowledge of the interpreter. A senior language specialist provides coaching, feedback, and identifies training needs and developmental opportunities.

Language Line has a formalized process known as the Voice of the Customer (VOC), which ensures that coaching feedback is provided in a timely manner regarding concerns expressed by the client and of any action taken. The vendor uses the VOC process to target the key areas that may require a developmental program for interpreters. 311 managers or supervisors may refer problematic Language Line calls to the 311 Language Access Coordinator for review and escalation to the vendor.

Language Line provides monthly and quarterly reports via their portal, which includes both the number and duration of individual calls and for all calls combined. 311 also maintains metrics on the volume of calls handled by our bilingual employees and

calls handled in languages other than English by our IVR.

To ensure compliance with Executive Order 120 and Local Law 30, 311:

- Provides language access in over 175 languages and dialects.
- Monitors call volumes and consumer needs daily and monthly.
- Records and retains in accordance with 311's Privacy Policy, all calls, including those utilizing an interpreter.
- Evaluates calls handled in other languages to measure the level of customer service. This is a large responsibility of our QA team.
- Reviews Language Line call volumes by language on a monthly basis, in addition to quarterly reviews by MOIA, to assess changes in the LEP population.
- Conducts routine reviews to determine the need to hire additional bilingual interpreters for other languages besides Spanish.
- Utilizes the vendor's VOC process to assess the performance of the vendor's interpreters.
- Ensures that all vendors engaged to provide language services have contractually agreed upon service level agreements.
- Obtains feedback from Community Boards, Borough President's Offices and MOIA.
- Responds to caller feedback and complaints regarding language access issues, which may result in process improvements or service enhancements.
- Updates the Language Access Plan as required.

Language access complaints

311 is available for the public to make complaints and to provide information and referral services to other city, state and federal agencies while completing service requests for members of the public. It serves as a conduit to receive complaints about all city agencies.

311 can receive complaints, questions, and requests pertaining to language access from the public via all its channels. A customer may choose to submit these through any of 311's online channels (e.g., NYC.gov, social media, mobile application) or may call 311 directly. 311 forwards all language access complaints and requests pertaining to 311 to MOIA's

Language Access Complaint mailbox and to the Language Access Coordinator.

All complaints and requests from customers are tracked via 311's CRM system and monitored by the Language Access Coordinator. It is the responsibility of the Language Access Coordinators to assure the timely resolution of any complaints or requests from customers regarding OTI or 311 specifically. 311 reports the number of complaints received in its Language Access Plan annually and reports the number of language access requests as well.

XI. Goals and Action Planning

Language Access Implementation Plan and Progress on Goals

311

311 is currently mandated to answer 80% of all calls within 30 seconds. It is the goal of 311 to ensure that the average time to have a telephonic interpreter in the four most-commonly-requested languages of Spanish, Cantonese, Mandarin, and Russian, is also 30 seconds or less. Additionally, 311 provides access to health and human services in over 175 languages via its 211-dialing protocol. In April 2008, 311 introduced a multi-lingual IVR system interface, which was upgraded in 2018 to enhance non-English functionality. This enhancement included a direct dialogue feature to the Spanish call flow that enables customers to speak in Spanish via the IVR. All callers that select the language options via the IVR are informed in their language that a representative will bring an interpreter on the line for assistance. During FY 2023, approximately 944,000 callers selected the option offered by the IVR indicating their interest in being serviced in the language of their choice.

In 2019, additional functionality was integrated to further assist customers requiring interpretation services. CCRs are now informed of the customers' preferred language via a screen prompt as soon as the call is answered.

This improves the customer experience as an interpreter can be quickly engaged in the preferred language without the need for language triage. This service provides customers who speak Spanish, Mandarin, Russian, Cantonese, Korean, Haitian Creole, Korean, Arabic, French, Urdu, Polish and Bengali the option of listening to current 311 pre-recorded announcements such as "alternate side of the street parking" and other important information in their native language. This both shortens the wait time for customers seeking this information and eliminates the need for an agent or an interpreter

to answer the call. After the recording, customers still have the option of requesting assistance in any of the over 175 other languages available via Language Line.

In 2020, 311 piloted its first online customer satisfaction survey in a language other than English. This survey was available in all 10 languages identified under Local Law 30. During FY 2023, 311 completed nine survey campaigns in all designated citywide languages. Additional surveys are ongoing (IVR, Contact Center, Text Messaging, social media and Portal) to assess LEP customer satisfaction with the various services provided by 311.

During the COVID-19 pandemic, 311 added surge-call takers through its contracted vendors. 311 directed the vendors to prioritize staffing bi-lingual (English and Spanish) agents across all shifts. 311 also directed vendors to utilize Language Line for non-English language calls as necessary.

Additional work related to future goals for 311 are outlined in the tables below. This includes work for ongoing required surveys mandated by the City Council, 311 IVR tuning for improved language accessibility; enhanced 311 portal access “how to” pages in language, and the development of an AI solution with language accessibility for 311.

NYC.gov

NYC.gov, the city's official website, is the virtual home of almost all NYC agencies, and serves over 300,000 visitors a day, delivering important government information and critical services to New Yorkers. During the pandemic, when many of the city's physical offices were closed to the public, NYC.gov assumed an even greater role. New sites and pages were quickly rolled out, already hard-coded to be digitally accessible, mobile-responsive, secure, and language-translatable. It helped New Yorkers find food assistance, employment assistance, personal protective equipment, testing sites, and updates about the status of schools, businesses, and houses of worship. NYC.gov played a vital role in helping to keep all New Yorkers informed, safe, and connected. NYC.gov utilizes the Google Translate widget that allows any content to be translated into more than 100 different languages.

The 311 Customer Service Center provides meaningful language access in over 175 languages and has been language accessible since early 2003. Existing contracts with our vendors currently address the full scope of the services required to maintain compliance with Local Law 30. Additionally, OTI's NYC.gov platform has included the Google Translation widget since 2015, making webpages accessible in over 100 languages. Neither OTI nor 311 issue licenses or permits to their customers and, unlike some

agencies, do not have walk-in centers for the public.

OTI and 311 currently meet all requirements of Executive Order 120, Local Law 30, Local Law 15 and Local Law 13. 311 continues to maintain a plain language standard required by Local Law 15, which has been implemented for several years. OTI and 311 will continue to review policies, procedures, and services to ensure compliance. OTI and 311 will utilize feedback received from the ongoing customer satisfaction surveys to improve services to the LEP population.

Priority Language Access Need	Root Cause (s)	Language Access Goal
1. Deploy additional customer satisfaction surveys in additional languages	Determine possible gaps in services	Complete surveys annually across various communication channels
2. Deploy Additional languages to IVR recordings	Enhance IVR capability in language	Enable communication in language at first contact with 311
3. Create enhanced Portal Access Pages	Improve the customer’s experience in language on the 311 Portal	Increase the use of the 311 Portal via Language Accessibility
4. Incorporate language accessibility into an AI solution for 311	Conversational AI solution to enhance customer experience	Make AI accessible in language at 311

Action Steps/Milestones	Stakeholders	Timeline
1. Enable survey deployment at regular intervals	311 Customer Management Team	Several times during the year
2. Redesign the IVR channel to accommodate additional languages	311 Business Relations Team	Ongoing IVR tuning as required to address the needs of customers
3. Provide “how to” instructions in language to 311 portal visitors	311 Customer Management team	Ongoing project work

4. Build an AI solution for voice and chat channels after completing AI pilot	OTI, 311 Project Team	Phased implementation for voice and chat AI solution based on pilot program and funding approval
---	-----------------------	--