



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: New York City Department of Probation

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Language Access Coordinator Title: Equal Employment Opportunity (EEO)
Director

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This Plan includes information about:

1	Agency Mission and Services	The Department of Probation (DOP) helps build stronger and safer communities by working with and supervising people on probation. By fostering positive change in their decision-making and behavior through research-based practices, DOP helps to expand opportunities for them to move out of the criminal and juvenile justice systems through meaningful education, employment, health, and behavioral health services, family engagement and civic participation. DOP also supplies information and recommendations to the courts to help inform sentencing and disposition decisions.
2	Agency Language Access Policy	The Department of Probation (DOP) is required by law to conduct Pre-Sentence/Dispositional Investigations and to supervise individuals sentenced to probation by the courts. Fundamental to the preparation of thorough reports and the successful supervision of individuals sentenced to probation, is the ability to communicate clearly and effectively.
3	Language Access Needs Assessment	How the agency assesses the language access needs of the people it serves
4	Notice of the Right to Language Access Services	How the agency notifies the public about their right to language access services
5	Provision of Language Services	What language services the agency provides
6	Resource Planning	How the agency ensures that it has the internal and external resources to provide language services
7	Training	How the agency trains the staff to provide language services
8	Continuous Improvement Planning	How the agency ensures ongoing improvement of language access
9	Goals and Action Planning	How the agency will put the plan into action

Signatures

Christelle Onwu

Christelle N. Onwu - Language Access Coordinator

6/27/2024

Juanita N. Holmes

Commissioner Juanita Holmes

6/27/2024



Section 1. Agency Mission and Services

WHAT WE DO

The Department of Probation (DOP) helps build stronger and safer communities by working with and supervising people on probation. By fostering positive change in their decision-making and behavior through research-based practices, DOP helps to expand opportunities for them to move out of the criminal and juvenile justice systems through meaningful education, employment, health, and behavioral health services, family engagement and civic participation. DOP also supplies information and recommendations to the courts to help inform sentencing and disposition decisions. In Family Court, DOP provides reports in family offenses, custody, child support, visitation, adoption, guardianship cases, and juvenile delinquency matters. In total, DOP provides pretrial intake, diversion, interstate services; investigations; and supervision. DOP operates the Neighborhood Opportunity Network (NeON) in seven neighborhoods (Brownsville, Bedford-Stuyvesant, East New York, Harlem, Jamaica, North Staten Island, and the South Bronx) where a high concentration of people on probation resides. These locations provide a range of opportunities for people on probation and other neighborhood residents. Through the NeONs, DOP reaches thousands of New Yorkers by providing arts programming, High School Equivalency classes, free groceries, access to health insurance enrollment services, and more. We have a total of (16,285) Probation Clients.

FOCUS ON EQUITY

Probation is the largest and most robust community corrections alternative to detention, jail, and incarceration in New York City. DOP, as one of the largest probation agencies in the nation, is committed to ensuring that the people under its supervision—who are disproportionately people of color—have access to the opportunities and services they need in order not just to avoid jail or prison, but to thrive. DOP brings resources into the City's neighborhoods which are disproportionately impacted by the justice system and where large numbers of people on probation reside. DOP's nationally recognized Neighborhood Opportunity Network (NeON) supports equity in seven such communities by partnering with neighborhood residents and community-based organizations to develop ground-up solutions, while also providing people on probation with reporting sites and resources within walking distance of their homes. Recognized with the Excellence in Crime Prevention Award from the American Probation and Parole Association, the

NeON model is premised on the value of authentic community engagement. DOP is committed to minimizing the adverse collateral consequences of being involved in the criminal and juvenile justice systems which fall heavily on people and communities of color. This commitment is demonstrated through the diverse array of resources and programming made available in these communities. Most NeON programs, including NeON Nutrition Kitchens, NeON Arts, and NeON Sports, are open to all residents, fostering connectivity between neighbors and destigmatizing people on probation. An independent evaluation of the ground-breaking Arches Transformative Mentoring program, serving 16–24-year-olds on probation who live in NeON neighborhoods, found a more than two-thirds reduction in felony reconvictions among participants. The program was named a finalist in the Harvard Kennedy School’s Innovations in American Government Awards. Through accountability measures and service practices grounded in research, such as mentoring and training in life skills, as well as partnerships with community-based organizations and other stakeholders, DOP fosters personal change, increases opportunities to thrive, and strengthens communities, thereby building a more equitable and safer city.

Section 2. Agency Language Access Policy

The Department of Probation (DOP) is required by law to conduct Pre-Sentence/Dispositional Investigations and to supervise individuals sentenced to probation by the courts. Fundamental to the preparation of thorough reports and the successful supervision of individuals sentenced to probation, is the ability to communicate clearly and effectively. Through the utilization of qualified language interpreters, DOP employees can communicate clearly and effectively with LEP clients in their primary language. This is especially critical during discussions that could impact an individual's liberty and/or compromise public safety.

“I SPEAK” posters, which can be found on the agency’s intranet under Agency Resources / Language Access Services, MUST be highly visible in all departmental client waiting areas as a tool for LEP clients to point to their primary language and to indicate that interpretation assistance is needed. Assistant Commissioners, Branch Chiefs and Family Court Directors are responsible for ensuring that this tool is always available and is displayed in highly visible areas, at all reception desks and entry points.

The Language Access Plan outlines the steps agencies are taking to “ensure that the agency’s workplace, services, programs, detention centers and activities have Telephonic Interpretation Services to ensure effective communication between DOP personnel and clients, coupled with, other members of the public with limited English-Speaking Capabilities. By improving digital, programmatic access, and providing effective communications for persons that speak no or limited English. DOP’s proposed plan is posted and now available for public comment online.

Section 3. Language Access Needs Assessment

The Department is required by law to conduct Pre-Sentence/Dispositional Investigations and to supervise individuals sentenced to probation by the court. For our agency's mission to be realized it is essential that our officers communicate clearly and effectively with the clients they supervise. This is critically important as most discussions with our clients address issues that could impact one's freedom. It is DOP's goal to ensure that a client's primary language is never an obstacle for them to achieve a successful life outside the criminal justice system. DOP is fully committed to providing all clients with clear communication, in their primary language, through contracted interpreter services. All language access services are provided to our clients free of charge. With our younger population, Probation Officers may need to communicate with the parents of our clients, who may not speak English. Language access services are provided during these interactions as well. It is DOP's policy to always provide all LEP clients with telephonic or in person language access services from contracted certified interpreters. During field visits, Probation Officers are equipped with cell phones for the provision of telephonic language access services to clients during home/field visits. Should this not be an option due to poor cell phone reception, a Probation Officer, family member, or friend who speaks the primary language of the client may assist with communication during the field visit. Following this visit and during the very next office visit, the conversation that was held during the field visit is verified through a qualified interpreter.

When a new client arrives at one of the Probation Intake Office in the 5 boroughs, the assigned Intake Probation Officer interviews the new client and uses an I SPEAK card to determine the primary language of the Probation Client. The Assigned Officer then enters the preferred language in the agency's Electronic Case Management System. This electronic record follows the Probation Client each time Officers engage with said Client.

- Once Probation Officers identify that we have a limited to no English-speaking Probation Client, then the officer makes the request on the Intranet for either in person or telephonic services to be performed and selects the corresponding language.
- The application is filled out and sent to our Centralized Helpdesk Team with IT. The application is forwarded to the Language Access Coordinator (LAC) for vendor services and subsequent data collection herein.
- From Accurate Languages (which is our current interpreter vendor), we receive the Interpreter's name for the correct language coupled with their Interpreter ID #.
- Date and time of location and exchanging telephone numbers to streamline the process.
- All the identified is ideally accomplished two weeks in advance. This decreases the likelihood of any complaints or mishaps.
- For individuals viewing the internet from our DOP Website, they can access via the different languages and language access via DOP's Languages Portal.
- LEP Population Assessment U.S. Department of Justice "Four Factor Analysis"

Factor 1

DOP serves a defined population of individuals sentenced by a judge to serve court ordered supervision by Probation Officers. DOP captures the primary language of each client in our Electronic Case Management System. Currently, in accordance with DOP's MMR 3,802 of DOP's clients speak with limited English proficiency. This is 44% of our total client population compared to the approximately 18% of New York City residents (1.6 million adults) who do not speak English proficiently. The top 10 languages spoken by DOP's LEP clients in 2024 were Spanish, Mandarin, Arabic, Russian, Haitian Creole, Wolof, French, Bengali, Cantonese, and Urdu.¹ The primary languages of DOP's LEP individuals differ slightly from the top 10 languages under Local Law 30: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French and Polish.

Factor 2

Through DOP's Electronic Case Management System, the NYC Department of Probation maintains data on the frequency in which each client meets with their assigned Probation Officer as well as the services provided to the client. The frequency of the contact is determined by the level of supervision deemed necessary to ensure the client's success in reaching targeted goals.

The goal of Probation Supervision is to reduce recidivism through a balance between risk management and risk reduction. Probation Supervision is the foundation of this balance as Probation Officers use accountability measures and support to generate behavioral change.

For clients with the lowest risk of recidivism, the minimum required frequency of contact is one contact per month. For clients with high risk of recidivism, the minimum required frequency of contact with their assigned Probation Officer is one in-person contact per week, six collateral contacts per quarter, and one positive home contact per month. For clients with medium risk, the minimum required frequency of contact is two Probation Client contacts and two collateral contacts per month.

Factor 3

DOP provides critical services to clients sentenced to Probation by the courts. DOP ensures that its clients are supervised according to their risk level and that they receive the full support and services needed to abide by the law and to become an asset to their communities. Language Access Services are critical to the NYC Department of Probation Language Access Plan 2024 success of our LEP clients. A lack of clear communication between a Probation Officer and a client could result in a failure to meet critical milestones that may lead to the client losing their freedom. Therefore, DOP staff are trained and reminded annually, via a memorandum from the Commissioner, that all staff is accountable for ensuring that a client's primary language is never an obstacle to a successful life outside the criminal justice system. DOP is fully committed to providing all clients with clear communication through contracted Language Access Services which are provided free of charge.

¹ As of 31st 2024 these are the most used languages on our Language Line Services, Inc., log

Factor 4

DOP's Electronic Case Management System captures the language of every client so every staff who contacts the client knows when there is a need for language access services. DOP uses the data captured through the Case Management System to determine the languages spoken by clients in each borough office. Hence, DOP installed television ads and flyers in each DOP location to capitalize on our targeted audience. The ads, flyers and recruitment of potential clients and Probation staff can be targeted to the languages most spoken by the clients in each individual waiting room. DOP has also used data on the primary languages of our clients to assign Probation Officers based on their ability to speak the language most spoken by our clients in a particular office. DOP also reviews invoices from language access services to ensure that appropriate funding is available to meet the ongoing needs of its LEP clients. In 2023, DOP spent \$61,000 on Language Line Telephonic Services, in-person interpretation and sign language services. In 2024, approximately \$129.00 was spent on document translation.

This reflects DOP's commitment to equity in the provision of supervision and services, so all clients, despite their primary language, are afforded the same opportunity to lead successful lives outside the criminal justice system. DOP works to close the gaps in the provision of language access through all the above plus implementation of customer service surveys and prompt response to any complaints related to the provision of language access services.

Based on the above analysis, the plan outlines the language needs of the agency and assesses whether some, or all, of its direct public services should be provided in a language or languages supplemental to the designated citywide languages.

Section 4. Notice of the Right to Language Access Services

I SPEAK/Language Identification posters and cards are placed throughout all client waiting areas and in the offices of Probation Officers who meet with clients. These posters and cards are also available on the agency's intranet and can be shown to clients by the assigned Probation Officer's computer monitor. I SPEAK/Language Identification cards are also placed in visible areas at agency events for clients and the community. Most client waiting areas display a "Welcome Sign" in the many languages spoken by our clients.

Should a client's primary language not be available through the current telephonic or in person interpretation contracted services, the LAC contacts the agency's ACCO to secure a contracted vendor that does have an available interpreter who can assist the LEP client in their primary language. Languages beyond the top 10 are available to DOP's clients and members of the public.

- The Customer Service survey conducted and reviewed to correct any weakness in the agency's provision of Language Access Services.
- DOP sends agency wide Language Access Communication via our agency's intranet system.
- Text messages are sent to Probation Clients via our Electronic Case management System.
- The Emergency Management Text and Audio in the top ten languages are sent to address Acts of God situations such as Tropical Storms of recent, 2024's Hurricane in New York City.

You will now see “Please contact your Probation Officer for Language Access Assistance” with each text message.

- DOP continues to work with DOITT to update DOT’s Website to the most efficient methods for providing Language Access Services to our clients via the agency website. Including language access services in our recruitment campaigns which featured advertisements on radio and in newspaper and digital outlets.
- We have added Ebony Marketing Systems to our list of M/WBE vendors to strengthen our multicultural recruitment campaign.
- Providing translation services in a diversity of languages including Mandarin, Chinese (Simplified), Spanish, Bengali, Haitian Creole, Polish, Russian, and Urdu.
- Consistently including language access line email and phone in new initiative flyers.
- Continued use of Language Line Services, Inc., to provide telephonic interpretation services.

Section 5. Provision of language access services

A. Interpretation

The plan addresses how the agency will:

- Identify the types of interactions where the agency will provide interpretation services.
- Identify individuals with LEP and their primary language(s).
- Provide (telephonic/in-person) interpretation services.
- Incorporate interpretation to support other public communications, including outreach events, hearings, etc.
- Identify resources (internal and external staffing and contracts) that will be used to manage and deliver interpretation services.
- Ensure quality of interpretation services.
- Ensure effective outreach, engagement, and communications with communities with LEP.
- Establish mechanisms to encourage participation and engagement of communities with LEP.
- Provide telephonic interpretation in at least 100 languages.

Policy Statement

The Department of Probation (DOP) is required by law to conduct Pre-Sentence/Dispositional Investigations and to supervise individuals sentenced to probation by the courts. Fundamental to the preparation of thorough reports and the successful supervision of individuals sentenced to probation, is the ability to communicate clearly and effectively. Through the utilization of qualified language interpreters, DOP employees can communicate clearly and effectively with LEP clients in their primary language. This is especially critical during discussions that could impact an individual's liberty and/or compromise public safety. “I SPEAK” posters, which can be found on the agency’s intranet under Agency Resources / Language Access Services, MUST be highly visible in all departmental client waiting areas as a tool for LEP clients to point to their primary language and to indicate that interpretation assistance is needed. Assistant Commissioners, Branch Chiefs and Family Court Directors are responsible for ensuring that this tool is

always available and is displayed in highly visible areas, at all reception desks and entry points.

Available Interpreter Services

- Telephonic Interpreter Service - via a speaker phone or dual headset where an interpreter on the telephone provides translation.
- Face-to-Face Interpreter Service - for use when the personal presence of an interpreter is more appropriate or effective. This includes sign language for clients who are hearing impaired and who understand sign language.

Procedures

Adult Operations: Investigations/Intake

1. All pre-pleading/pre-sentence and intake interviews should be given in the individual's primary language via a qualified interpreter. This includes bail defendants as well as pens cases.
2. Whenever a qualified interpreter is utilized during the pre-pleading/presentence interview, a notation must be made within the report under the Section entitled "Offender's Statement", indicating the type of interpreter used.
3. The use of an interpreter should always be recorded in Caseload Explorer.

Juvenile Operations: Intake/Investigations

1. All Intake and pre-disposition interviews should be in the individual's primary language. All such interviews shall be conducted with a qualified interpreter. This procedure would include parole and remand cases.
2. Whenever a qualified interpreter is utilized during the pre-disposition interview, a notation must be made within the report indicating for whom the interpreter service was provided and the type of interpreter used.
3. The use of an interpreter should always be recorded in Caseload Explorer.

Adult and Juvenile Operations: Supervision

1. The initial supervision interview and any supervision interview at which the Probation Officer has reason to anticipate that a violation of the conditions of probation will be specifically discussed with the client should always be conducted in the individual's primary language using a qualified interpreter, preferably face-to-face.
2. All other supervision interviews that are not described above shall also be conducted in the client's primary language using a qualified interpreter. However, if the interview is only for the purpose of gathering information, and a qualified interpreter is not available, translation can be provided by a family member, friend or an employee of the Department who is willing to assist in this manner.

- a) Direction and/or referral information cannot be translated by a family member, friend or an employee of the department.
- b) In no case should the minor child of a client, or a client of a criminal justice agency, be used to interpret. In all cases, the name of the person used and the relationship to the client should be entered in the case record.

Definitions

Limited English Proficiency (LEP) individual - an individual who speaks no English or whose English is limited to such an extent as to impair communication and understanding with an English-speaking person.

Primary Language - the language in which an individual with Limited English Proficiency (LEP) is most fluent. This is not necessarily the same as native language.

Qualified Interpreter - an official court certified interpreter, an interpreter procured by the Department through a vendor contract, i.e., telephonic and face-to-face services,

We use Accurate Languages that Interpret over 170 different languages.

B. Translation

All Probation Officers are trained to provide LEP clients with documents in their primary language. The officers know where to find the agency's repository of translated forms/documents stored on the agency's intranet under the Language Access link. If a document is not available in a new client's primary language, the Probation Officer will request that the document is provided in the primary language of the new client. The LAC will ensure that the document is translated to meet the client's need and is stored in the repository for any other LEP client who also speaks this language. Currently, the agency uses Accurate Communications or a DCAS provided vendor for the translation of forms/documents/information. The agency will work towards obtaining a translation contract to meet its needs.

C. Digital communication

Local Law 30 of 2023 requires every New York City agency to develop and implement a three-year Language Access Plan, in consultation with the Mayor's Office of Immigrant Affairs. By improving digital, programmatic access, and providing effective communications for persons that speak no or limited English.

Instructions on how to access telephonic interpreter service can be obtained from one's Branch Chief or Supervising Probation Officer. Face-to-face interpreter services can be requested via the form available on DOP's intranet under Agency Resources: Language Access Services/Request for Language Interpreter. NY Certified employees and employees hired from a language certification can be contacted via the Language Access Coordinator.

DOP will work alongside our Communications Teams to develop digital translation materials via our website and all social media platforms to inform Probation Clients and New Yorkers in general

of our services. We will do this through a campaign in the 10 most spoken languages of our clients. This campaign will be conducted in June during Immigrant Heritage Month as the need arises.

D. Emergency communications

During emergency situations, each Probation Officer contacts their assigned clients and directly communicates with them, including those categorized with limited English proficiency, via cell phone and/or laptop to convey important and time sensitive information. For clients who have limited English proficiency, the Officer utilizes telephonic interpreter services.

The New York City Department of Probation's **Emergency Management Liaison** is **Deputy Commissioner of Administration Andrea McGill**, and she can be reached via phone at **212 510 3818**. Some of the materials DOP might use are:

- Adult Probation Basics booklet
- A Safer City for All palm card
- Your Guide to the Juvenile Justice Process
- NeON Arts
- NeON Nutrition Kitchen
- NeON Sports

This section addresses the following provisions from LL30:

§23-1102b (5) Emergency communication: The information received from Emergency management would be dispatched at Headquarters and then disseminated Citywide as one message.

§23-1102b (11) Staffing & contracts: NYC DOP will put out a general statement via the agency telephone lines.

Section 6. Resource planning

A.

The agency's documents are translated by contracted vendors selected by DCAS for their expertise in language translation. These documents are provided to Agency Heads who determine the client population that should receive the translated documents based on clients' primary languages as recorded in the agency's Electronic Case Management System.

Vendor Name*	Is this vendor a community-based organization?*	Means of procurement*	Type of service provided*	Language(s) the service provided*	Period of service*	Total dollar value of the contract*	Any additional notes on the vendor/contract for MOIA
Language Line Services	No	Non MWBE	Telephonic Interpretation	See below **	7/1/23 to 6/30/24	\$332,313.00	CTA1 781 20217201156
Accurate Communication	No	Small Purchase/MWBE	In-Person Face to Face	Mandarin, Spanish	7/1/23 to 6/30/24	\$5,212.50	POD 781 20232001234
Accurate Communication	No	Small Purchase/MWBE	In-Person Face to Face		7/1/2022 to 6/30/24	10,000.00	POD 781 20242015185
Accurate Communication	No	Small Purchase/MWBE	American Sign Language		7/1/2022 to 6/30/24	5,000.00	POD 781 20242015331

**"Community-based organization" shall mean a non-profit organization providing services to, or operating for the benefit of, a particular community. Community-based organizations may also include a trade union that offers apprenticeship or pre-apprenticeship programs. (21-501)*

** MWBE (Section 311); Small purchase under \$100K (Section 314); Other - please explain*

** Translation; In-person interpretation; Telephonic interpretation; Other - please explain*

B.

DOP needs for telephonic interpretation have been identified as follows, including but not limited to:

- The Contractor would provide DOP with access to qualified language professionals with demonstrated proficiency in any language spoken by residents of the City of New York, including but not limited to the 175 languages listed in the Master Agreement/RFP, as required to meet DOP needs.
- The Contractor would provide on-demand telephonic interpretation for any supported language listed in the Master Agreement/RFP. 24 hours a day, seven days a week.

- The Contractor would provide three-way call handling, as needed, for conversations where it is necessary to create a conference call with a third party to assist in conveying the original caller's needs. This type of call may be required for DOC facilities. It is anticipated that access to three-way calls will be required outside of normal business hours {24 hours per day and 7 days per week}.
- The Contractor would provide training on the use of the Contractor's services, as needed. The schedule for training would be arranged between DOP and the Contractor and provided at no additional charge.
- The Contractor and all its employees and agents would keep confidential all information and not reveal or disclose it to anyone without DOP's prior written consent. The Contractor and its employees and agents would not make use of any such confidential information.

Bi/Multilingual staffing: NYC DOP plans to create a survey to ascertain the language proficiency of its staff— especially the frontline staff so it can have an idea of its language bank. It will also research the Small Business database to identify additional vendors to contract with that are MWBE certified.

C. Partnership with CBOs

The Department of Probation does not currently subcontract to Community-based organizations (CBOs) for language services, but we work with CBOs along with other partners within the NeONs centers to disseminate our information to undeserved communities across the five boroughs. We will continue to amplify this information as the need arises.

Section 7. Training

Training is a two-prong approach:

- First, the LAC meets with the Training Unit quarterly to discuss new classes, schedules, coupled with new Laws and new information. The LAC will attend the academy class and will conduct a presentation.
- Second, the LAC discusses "I Speak Cards" with staff Citywide, e.g., Probation Officers, Supervisors, Branch Chief, frontline staff, managers, inspectors, administrative staff and enforcement staff.

Newly hired Probation officers and agency greeters are educated on the agency's commitment to provide LEP clients with communication in their primary language and on how to secure language translation services. During Academy training by professional trainers, Probation Officers are taught about the rights of LEP clients to receive oral and written communication in their primary language. The Academy curriculum covers the officers' personal responsibility to provide language assistance to LEP clients and their accountability to comply policies and procedures set forth by the agency. The officers receive a palm card with instructions on how to access telephonic services. Additionally, once the Officer graduates from the Academy and is assigned to a borough office, a supervisor re guides the newly hired officer on how to access both telephonic and in person interpreter services, how to best use the I SPEAK cards with LEP clients and how to access the repository of translated documents available on the intranet.

Greeters, who welcome clients in the waiting room, receive customer service training that covers appropriate steps to take when greeting a client whose primary language is not English. “I SPEAK” cards are provided to these greeters, and they are instructed to use the card and personally walk the client over to the Intake Officer or the Supervisory Probation Officer for assistance. DOP’s LAC works collaboratively with DOP’s training division to ensure that all new employees interacting with clients are trained in how to effectively provide language access services along with cultural competence training. Refresher training on language access is provided to all staff every two years during Right to Know Training. DOP’s LAC keeps DOP’s Training Department abreast of any changes to Executive Orders and Local Laws that need to be incorporated in the language access curriculum. DOP offers classroom training on Diversity and Inclusion Best Practices and this curriculum includes a piece on language access services. This course is available to all employees to attend, as so desired.

Training topic	Target staff	Training method & Frequency	Trainer
<i>Language Assess Overview and “I Speak Cards”</i>	<i>New Officers in the Academy Classes</i>	<i>Train New Officers</i>	<i>LAC</i>
<p><i>Language Assess Overview and “I Speak Cards”</i></p> <p>Language Access Training (developed in 2017) which encompasses all these topics:</p> <p>Legal obligations and agency policy on language access</p> <ul style="list-style-type: none"> - When and how to use telephonic interpretation - When and how to use in-person interpretation - When and how to request translation services - How to write/edit documents in plain language 	<p>Existing Staff</p> <p>All staff members</p>	<p>Annually</p> <p>Was offered annually but has not been provided since COVID-19</p>	<p>LAC</p> <p>DOP Training Unit</p>

<ul style="list-style-type: none"> - When to use and not use bilingual staff - How to identify the primary language of a person with LEP - How to track individual's preferred language - How to track whether and how language services are provided to the individual - How to provide culturally and linguistically appropriate customer service to individuals with LEP 			
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Section 8. Continuous improvement planning

- Update the agency’s website so that google translate is not the venue for language translation of the website. Under consideration, as of March 2024.
- Translation of essential documents.
- As identified, DOP will attend relevant training courses available for language access services.
- Additional goals for FY24 include multicultural languages in advertisements on subway shelters and bus terminals.
- Feasibility Meeting w/ CIO and Budget FY25.
- Build a list of language messages for database FY25.

A. Language access complaints

The NYC DOP Language Assess Coordinator is responsible for receiving, tracking, and resolving complaints. We have a plan whereby the requests are submitted two weeks in advance. If the interpreter changes on one side or the appointment date changes on the other side, then we remain to have at least one week and a half to triage any challenges.

The LAC reviews usage reports from language access providers, the clients’ primary language selections from our invoices, as well as the primary languages captured through our case

management system to make educated decisions on the language access needs of our clients and how best to meet these needs.

DOP’s LAC continues to partner with MOIA and other agency partners to learn and share valuable information regarding new resources, new needs of LEP clients and best practices for the provision of language access services.

Given the continual increasing need for language access services, DOP will continue to appropriately adjust its budget and ensure that language access contracts meet the increased demand.

<i>This section addresses the following provisions from LL30:</i>	
§23-1102b (10) Language access complaints	The NYC DOP Language Assess Coordinator is responsible for receiving, tracking, and resolving complaints.
§23-301b 311 Language access complaints	<i>If there is a 311 complaint to the Agency Head, then the “Hello” Coordination will resolve the Commissioner’s Correspondence. {E-Mail or electronic message to the 311-customer service center regarding the reporting of a complaint about language accessibility or a request for additional language services shall be forwarded to both the agency or agencies that such complaint or request referenced and to the office of the language services coordinator.}</i>

Section 9. Goals and actions planning

Each year, the Commissioner re-establishes the agency’s commitment to the provision of language access services to DOP’s LEP clients via a written memo to all staff that emphasizes ongoing support to the LAC in the agency’s efforts to implement the language access plan. The General Counsel, Chief of Staff, Director of Communications, EEO Director/LAC, Deputy Commissioner for Administration, Director of Training, and borough leaders form the agency’s Language Access team. These individuals are held accountable, by the Commissioner, for ensuring that the provision of language access services to all LEP clients complies with all Executive Orders and Local Laws.

Under the direction of the Commissioner, DOP’s LAC is responsible for ensuring that all DOP staff who engage with clients have the tools and resources necessary to communicate effectively and in plain language with our LEP clients. The LAC looks for opportunities to provide videos, brochures and any other educational or informational materials in the languages most spoken by the clients at each DOP location. Probation Officers, borough managers and Executive Management determine which essential documents need to be translated to effectively communication with LEP clients.

The Contractor would provide Telephonic Interpretation Services to ensure effective communication between DOP personnel and clients, as well as other members of the public with limited English-speaking capabilities. The Contractor would ensure that DOP Probation Officers and other authorized

DOP personnel have access to telephonic interpretation services to communicate with clients and other members of the Public at all locations outlined in the service request. It is anticipated that most calls for over the phone language interpretation requests will originate from DOP Branch Offices and court locations across the five boroughs of New York City.

Goals listed in LAIP	Status Update	Next milestone and timeframe
Translation of essential documents and contract an MWBE vendor for translation services	Under consideration	As identified (December 2024 through December 2027)
Attend relevant trainings available for language access services and work alongside the NYC Commission on Human Rights and the Mayor’s Office of Immigrant Affairs to asses’ other relevant trainings for the staff.	Under consideration	Upon identification (Starting in December 2024 through December 2027)
Review and update DOP’s current language training curriculum and policy in collaboration with the Mayor’s Office of Immigrant Affairs	Under consideration	August 2024 through August 2027
Create an agency-wide survey where employees can share their language proficiency.	Under consideration	August 2024 through December 2027
Identify Community-Based Organizations to partner with to disseminate information on DOP’s work.	Under consideration	August 2024 through December 2027
Additional goals for FY25:		
Include multicultural languages in advertisements on subway shelters and bus terminals	Under consideration	Feasibility Meeting w/ CIO and Budget FY24