

LANGUAGE ACCESS IMPLEMENTATION PLAN

May 2024

I. Agency name and language access coordinator

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II. Agency mission and background

The New York City Department of Finance (DOF) administers the tax and revenue laws of the City fairly, efficiently, and transparently to instill public confidence and encourage compliance while providing exceptional customer service. Through these efforts, our dedicated staff interface with the public in a variety of ways on a wide range of topics. DOF collects approximately \$40 billion in revenue for the City and values more than 1.1 million properties worth a total market value of more than \$1.3 trillion. DOF also:

- Records and maintains public property records related to ownership, deeds, and mortgages
- Administers exemption and abatement programs that provide \$3.6 billion in tax relief to property owners and renters
- Adjudicates and collects parking tickets and provides time-saving programs to eligible drivers and businesses
- Manages the City's treasury, with operating cash balances of more than \$12.5 billion
- Acts as the City's chief civil law enforcer, through the Office of the Sheriff
- Advises the mayor's administration on the City's \$200 billion pension system and \$20 billion deferred compensation plan

The City Register records and maintains all official documents related to real estate, including deeds, mortgages, and leases, and has offices in every borough except Staten Island, where the Office of the County Clerk provides these functions. City Register records from 1966 onward are maintained online in the Automated City Register Information System (ACRIS). The City Register also collects mortgage recording and real property transfer taxes.

DOF bills and collects property, business, and excise taxes; the state administers New York City's income and sales taxes. Tax payments are accepted online, by mail, or in person at any of agency's five business centers, one in each borough. Our business centers offer a variety of services, including payment processing, information desk services, parking ticket adjudications, and City Register staff. These centers serve as the most common venue of customer interaction, with over two million transactions a year totaling over \$1 billion.

For all taxes other than property taxes, our auditors monitor tax collections to prevent underpayments and non-payments. DOF collects unpaid taxes and other debt owed to the City through correspondence, phone calls, court actions, and other enforcement mechanisms.

DOF administers personal and commercial exemption and abatement programs. Our

Rent Freeze program helps eligible seniors and people with disabilities to continue to live in the homes of their choice. Veterans, seniors, people with disabilities, and other eligible property owners can apply for exemptions to reduce their tax liability. Commercial property owners can benefit from the City's various tax abatement programs.

Parking and camera violations are one of DOF's chief sources of customer interactions. Vehicle owners can pay or dispute their parking or camera violations online with CityPay, by mail, via our Pay or Dispute app with their mobile device, or in person at any of our five business centers. Administrative law judges hear appeals of parking and camera violations, and the Adjudication Division employs a special unit for commercial vehicles.

DOF values all property in the City—more than 1.1 million parcels each year—to produce the assessment roll. The City's property tax rates are applied to a property's assessed value to calculate the tax its owner must pay. After the City's property tax rates are set each year by the Mayor and City Council, agency staff calculate, bill, and collect property taxes and other property-related charges. The agency also maintains the official tax maps of New York City.

As the chief civil enforcement agency for the New York State Unified Court System, the Office of the Sheriff enforces mandates, orders, warrants, and decrees. The enforcement tools available to the Sheriff include evictions, property seizures, and the booting or towing of vehicles for judgment debt. The Sheriff's Office auctions its seized properties and regularly conducts tax fraud investigations, with a particular focus on the enforcement of cigarette tax and traffic regulations. Recent changes to state law empower the Chief Sheriff to enforce shops selling cannabis with or without a license.

The Treasury Division administers the City's network of bank accounts and manages its cash flow. Treasury staff manage the City's banking relationships and ensure that funds are deposited only in approved banks with appropriate collateral. The division holds all cash bail and court-ordered funds in trust until the funds are directed by the courts to be released. Members of the public interact with the cash bail process when a customer pays a deposit for the release of a person who has been arrested (also known as a defendant). DOF holds the money to help guarantee that the defendant will return to court for their trial. The cash bail is held in a bank account until the court closes the case and issues a court order to refund the cash bail to the person who paid it.

The Office of the Taxpayer Advocate is an independent office within the agency. The Office of the Taxpayer Advocate reports directly to the commissioner and can assist taxpayers with issues they have been not been able to resolve through normal agency channels. The Office of the Taxpayer Advocate can recommend policy changes and request that the agency act on behalf of taxpayers.

The Office of the Parking Advocate independently assists members of the public with parking and camera violation issues and complaints that cannot be resolved through normal agency channels. The office acts as an intermediary between the public, agency units, and other agencies involved in the parking summons adjudication process.

III. Agency language access policy and goals

The goal of the agency's Language Access Implementation Plan is to ensure that all members of the public, regardless of their English proficiency, have access to our information, programs, and services. This goal supports the four pillars of the agency's mission statement: transparency, fairness, efficiency, and customer service.

Beyond this, our policy comports with the intent of Local Law 30: New Yorkers with limited English proficiency (LEP) are provided with meaningful access to DOF's services free of charge. From online forms to in-person interactions with staff, DOF will not only offer free interpretation and translation services but actively publicizes and advertises these services.

We will meet this goal by:

- Identifying the LEP population and its needs
- Providing essential interpretation and translation services to all customer-facing staff
- Training and educating all our staff to identify and serve LEPs
- Ensuring that DOF's most popular and most frequently requested documents are translated

The agency has a variety of avenues through which we will accomplish this work, including public outreach events, customer interactions at our business centers, online resources, and an array of social media channels. Our modus operandi will center on providing interpretation and translation services throughout all public-facing components of the agency.

The agency has a clear definition of success for this plan: regardless of the type of interaction (letter, email, in person, etc.), all efforts will be made to serve New Yorkers with limited English proficiency in their language of choice.

IV. Agency language access accomplishments and progress on goals from previous Language Access Implementation Plan

DOF, recognizing that owners of one to three family homes and condominiums are often exposed to lien sales due to falling behind on property tax payments, developed the Property Tax and Interest Deferral Program (PT AID). The program allows for property taxes to be deferred for a fixed length of time for a temporary hardship, or for a longer period due to a chronic hardship. An application was created and as LEP individuals are also homeowners, the application was submitted for translation and was made available to the LEP community.

In that same vein, the Property Information Update Form was developed. The forms were added to our roster of translated documents. The form allows property owners and other interested parties to update information on addresses and names for the agency to

properly notify owners of bills, notices, and other timely and important events.

New units were created or identified as public-facing areas and as needing access to telephonic interpretation services. Specifically, the Office of the Parking Advocate, the PT AID Unit, the Disability Service Facilitator, and the Contact and the Business Contact Service Centers were developed or identified. Staff of the various units were trained and provided access to the agency's contracted vendor. They provide services to our LEP customers for assistance in parking and camera violation issues, disability access and services, property taxes, and general services.

The Office of The Taxpayer Advocate, an office developed to help solve tax issues that have gone through the regular channels without resolution, determined that its Business Excise Tax brochure would be useful to inform our LEP customers of their rights and responsibilities regarding the reporting of business excise taxes. Accordingly, the brochure was translated and is available on our website.

The agency continues to update and amend our most requested documents that have been translated into the ten required languages. Since our last Language Access Implementation Plan, we expanded that roster of available documents from ten to 30. The documents are available for request through our website, in person at our business centers and outreach events, by 311, by regular mail, and through our case record management system.

V. LEP population assessment

To ensure that the Language Access Implementation Plan keeps pace with the needs of our customers, the agency will continue to review the American Community Survey for the City of New York as future editions are released.

With an estimated 2022 population of 8,335,897 distributed over about 302.6 square miles, New York City is the most densely populated major city in the United States. American Community Survey data indicate:

- 3.2 million New Yorkers are foreign-born.
- Approximately half of all New Yorkers speak only English at home.
- Of the 4 million residents who speak another language in the home, 1.9 million speak Spanish as their primary language.
- More than 719,000 speak Chinese, Japanese, or Korean.
- 21%, or 1.8 million residents, speak English "less than very well."
- The Indo-European languages of Hindustani (Hindi-Urdu), Portuguese, Bengali, Punjabi, Russian, German, French, and Persian are spoken by approximately 438,000 New Yorkers. Several of these are among the fastest growing languages within the LEP community.

The agency analyzes language requests from our customers to determine their needs.

The agency utilizes data collected from interpretation and translation requests made over the phone (including 311), online, from our community partners and other City agencies, and via the agency's customer case record management system. We will continue to monitor requests for interpretation and translations to determine if the roster of languages needs to be adjusted.

The residents of the City of New York depend on the agency as the agency is the central nervous system of New York City government. We collect the revenues that make every city service possible. Public education, police and fire protection, hospitals and healthcare facilities, parks and recreation centers—it all starts with the agency. Anyone who owns or drives a vehicle, owns a home, rents an apartment, or starts a business will interact with the agency at some point. With that in mind, the agency makes every effort to ensure that the LEP community can receive the same level of service provided to all our customers. Free interpretation services are offered at our public-facing areas and the Contact Service Center representatives are all qualified to provide interpretation assistance using our contracted vendor over the phone. The agency has translated more than 30 of the most requested applications, forms, and brochures, which are available on our website or by request in person, by mail, by phone, or by email.

There were 6,259 requests for translated materials, the vast majority for Chinese (44.7%) and Spanish (18.2%). Russian (9.4%), Korean (6.4%), and the other required languages comprised the rest of the requests.

A review of interpretation requests from 2023 indicated that most requests (nearly 98%) were comprised of the ten citywide languages mandated by Local Law 30: Spanish (85.1%), Mandarin (4.4%), Russian (3.4%), Cantonese (1.3%), and French (1%). All other languages accounted for less than 1% of the total interpretation requests.

These statistics represent only direct requests received by the agency. They do not account for the additional materials that are distributed through our community partners, including elected officials, community organizations, and other agencies that request, copy, and maintain translated documents and applications at their various locations.

The agency provides interpretation service through our vendor, Language Line, and more than 300 staff members have been trained to use the over-the-phone service. With the assistance of Language Line, we continue to provide translated documents in the ten languages required by Local Law 30. Every new employee receives training in language access requirements as part of DOF's new employee orientation.

DOF spent \$62,358 on translations. Interpretation expenses totaled \$55,364, for a total of \$117,722 spent on language access in 2023. We will continue to provide these services to the LEP community under the citywide language access service contracts provided through DCAS.

VI. Provision of Language Access Services

The agency provides language access services to our LEP community by having the most requested documents translated into the ten languages required by law. These documents are available for download from our website using private servers or from our kiosks available for public use at our business centers. Most of the documents can also be requested by regular mail, by phone through 311, through our dedicated contact centers, through our case record management system, or in person at our business centers and outreach events. We are currently contracted with Language Line for document translation. The contract is scheduled to end in May of 2025.

The director of interagency relations, in coordination with unit managers and under the direction of the language access coordinator, manages the requests for translation services. Unit managers communicate directly to request revisions of current materials or identify and recommend new documents for translation.

The agency maintains a style guide and glossary which our vendor has accessed to maintain the integrity of the translations. We also accept feedback from staff and the LEP community. Staff are informed of the translation services we provide at regular orientation sessions and are guided to use our intranet for further information.

Language Line provides interpretations in more than 300 languages. The LEP community can request assistance in their language on the phone through our contact service center, 311, or in person at our business centers, walk-in exemption center, adjudication units, or at outreach events.

Interpretation requests are managed by the language access liaison under the direction of the language access coordinator. The liaison is the point of contact with the vendor, maintains records, and provides training and access to public-facing staff.

Visitors who require language access services are given "I Speak" cards at reception areas in our public-facing areas to help identify their language needs. Along with ample signage offering free interpretation services, the LEP community is provided with the support they need to complete their business with the agency.

Our interpretation vendor provides our users with an opportunity to provide feedback on individual interpretations. Endemic issues are reported to the liaison for correction.

Program, frontline, and outreach staff are informed of the interpretation services provided by the agency during regular orientation sessions and are directed by unit managers to review the policies on our intranet.

The agency has two full-time editors who review all print and web content to assure plain language. This includes all our forms, applications, brochures, notices, and documents. Before documents or website information is translated, the editorial team reviews the content for integrity, style, format, and adherence to the agency glossary as well as plain language. Editorial provides training and direction to unit managers on these important guidelines. The editor-in-chief gives a presentation on plain language and customerfriendly communication at all new employee orientations so that all incoming employees are introduced to the concepts. In reviewing documents, the editors ensure that print and web content meet the following standards:

- The action requested of the document's audience is stated clearly and concisely at the outset of the document.
- The document's sequence facilitates easy comprehension, with the most important information first.
- The document has a uniform look and feel; fonts are uniform or complementary, text size is consistent, etc.
- Any instructions or worksheets are concise and easy to follow.
- Each section of the document is clearly distinct from the others, so that the recipient will be able to understand exactly what each section means and where it ends.
- Information is not duplicated unnecessarily.
- Jargon and excessive capitalization are eliminated.
- Obscure examples and instructions are eliminated.
- Text effects (bold, italics, underline) are restricted to the most important information.
- The document's language is clear, and its tone is helpful and friendly using "you" language.
- Caveats (you may not be eligible if ...) and negative language (no, NOT eligible, etc.) are minimized.
- All other DOF style guide requirements are met.

The agency makes great efforts to incorporate plain language principles into our public communications before they are translated. We have developed an agency style guide around several key principles, including:

- Clarity: Communicate in simple, plain language, without sounding cold or abrupt. Avoid jargon, acronyms, and legalese. Use active voice to create a sense of immediacy and to encourage understanding and compliance.
- Simplicity: Break up long sentences. Keep language simple. For example, do not write "utilize" when "use" will do.
- Relevance: Tell readers what they need to know, not what our internal process is.
- Tone: Engage in human rather than institutional communication. Show empathy, demonstrate flexibility and transparency, and, when necessary, admit mistakes.

Policies and procedures on how to identify LEP needs and provide service are maintained on our intranet. Unit managers communicate with the language access liaison, the director of interagency, and the language access coordinator to determine translation and interpretation needs. Free interpretation service availability signage is posted in all our public-facing areas. The signs offer interpretation assistance in the ten languages as well as information on how to file a complaint. Reception areas in our public-facing areas are supplied with "I Speak" cards to help the LEP community.

The vendor is able to provide more than the required 200 languages for over-the-phone interpretation. If an LEP customer requires a translation in a language other than the required, staff are instructed to communicate with their supervisor who then communicates with the language access team. We make every effort to accommodate these requests when it comes to generic notices, forms, and applications, but are not able to provide the service for specific or personalized notices such as property tax bills or parking tickets.

Our language access services are provided whenever and wherever the agency is open for business and through our website 24/7. If a natural disaster or other city-wide emergency should necessitate the closure of our offices or affect our ability to serve customers by phone, notices in all ten languages will be posted on our website.

The agency maintains a list of all staff members' contact information should an emergency arise after hours or on non-working days. The language access liaison is a staff member of Emergency Operations and is assigned to COVID- 19 Operations (general staff), Coastal Storm Shelter Operations (shelter supervisor), and Post-Emergency Canvassing Operations (PECO canvassing assembly point staff). With more than 300 staff members trained in over-the-phone interpretation, the agency can provide these interpretation services in offsite areas such as temporary shelters.

Our interpretation vendor provides service 24/7, 365 days a year. Our translation vendor has provided quick turnaround on special projects in as little as four hours on demand.

VII. Training

The agency understands the importance of training and the importance of staff awareness agency wide. All new staff members attend a mandatory orientation as part of their onboarding process. The language access plan and associated policies are presented and discussed at this orientation, along with background on the importance of language access and an overview of the city's demographics. Staff are informed that more information can be found on the agency's intra-agency website. The training component on language access is performed by the director of interagency Relations and/or the language access liaison.

Staff who work in public-facing units attend over-the-phone interpretation training with the language access liaison. More than 300 staff members have been trained. These units include:

• External Affairs (Correspondence, Outreach)

- Treasury and Court Assets
- SCRIE/DRIE Walk-In Center
- Personal Exemptions Contact Center
- Office of the Taxpayer Advocate
- Collections
- City Register (Land Records)
- Assessors
- Office of the Sheriff
- Tax Audit & Enforcement
- Parking enforcement
- Business center staff

The training provides information on:

- Identifying a customer's primary language
- Using the phone interpretation service
- Best practices for interpretation by phone
- Plain language, cultural competency, and disability communications

The language access liaison provides opportunities upon request for refresher courses to all previously trained staff members.

VIII. Record keeping and evaluation

Monthly reports on interpretation and website translation requests are collected and monitored to see if new trends are emerging, particularly in languages other than the ten required. Staff have an opportunity to communicate with the director of interagency and the language access liaison directly or through their managers should any quality issues arise in both translations and interpretations.

The language access coordinator meets regularly with executive staff to discuss a variety of issues as well as language access concerns. The language access liaison and director of interagency, under the guidance of the language access coordinator, are the point persons for all agency staff. They provide all tools such as translations of forms and signs and "I Speak" cards where needed. The public-facing units all have posters that inform the limited English proficient community how to provide feedback on our customer service.

The language access liaison and director of interagency are also involved in the review and assessment of the vendors that provide the agency with document translation and over-the-phone interpretation. They also represent the language access coordinator at meetings scheduled by the Mayor's Office of Immigrant Affairs. At these meetings, language access representatives from all of the various City agencies share ideas, discuss service contracting options, review survey findings, discuss policy and procedures, and make recommendations for changes and improvements in the provision of language access services.

IX. Resource analysis and planning

The language access liaison and director of interagency report directly to the language access coordinator in her role as assistant commissioner. Unit managers are responsible for monitoring and providing language access in the various public-facing and phone-only contact areas.

Both the interpretation contract and translation contract expire in May of 2025, and the budget and contracting units, along with the unit managers, are working on developing new contracts. The agency has a staff member dedicated to digital communications. The agency coordinates translation requests with the director of interagency relations.

The agency recognizes the value and importance of language access and has placed an emphasis on providing financial resources towards these efforts.

X. Outreach and public awareness of language access services

The agency's strategy for creating public awareness is multi-pronged and encompasses all public communications and interactions produced and sponsored by the agency. The agency sends out millions of pieces of mail per year. Mailings for which a translation is available include a standard insert that reads, "This is an important notice from the New York City Department of Finance. Please read it carefully. This notice is available in Arabic, Bengali, Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu upon request. Call 311 for assistance." This statement is translated into the ten required languages. SCRIE and DRIE notices include a different language insert.

The agency's home page provides a translation link that visitors can click for a dropdown list of available (currently over 100) languages. The translated documents already on the website have links below or beside them that can be clicked on to access the documents.

Our public-facing areas have signs offering free interpretation services posted prominently. In addition, our business centers offer computer kiosks at which members of the public can download translated forms, notices, applications, and other documents. Signage offering the use of these kiosks is displayed in the ten required languages. Staff members at public-facing areas present "I Speak" cards to customers who display limited English proficiency. The cards allow customers to point to the language in which they would prefer to communicate.

Our Outreach Unit, part of the External Affairs Division, which reports to the language access coordinator in her role as assistant commissioner, is fully trained in providing interpretation services. In addition, the Outreach Unit works with elected officials and community organizations to provide support in the languages requested by same.

XI. Language Access complaints

Through a partnership with 311, the agency has established a process to monitor and respond in a timely fashion to public complaints regarding language access. When 311 receives a complaint directed at the agency, our language access coordinator is notified. The complaint is then addressed through the appropriate business unit. Posters in our public-facing areas offering free interpretation services inform the public that they can register complaints directly with the unit manager or call 311. The manager handles the complaint and informs the language access liaison so that endemic issues are resolved.

When 311 receives a complaint directed at the agency, the language access liaison is notified. The complaint is then addressed through the appropriate unit. The agency employs a similar process for complaints reported directly to the agency either by mail or email, or through our Contact Service Center. The staff member receiving the complaint will forward it to the language access liaison for resolution.

XII. Language Access in emergencies

DOF generally does not have a direct role in the City's emergency planning and operations. As the City's collection agency, DOF's billing, collection, and enforcement efforts continue during emergencies. While some enforcement efforts might be reduced, money owed to the City is still due during emergencies.

During the COVID-19 pandemic, DOF ceased booting vehicles with unpaid parking debt and introduced new payment plans and methods of payment, but the communication and billing aspects of DOF's operations remained mostly unchanged.

XIII. Implementation plan logistics

The External Affairs assistant commissioner serves as the agency's language access coordinator and is committed to updating this plan every three years, or sooner if necessary and prudent. This plan will be made available on the public-facing website.

Goal	Description	Responsible Staff	Due
Train all customer-facing	All frontline customer-	Director of Interagency	Rolling
staff in using the over-	facing staff should be	Affairs	
the-phone interpreter	prepared and able to use		
	the Language Line		
	service. This requires		
	attending a one-hour		
	training prior to		
	Language Line access		
	codes being issued.		
Make all new staff aware	Continue participation in	Director of Interagency	Rolling
of the language access	the new employee	Affairs, Language Access	
requirements and how	orientation to make DOF	Coordinator, Editor-In-	
DOF implements them	staff aware of how DOF	Chief, Employee Services	

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	implements language	Education, and	
	access and how these	Development Team	
	requirements apply to		
	every employee		
	regardless of job		
	position or function		
Procure language vendor	Current translation and	Office of Contracts &	May 2025
for 2025 and beyond	interpretation contacts	Procurement	
	expire in May 2025. DOF		
	will need to procure a		
	vendor to provide these		
	services beyond that		
	date.		
Explore translation	DOF launched a new	Director of Interagency	FY 2024-2025
functionality for website	website. Explore an	Affairs, Language Access	
	external service that can	Coordinator, Finance	
	offer translated versions	Information Technology	
	of those web pages.		
Participate in all Mayor's	DOF participates in most	Director of Interagency	July 2024 - Rolling
Office of Immigrant	Mayor's Office of	Affairs, Language Access	
Affairs convenings for	Immigrant Affairs	Coordinator	
updates, latest news,	convenings but commits		
and experience-sharing	to full attendance and		
	participation		
Expand translated	DOF has many forms,	Director of Interagency	January 2025 - Rolling
material	publications, notices,	Affairs, Language Access	_
	etc. that are not part of	Coordinator	
	the most requested but		
	can still explore		
	translating a wider		
	variety of these		
	documents		
Review and revise Rent	New legal programmatic	Senior & Disabled	July 2025
Freeze Program	changes to the Rent	Programs Unit, Director	
applications	Freeze Program will	of Interagency Affairs	
	require updating		
	documentation and		
	forms		
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