



LANGUAGE ACCESS IMPLEMENTATION PLAN

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Signatures

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Find information related to language access and the agency's LAC on the OATH website: <https://www.nyc.gov/site/oath/about/language-access-plan.page>

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I. Agency Mission and Services

Overview:

The Office of Administrative Trials and Hearings (OATH) is the City's central independent administrative law court. OATH is currently comprised of three separate divisions which are responsible for hearing disputes on different types of cases. The divisions include:

1. The OATH Trials Division
2. The OATH Hearings Division
3. The OATH Special Education Hearings Division

Additionally, OATH provides professional training and CLE courses for the City's Administrative Law Judges, Hearing Officers and OATH Practitioners through the [Administrative Judicial Institute \(AJI\)](#). OATH also provides conflict resolution support and resources, including offering free workplace mediation to City employees and City agencies, as well as mediations between members of the public who are in conflict with small business owners over quality of life issues through MEND NYC through [The Center for Creative Conflict Resolution](#).

The Mission of OATH

The mission of OATH is to provide fair and timely hearings on the cases that are filed with it by New York City's various agencies, boards, and commissions. At its Hearings Division, OATH strives to hear cases fairly and efficiently while providing the public with access to justice. OATH's Trials Division hears complex administrative law cases which can be filed by any city agency, board or commission; cases are heard with fairness to all parties appearing before it and follow strict applications of the rules of evidence and the rules of civil procedure. OATH's Special Education Hearings Division's (SEHD) provides fair and neutral impartial hearings to resolve disputes between parents of students with disabilities and the New York City Department of Education (DOE).

Some additional details are set out below.

OATH Trials Division:

The Trials Division is allowed by law to hold administrative hearings on cases brought by any of the City's agencies, boards, or commissions. Administrative Law Judges (ALJs) conduct OATH Trials. ALJs are appointed to five-year terms by OATH's Commissioner and Chief Administrative Law Judge. The five-year appointment of the OATH's Judges ensures absolute independence and impartiality in the judicial decision-making process and provides parties with a fair and impartial forum where complex administrative matters are adjudicated. Settlement conferences precede most trials. The Trials Division is responsible for hearing disciplinary cases relating to the City's more than 325,000 civil servant workforce. OATH also holds trials on a diverse range of administrative matters including: human rights and discrimination cases, car seizure

cases, license revocation cases, and complex contractual disputes, among other types of cases. Settlement conferences and trials can be conducted with parties appearing remotely over webcam or in person in OATH courtrooms. In person simultaneous translation is available in top five languages with advanced request, and over the phone interpretation, with the interpreter appearing on speaker phone for the judge and the parties, is available in up to 250 languages.

OATH Hearings Division:

The OATH Hearings Division conducts hearings on summonses issued by nearly every single enforcement agency. OATH, however, is not the administrative court that handles parking tickets. OATH Hearings are conducted by Judicial Hearing Officers. In the OATH Hearings Division, hearings are conducted on alleged quality-of-life and public safety violations that can be filed by more than 20 different City agencies, such as the Departments of Sanitation, Buildings, Fire, Environmental Protection, Consumer and Worker Protection, Parks and Recreation, NYPD, among others. In addition, OATH holds hearings on summonses issued by the Taxi and Limousine Commission (TLC), the City's Police Department and the Port Authority of New York and New Jersey for alleged violations of TLC and other City rules. OATH also holds hearings on summonses issued by the Department of Health and Mental Hygiene (DOHMH) regarding alleged violations of the City's Health Code and other laws affecting health. Each year OATH receives approximately 800,000 summonses from these enforcement agencies. For those respondents who wish to contest the charges, OATH provides the neutral forum where the parties can have their side of the case heard. Each year OATH conducts approximately 250,000 hearings on City-issued summonses. OATH provides several types of hearings methods for the convenience of the public. Summons recipients may request a hearing in person, hearing by phone, or in certain cases where the agency chooses not to appear to prosecute their case, may submit a defense in writing. All hearing methods can be conducted in up to 250 languages. Since the beginning with the COVID-19 pandemic of 2020, OATH's most popular hearing method has been hearings by phone, which allow respondents and agencies to appear by phone and email evidence. To reduce wait times, OATH instituted a call-back function which allows a respondent to check in and get a call back when the hearing is ready to proceed.

As of June 2017, OATH also became responsible for adjudicating decriminalized quality of life summonses that used to go to criminal court and are issued by the NYPD and Parks Department. Since 2017, OATH has been responsible for providing a community service option for quality-of-life charges that traditionally had gone to the City's Criminal Court. The option is satisfied by respondents either before or after the hearing by completing either a 1-hour or 2-hour online e-learning module that teaches respondents why these quality-of-life charges are against the law and the negative impact that the violating behavior has on our communal environment and quality of life. If respondents have cases that require four or more hours of community service, the program is administered through OATH's Center for Creative Conflict Resolution with the respondents participating in a restorative "circle" facilitated by Center staff. The community service e-learning module is available in the top ten languages and all restorative circles can be conducted with the assistance of over the phone translation services in up to 250 languages if any of the participants require the session be

conducted with that language assistance.

OATH Special Education Hearings Division:

OATH's Special Education Hearings Division's (SEHD) provides fair and neutral impartial hearings to resolve disputes between parents of students with disabilities and the New York City Department of Education (DOE). Cases in the Special Education Hearing Division are decided by OATH Impartial Hearing Officers (IHOs). OATH IHOs are appointed to four-year terms by OATH's Commissioner and Chief Administrative Law Judge. Four-year appointments help ensure IHOs' independence and impartiality. Each IHO is an experienced attorney who has been trained and certified by New York State. IHOs have sole authority to issue orders and make decisions on the cases before them. Settlement conference may precede a hearing. Both settlement conferences and hearings can be conducted with the parties appearing remotely over webcam or with parties in person at an OATH hearing location. Both settlements and hearings can be completed in up to 250 languages using on demand, over the phone translation.

The Direct Public Services Offered by OATH

Overview of the Direct Public Services and Information Resources Provided by OATH

The agency does not provide basic city services, such as government benefits, licenses, permits or registrations; but, OATH does provide direct public service in that it provides New Yorkers with due process rights and the forum at which someone charged with committing a violation has the right to offer their defense to those charges. In this way, OATH provides direct public service at its trials and hearings and through the operations of its Clerk's Office. It also provides some direct public services through its Help Center, which provides substantive help sessions to self-represented respondents and small businesses who appear to fight summonses at the OATH Hearings Division.

Details Regarding the Direct Services and Information Resources Provided by OATH

The direct public services offered by OATH include public services offered at trials, at hearings, at Help Centers and by its Clerks Office. These services are described below:

- *Trials Division:* OATH holds trials for City agencies, boards and commissions. Some details about the trial process are:
 - Before a trial takes place, an OATH Administrative Law Judge (ALJ) usually discusses the case with the parties. That discussion is called a settlement conference. Sometimes cases are settled this way. If so, there is no need for a trial.
 - If the case is not settled, a different ALJ hears the case by listening to witnesses and reviewing other evidence from each side. This is a trial.
 - OATH offers limited-English proficient (LEP) persons free interpretation services at settlements and trials. Sign language interpretation is also

provided for free upon request but must be requested in advance. Some cases have in-person simultaneous professional interpretation, other cases have telephonic consecutive interpretation. In rare cases where the respondent is an LEP, and a witness is also a LEP, we may require our vendor to provide two simultaneous interpreters (in some instances, in two different languages) at the same time.

- After the trial, the ALJ writes a decision. In some kinds of cases, the ALJ recommends (suggests) to the head of the agency that filed the case on what action should be taken. In other kinds of cases, the ALJ makes a final decision that can only be appealed to the New York State Supreme Court. OATH decisions can be lengthy and on average tend to be at least 10 pages long, excluding footnotes and case citations. Respondents may request that they be sent a translation of the decision once it is issued, however, for appellate reasons there must be one official decision which must be the English version; so OATH will include a disclaimer that states that nothing in the translated version of the decision can be used as the basis of an appeal.

- *Special Education Hearings Division (SEHD)*: OATH provides fair and neutral impartial hearings to resolve disputes between parents of students with disabilities and the New York City Department of Education (DOE).
 - SEHD hears cases filed under the Individuals with Disabilities Education Act (IDEA) and Section 504 of the Rehabilitation Act of 1974 (Section 504), which are federal laws. IDEA requires that students with disabilities get appropriate special education services. Section 504 prohibits discrimination against students or parents with disabilities.
 - Parents or the DOE will bring cases when they disagree about the educational needs and/or services for their child.
 - Hearings are conducted remotely over webcam, but parties can request in-person hearings. All hearings can be conducted with an over-the-phone translator in up to 250 languages.
 - All informational materials, applications and forms used in the OATH SEHD hearing process are available in the top ten languages and Yiddish, due to a continued high-volume use of Yiddish interpretation at hearings.
 - After the hearing, the IHO will write a decision. Decisions include findings of fact and conclusions of law. The Decision may also include an order directing the DOE to take certain action or provide other relief for the student. Decisions are binding and can be enforced in State or Federal court. Decisions are confidential and only provided to the parent and the DOE. If a party disagrees with the IHO, the decision can be appealed to the State Education Department's Office of State Review.
 - If requested, OATH will translate the decision into the language of preference of the parent. OATH has document translation in up to 250 languages.

- *Hearings Division:* The OATH Hearings Division adjudicates (issue decisions) on summonses that have been issued by the City's various enforcement agencies.
- When a City agency writes a summons, the person or business named as "respondent" on the summons must contact OATH to take care of the summons.
 - Some summonses can be admitted to and paid without attending a hearing; however, other summonses require the respondent to attend a hearing at the OATH Hearings Division. OATH offers Limited- English proficient (LEP) persons free interpretation services at all hearings, despite the hearing method used.
- If the person or business named as the respondent is going to appear at the OATH hearing without representation, they are eligible to have a help session at the Help Center. All Help Center sessions can be conducted in up to 250 languages using the agency's telephonic interpretation services.
- If the person or business named as the respondent wants to contest (fight) the charges contained in the summons but doesn't want to come to a hearing at OATH in person or OATH offices are closed due to an emergency such as the COVID-19 pandemic, cases can be resolved by submitting a defense to the charges (and thus having a hearing) online, by mail or over the phone. OATH offers limited-English proficient (LEP) persons free interpretation services for these types of hearings.
 - OATH will accept defenses that are written in foreign languages and have those written defenses translated by a third-party vendor, free of charge, before the defense is assigned to a Hearing Officer for adjudication.
 - OATH offers free, professional over the phone interpretation in up to 250 languages for Hearings by Phone and Hearings in Person.
- After a hearing is held, the person or business named on the summons gets a written decision that says if the person or business won or lost the case (in other words, if the case was "dismissed," or found "in violation"). Decisions are sent in the mail.
 - Each decision is accompanied by a double-sided flyer that provides instructions on how the respondent can request a copy of the decision in the language of their choice. It explains that the official decision is the English decision that has been sent. This message is translated into the top 10 foreign languages used in the city, which are also the top 10 languages requested by respondents at OATH's Hearings Division.
- OATH Hearings Division also has an Appeals Units which decides appeals of hearing decisions. An appeal may be filed by the party who lost the case. This may be the person or business named as "respondent" on the summons or the city agency that wrote the summons and filed it with OATH for a hearing.

To appeal, the party (person, business, or city agency) that disagrees with the decision, sends an appeal application to the OATH Hearings Division and to the agency that issued the summons. The party writing the appeal must say why, in its view, the hearing decision was wrong. The Rules for appealing cases can be found on the OATH website.

- OATH makes appeal application forms available in up to 10 languages. OATH also offers appeals online.
 - Under LL 30, since 2018 OATH has increased the number of languages that it makes its forms available in to 10 languages. However, respondents will still be able to submit written defenses, appeals and forms in any languages, regardless of whether a form is provided in that language. Respondents will be alerted to this fact with notices on the website and on form pages.
 - When OATH accepts forms written in a foreign language, it has the form translated into English by a professional, third-party vendor, free of charge to the respondent before it is given to the appropriate unit for further action.
- When a hearing decision is appealed, both parties (the person or business named on the ticket and the City agency) receive a written appeal decision in the mail that says who won or lost the appeal.
 - In the coming year, OATH plans on setting up a process by which the Appeals Unit sends out the official English version and the Public Affairs Unit is notified and sends a translated version of the appeal decision in the language used by the respondent when the respondent submitted their original appeal application in a different language or on a translated form.

OATH Help Centers at all Hearings Division Office Locations

OATH, as an administrative law court, is meant to be accessible and a court where one can go and represent themselves. No representatives, attorneys or so-called “expeditors” are necessary. However, some people may feel as though they do not understand the proper way to handle a summons when they receive one. To ensure that both the respondent and agency are on equal footing and can both come prepared to their hearings, in 2017 OATH established Help Centers at every Hearing Division location to provide unrepresented persons with legal information and other resources so that they can handle their case on their own. All Help Center locations are staffed with Procedural Justice Coordinators, the Help Centers are overseen by the OATH Ombudsperson. Procedural Justice Coordinators have access to and have been trained on and use over the phone interpretation which is available in over 250 languages when they encounter an LEP at the Help Center.

- The Help Centers help unrepresented persons to: understand the charges against them; learn their legal rights; learn the meaning of legal terminology; navigate the procedural process; fill out necessary forms; understand the nature, methods and format of hearings; request a reschedule date or an adjournment; file an appeal; vacate a default judgment; navigate the rules of the City agency that issued the summons so that they understand what is and what is not allowed; and more.

The Help Center, since the onset of the 2020 pandemic, has also provided services remotely and most interactions continue to be over text message, phone, or email. The Help Center prides itself in its response times to inquiries from respondents seeking assistance. This is because cases have many legal deadlines that must be met, under OATH procedural rules. In FY 2024, the Help Center had a response time to inquiries that came in over email that was on average less than a day (0.37 days). When Help Center staff encounter a LEP respondent they will follow up with them over the phone so that they can use over the phone translation services, which are available in up to 250 languages.

The Help Center also makes available more than a dozen [fact sheets](#) for common issues and inter-agency processes such as information related to curing, correcting, settling summonses, as well as information related to specific types of respondents or industries. Most of those fact sheets have been translated into the top ten languages spoken in NYC and each month OATH is working towards translating more of those resources, while staying within its translation budget.

OATH Clerks Office

Clerks in the Clerk's Office are responsible for assisting those respondents who come to OATH for in-person hearings or call OATH with questions about the status of their case or seek information about the options available to them. Clerks also manage the hearing calendar for the OATH Hearings Divisions; they field requests to reschedule hearings as well as help cases flow throughout the day by making sure OATH's Hearing Officers have the case files and other necessary materials needed to conduct hearings in an efficient, fair and orderly manner. The Clerk's Office is also responsible for accepting payments, processing penalties, and mailing out the Hearing Officers' decisions and other notices.

Clerks are trained on, and use, Language Line to communicate in over 250 languages with LEP respondents who call over the phone and who appear in person. The public can get information and assistance from clerks on many topics including the following:

- Requesting Phone Hearing PINs to sign in for hearings (at that time, the clerk will alert adjudication staff that an interpreter for the hearing, is needed).
- Getting a new hearing date.
- Getting information on the status of their cases.
- Getting information on penalties they need to pay.

Trials Division Calendar Unit

Among other jobs, the OATH Calendar Unit clerks get over the phone interpreters for LEP persons. This happens most often in vehicle-seizure trials and in trials in which taxi drivers might lose their licenses. In rare instances, in-person interpreters are requested for Trials and the Calendar Unit facilitates these requests and bookings.

Interactive Voice Response Phone Line

OATH's Interactive Voice Response (IVR) telephone system (1-844-OATH- NYC) provides full information to the public in 4 different languages, with menu options in 8 different languages. Information contained in the IVR includes recorded information

about the hearing and appeal processes. For most cases, the IVR also provides callers with case-specific information regarding the status of the case, the case outcome, outstanding payments and other information, if the caller has their summons number or their Trials Division docket number.

Social Media and Electronic Media

As an administrative law court, OATH does not actively engage with respondents over social media due to the fact that contact with OATH must be over official channels since there are many legal and official deadlines that must be met and opening up channels of communications such as social media would potentially confuse the public who may be lead to believe that they can interact with the agency beyond the official channels laid out in our rules.

II. OATH’s Language Access Policy and Goals

The Goals of OATH Language Access Plan

The overall goal of OATH’s Language Access Implementation Plan (LAIP) is to provide language access services so that persons with limited English proficiency (LEP) have meaningful access to OATH’s direct public services. This includes making sure that LEP persons can get information about OATH’s direct public services and that LEP persons can participate in OATH trials, hearings, and proceedings in the language of their choice.

Part of this goal is to provide a welcoming environment to LEP persons, including an environment that makes it easy for OATH employees to communicate with members of the LEP community. OATH will work towards providing seamless communication with LEP persons. More specific goals are set out below.

Language Access Policies

OATH has a strong commitment to language access and has even codified its policy of everyone’s right to language assistance services in its own agency rules. OATH understands that language access is a vital part of providing true due process and access to justice at OATH hearings and trials.

See Hearings Division procedural rules (§6-03 Language Assistance Services):
<https://www1.nyc.gov/site/oath/hearings/subchapter-a-general-matters.page#6-03>

See Trials Division procedural rules (§1-44 Interpreters):
<https://www1.nyc.gov/site/oath/trials/chapter-i-subchapter-d.page#144>

All OATH Judicial Hearing Officers, Impartial Hearing Officers and Administrative Law Judges must adhere to the City’s Code of Conduct for Administrative Law Judges and Hearing Officers. The Code of Conduct states that “A City administrative law judge shall take appropriate steps to ensure that any party not represented by an attorney or other relevant professional has the opportunity to have his or her case fully heard on all relevant points,” including “being attentive to language barriers that may affect

parties or witnesses.”

All Judicial Hearing Officers, Impartial Hearing Officers and Administrative Law Judges and Help Center staff ask each respondent if they require interpretation services at the beginning of each proceeding or Help Session. Hearing Officers, ALJs and Help Center staff do not allow family members or OATH staff to be used as interpreters. OATH will always use a professional third-party service when providing services to the public to ensure the accuracy and impartiality of the interpretation.

III. Language Access Needs Assessment

OATH has already made significant progress towards its goal of providing language access services, as follows:

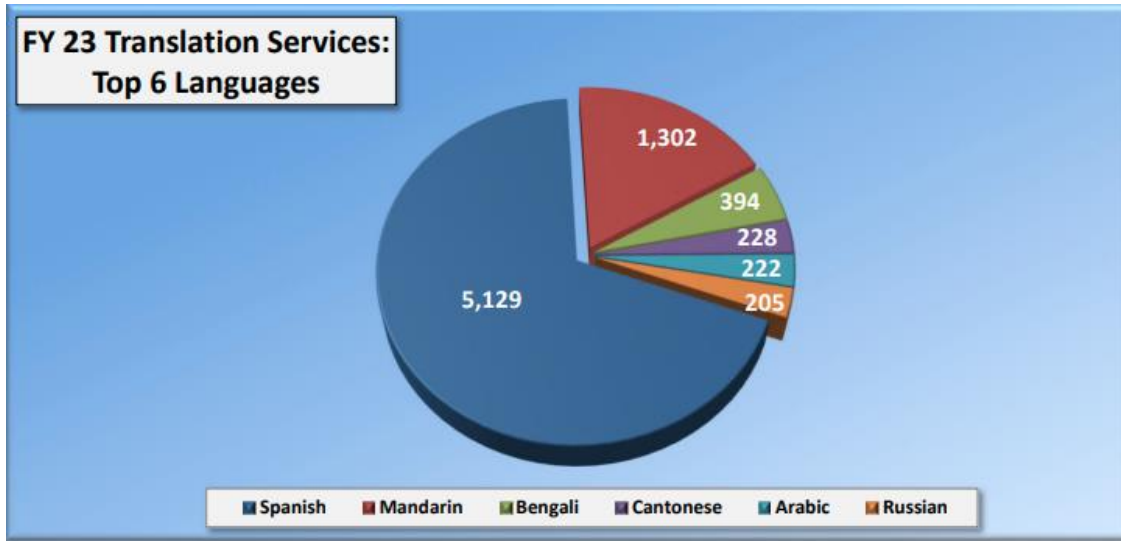
How OATH will execute the U.S. DOJ “Four-Factor Analysis”

City entities have flexibility to decide what language assistance is appropriate for their service populations. In deciding, the agency must do an analysis based on the four factors set out by the U.S. Department of Justice (DOJ).

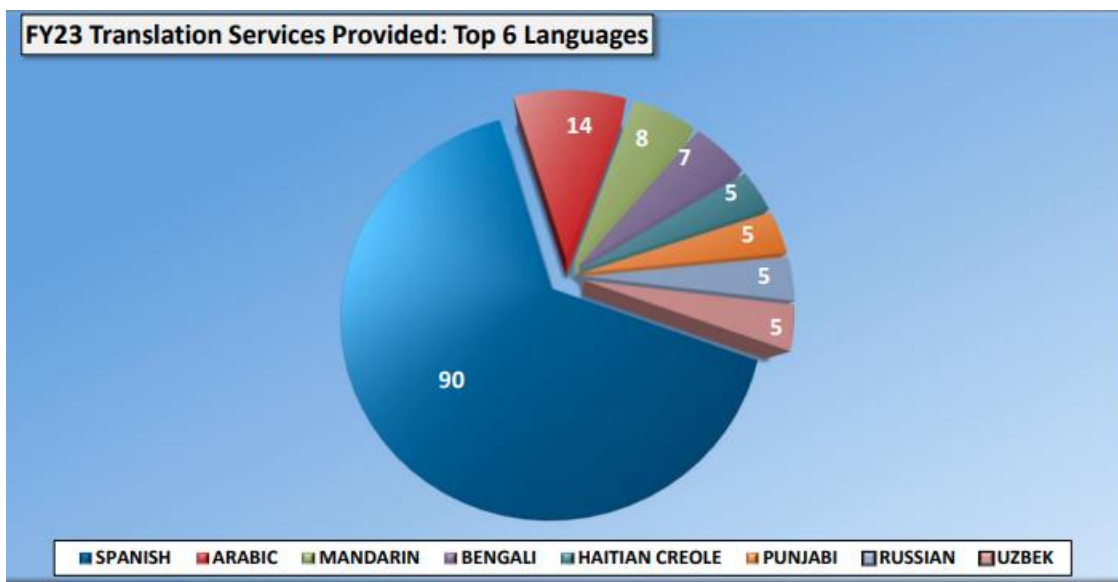
Factor 1: The number or proportion of LEP persons in the eligible service population. OATH processes approximately 700,000 summons cases each year. Any person can receive a summons. OATH can estimate the proportion of LEP persons in the service population by comparing the number of hearings that are done with professional third-party interpreters with the number of hearings that are done without interpreters. This will let OATH estimate the proportion of LEP persons in its service population.

Factor 2: The frequency with which LEP persons come in contact with the agency. OATH can estimate the frequency with which LEP persons come into contact with OATH by reviewing reports from its interpretation contractor to see how often LEP persons have hearings. Those reports indicate the number hearings at OATH’s divisions in which interpretation services were provided in a given period of time. The reports also indicate the languages in which the hearings were conducted. This will let OATH estimate the frequency (how often) LEP persons come in contact with each of OATH’s divisions and the languages LEP persons were using.

Here are the top languages requested for hearings in FY23:



Here are the top languages requested for trials in FY23:



Factor 3: The importance of the benefit, service, information, or encounter to the LEP person (including the consequences of lack of language services or inadequate interpretation/translation).

OATH looks at the importance of providing language assistance services to its LEP population in the following ways:

Trials and Hearings: Fair and impartial trials and hearings are essential to due process. Accordingly, OATH's first step was to provide interpretation services at pretrial conferences and trials at the OATH Trials Division and at hearings at its Hearings Division. This is because it is important that LEP respondents:

- Make themselves clearly understood at trials and hearings.
- Understand everything that occurs at trials and hearings.

Clerks: Clerks provide important information about OATH services.

- OATH provides interpretation services for conversations with its clerks.

Documents: It is important that key documents, including key informational and website materials, be translated.

- OATH has translated all informational brochures about the hearing processes at each of its divisions into the top ten (10) languages spoken by respondents at those tribunals.
 - OATH has made its website translatable so that online information as well as online application forms can be easily translated into different languages.
 - Forms can be submitted in any language, regardless of whether or not the form is available in that language. In other words, OATH will have the foreign language submission translated free of charge to the respondent, regardless of the language it is submitted in.

Factor 4: The resources available to the agency and the costs of providing various types of language services.

OATH has designated the following resources for language assistance services:

Personnel: OATH has designated a Language Access Coordinator, who will be assisted by OATH staff as needed.

Translation & Interpretation: OATH has set aside money in its budget for contractors on an ongoing basis for the following purposes:

- Interpretation contractor for interpretations at trials and hearings and for interpretations of clerk conversations and settlement conferences.
- Translator contractor for translations of documents, brochures, signs and any document submitted by a respondent in a foreign language.

Equipment: OATH has already set aside money in its budget, or does so on an ongoing basis, for the following costs:

- Signage.
- Telephone equipment needed for interpretation services.
- Other equipment, including computers and formatting programs used for the creation of PowerPoint or other informational materials.
- Supplies such as toner, special brochure paper and folding machines to create, update and continuously provide, translated informational materials for the public in OATH waiting rooms.

Training: OATH staff is trained using the following resources:

- In conjunction with the interpretation contractor, employees are trained on using equipment needed for over the phone interpretation services.
- In conjunction with its interpretation contractor, employees are trained (and retrained as needed) on working with interpreters and on accessing and using the services.
- OATH's Administrative Judicial Training Institute (AJI) provides training on

cultural competency, diversity and cultural sensitivity.

- All OATH staff receive training on when interpreters should be used.

Surveys: OATH will set aside staff resources as necessary to conduct periodic surveys of both the LEP persons and OATH staff who use OATH's interpretation and translation services to assess the quality and sufficiency of those services.

OATH takes the four U.S. DOJ factors into account on an ongoing basis, as it implements, revises and revamps its Language Access Plan.

How OATH has Traditionally Determined its Foreign Languages

Per Local Law 30, language access services must be provided in at least the top 10 LEP languages as those languages are determined by the Department of City Planning and also "as those languages are relevant to services offered by each agency".

To determine the top ten (10) foreign languages of its service populations, OATH has reviewed data on how many trials and hearings have been interpreted at each of its divisions, and the languages used during those trials and hearings. This data is a good indicator of the languages spoken by each division's service population because OATH's service population is in large part made up of persons who are required to contact OATH's divisions to respond to charges that have been filed at each respective division. OATH has also reviewed City Planning data. A review of translation usage data indicates that the top ten (10) languages used by OATH are the same languages that are mandated by Local Law 30. Where there is a language that is requested in higher frequency than any of the top ten languages, OATH will translate materials into that language. The Special Education Hearings Division experienced high volume of requests for Yiddish and consequently it translated all forms, applications and informational materials into Yiddish.

Evaluation of Service Population LAS Needs

OATH is the City's independent administrative law court. It typically receives more than 800,000 cases each year and holds hearings or trials in more than 300,000 cases. Since everyone in NYC is subject to the City's rules and regulations, everyone in the City is subject to being summoned to OATH if/when they break a City rule or law. For this reason, OATH's service population is the same as the city, as a whole. There are, however, some exceptions where supplemental languages are considered.

How OATH Decides If Implemented Language Access Plan Is Successful

To decide if OATH has successfully implemented its Language Access Plan (in other words, done everything it should do under the Plan) OATH staff:

- Looks at data from its language interpretation contractor to be sure that its interpretation service is being used on a regular basis.
- Conducts surveys of OATH staff about their experiences with LEP persons to be sure their experiences indicate they are effectively

communicating with LEP persons.

- Conducts surveys of the LEP persons who use OATH translation services.
- Provides training to clerks and Hearing Officers on how and when to use interpretation services with respondents.
- Reviews the OATH Language Access Plan periodically.
- Has a Language Access Coordinator to implement and monitor compliance with the Language Access Plan on an ongoing basis.
- Maintains records of compliance with the Language Access Plan.
- including the submission of an annual report to the Mayor's Office of Operations.

IV. Notifying Respondents and Using Language Assistance Services

- The OATH website has google translate. This feature allows someone looking at any OATH website page or online form to translate that page or form easily. While not ideal, the website is written in plain language where possible (i.e. legal rules of procedure that are set in law cannot be translated into plain language, but the procedural rules are reflected in the instructions, forms and information that fills the webpages of the website).
- *Over the Phone Interpretation:* Interpretation of in-person trials and hearings is available for LEP persons in using over the phone interpretation in up to 250 languages. Interpretation is also available for LEP persons who call or visit the hearings divisions with questions in over 250 languages through the use of over the phone interpretation.
- *Signs:* OATH has translated important permanent entry-way signs posted in its offices into Spanish or other citywide-designated languages, if space provides. Translated information in up to ten (10) languages at OATH offices has been placed on Powerpoint-type presentations. There are multi-language notices in each facility that advise respondents of their right to language assistance services as well as signs advising respondents of their right to lodge complaints about language services to 311.
- *Documents:* OATH has translated all key documents into the top ten (10) foreign languages.
- *Media and Outreach:* OATH translates its press releases and event flyers into relevant languages. If, for instance, OATH is holding an event in Chinatown or in Flushing, then those documents are translated into Traditional Chinese. OATH uses its community partners to inform OATH of the language needs of the community we are presenting to. (OATH partners with elected officials and CBOs when conducting outreach and does not conduct outreach in a neighborhood without a partnership or co-sponsor in place). OATH also has in-person translators available at all events where there has been outreach to the service population. These documents are written in plain language before they are translated and then disseminated.

V. Provision of Language Access Services

Interpretation

OATH already has free professional interpretation services for more than 250 languages at all conferences, Help Center sessions, clerk interactions, trials and hearings.

The Trials Division had provided interpretation at trials since the 1990s. Interpretation is usually done over conference phones using a professional, third-party interpretation service, such as Language Line Inc. The service is available in over 250 languages. However, an Administrative Law Judge may decide it is necessary to use a professional in-person interpreter and one will be scheduled for a future trial date.

The Hearings Division started providing professional language interpretation service in November of 2007. When OATH took over the operations of the Health Department's (DOHMH) administrative hearings and the administrative hearings conducted by the Taxi and Limousine (TLC) in 2011, OATH ensured that these hearings had the same language assistance services it was employing for the other hearings it was already conducting. In 2016, OATH took over the cases previously handled by the Department of Consumer and Worker Protection and ensured those cases had the same access to interpretation and translation services and OATH did the same with Criminal Justice Reform cases. Since 2022, OATH when OATH established and started hearing cases in its Special Education Hearings Division it ensured that the same language assistance services were available for those hearings.

- Interpretation for LEP persons at the OATH Hearings Divisions is done over conference phones, using a professional, third-party interpretation service, such as Language Line Inc.
- OATH clerks at check-in assist in identifying and then assisting LEP persons using over the phone interpretation services.
- Once the language is identified by a clerk or with the aid of the third-party interpretation service, OATH clerks arrange for an interpreter at the hearing.
- Clerks and Help Center staff who receive calls from LEP respondents can use over-the phone interpretation to speak to the caller in their preferred language.
- Clerks and Help Center staff who deal with LEP respondents in person have instruction sheets written in ten LEP languages. These sheets tell LEP persons that staff is contacting an interpreter to proceed with the hearing. Sometimes, the third- party interpretation service is used to communicate this fact.
- OATH reception counters and windows and OATH hearing offices have desk top signs, written in sixteen different languages, saying that free interpretation service is available to respondents.

- All virtual hearings (webcam or telephone hearings) have over-the phone interpretation. In the Hearings Division, where there are instructions relating to call-back options to avoid long wait times and other options, recordings are available in Spanish Mandarin, Cantonese which are the Hearings Division's languages of highest volume. OATH will explore ways to expand these recordings, if cost allows, in the future.

Translation

- OATH has translated all essential documents into the top ten (10) foreign languages for all adjudication divisions and expanded the list of languages to include Yiddish for the Special Education Hearings Division.
- OATH has translated all documents of key importance into the top ten (10) foreign languages and expanded the list of languages to include Yiddish for the Special Education Hearings Division.
- OATH has translated all informational and educational documents into the top ten (10) foreign languages and expanded the list of languages to include Yiddish for the Special Education Hearings Division.
- OATH has translated all forms and applications into the top ten (10) foreign languages and expanded the list of languages to include Yiddish for the Special Education Hearings Division. OATH accepts forms and applications in up to 250 languages and will have the form translated into English before assigning it to the relevant unit for processing.
- OATH translates promotional documents into certain applicable foreign languages, as determined by event partners and/or target audience. For all promotional documents that are not translated there is a boiler plate added that says the following in the top ten languages: *Need help in your language? Visit nyc.gov/oath or call 311 for assistance.*
- For all temporary signs that are not translated there is a boiler plate added that says the following in the top ten languages: *Need help in your language? Visit nyc.gov/oath or call 311 for assistance.*
- All translated documents on the OATH website are linked by the name of the language of the form in that language. It used to list the language in English: (Spanish) (Arabic) (Bengali) (Chinese), etc. Now the links appear like: (Español) (اللغة العربية) (বাংলা) (中文), etc.
- OATH now displays posted signs using universal symbols, or English and Spanish. Where the text of a posted sign is informational and of key importance, OATH makes that text available in the six top LEP languages by other means, such as by PowerPoint presentation in waiting areas and/or by

translated handouts.

- All hearing decisions are accompanied by a double-sided flyer that provides instructions on how the respondent can request a copy of the decision in the language of their choice. It explains that the official decision is the English decision that has been sent. This message is translated into the top 10 foreign languages used in the city, which are also the top 10 languages requested by respondents at OATH's Hearings Division.
- OATH secures translation vendors with 2-year contracts to ensure continuity of service.
- OATH's primary vendor for document translation is a MWBE vendor, LM Language Services.
- OATH has created a centralized translation request process, the Office of Public Affairs and Communications, as its internal translation requestor. This office receives all requests from all units and divisions of the agency and works with the translation vendor to fulfill requests.
- OATH uses internal staff and volunteers to assess the quality of translations. In future years, OATH plans to create a directory to assist translators with common words or phrases used in the court context that can sometimes be misinterpreted or translated incorrectly. For instance, a translator may misinterpret "contest" for a game rather than "challenge" or "fight" when we use the phrase "contest a summons". "Hearing" can be mistaken for audible sense "to hear" rather than a legal proceeding. This does not happen often but a dictionary will help ensure accuracy while also streamlining the use of common terminology and their translations across all translated materials.

Digital Communication

- As the city's administrative law court, OATH does not actively maintain social media accounts.
- The OATH website has a built-in translation function. The website is written in plain language so that much of the website translations are accurate. An added benefit is that many of OATH's electronic forms are not in PDF format, but rather are HTML webpage-based forms that are processed through the City's 311 electronic routing system. These types of forms that are webpage-based can also be translated by pressing the "translate this page" button on the OATH website. Instructions to this effect are provided on pages containing these forms, stating the following:

Please note that the online form can be translated by using the "Translate This Page" black button on the top of the page. You can submit this form in the language you feel most comfortable using.

- All forms can be submitted into up to 250 languages and it will be translated by a

professional third-party vendor prior to it being assigned to the appropriate unit for processing.

- Any defense submitted in writing (either online with a One-Click Hearing, or by mail with a Hearing by Mail) can be submitted in up to 250 languages and it will be translated by a professional third-party vendor prior to it being assigned to the Remote Hearings Unit for consideration.
- OATH's Community Service online e-learning module is available in the top ten languages. Community Service is available in lieu of a penalty for cases covered by the Criminal Justice Reform Act.
- Digital communications utilize best practices established by our IT and Disability Service Facilitator. OATH is committed to ensuring its digital content is accessible to and usable by people with disabilities. We are continually improving the user experience for everyone and applying the relevant accessibility standards.

Emergency Communications

- As the City's administrative law court, OATH does not deliver direct services to New Yorkers during an emergency. However, respondents may need information from OATH regarding office closures, rescheduling of cases, missed hearings and other matters if the emergency is one that shuts down transportation, gov't offices, etc.
- In an emergency, the Emergency Management Liaison will work with the Language Access Coordinator (who is also the Deputy Commissioner for Public Affairs and Communications) to ensure that communications to the public during an emergency are clear, concise, in plain language and available in top languages.
- Communications are done primarily through website postings and through calls to our Interactive Voice Response (IVR) telephone number. When callers reach a live person, clerks provide information to LEP individuals during an emergency with the aid of the over the phone interpretation service it has contracted with. The OATH website is translatable and plain-language notices on the homepage page and other pages are posted during an emergency in the top ten (10) languages.
- During an emergency, IVR messages can be recorded for the first message people hear when they call the 1800 number. Using OATH Communications Office staff, OATH is able to record those messages in English, Spanish, Mandarin and Cantonese which are our top 3 foreign languages in our LEP population.
- OATH works with its translation vendor to get commonly used messages and phrases that may be needed during an emergency such as "The Office is Temporarily Closed" and "All hearings have been rescheduled" translated into the top 10 languages so that the Communications office has them for website

posting in the top ten languages.

- OATH will rely on translated messages from OEM and City Hall on emergency-specific responses or messages that those entities want agencies to disseminate on their behalf.
- OATH does not have social media accounts which it would need to account for during emergencies.

Use of Plain Language Guidelines and Standards

OATH's goal is to use plain language as much as possible. Before translating a document into another language, OATH continues its practice- started in 2010- of rewriting the document using plain language principles. It is the plain language version of the documents that will become commonplace and will be used as the basis for translated versions.

All of OATH's judges and Hearing Officers are trained in plain language speaking and writing. Our hearings are conducted using plain language, where applicable and our hearing decisions are written in plain language. This ensures that the 300,000+ decisions that go out each year to people who had received summonses are easy to understand and do not use legalese. The Public Affairs & Communications office is also trained in plain language. This office is headed by the Deputy Commissioner for Public Affairs and Communications, who is also the Language Access Coordinator for the agency. This office is responsible for creating all forms, brochures, notices, and informational materials that are consumed by the public.

VI. Resources Planning

OATH will always provide interpretation both over the phone and at its offices. OATH already provides interpretation at trials, hearings, Help Centers and with clerk staff at all of its adjudication divisions.

Resource Analysis and Planning

Using Current Agency Resources to Implement the Language Access Plan

Some parts of the initial OATH Language Access Plan could be afforded in its budget as one-time costs, including:

- Signage.
- Purchase of dual-handset phones, conference phones, or equivalent technology.
- Training of current clerks in the use of dual-handset phones and use of interpretation services.
- Re-writing of essential document(s) into plain language.
- Translation of document(s) into LEP languages.
- Preparation of a PowerPoint presentations for waiting room televisions.

Other parts of OATH's Language Access Plan, such as interpretation at hearings, involve ongoing costs which OATH includes in its budget annually.

Use of Citywide Resources

When possible, OATH will use citywide resources to help provide language access services at OATH. To learn about citywide resources (such as pre-printed language cards), OATH's Language Access Coordinator will be in contact with the Mayor's Office of Immigrant Affairs. That Office helps City agencies to get language services to the public and gives technical assistance to City agencies in providing language services.

Bi-Lingual Staff

OATH does not utilize bi-lingual staff for formal legal proceedings or Help Center sessions to protect the integrity of the interpretation and ensure impartial and neutral, accurate interpretation. OATH will use existing bilingual staff only on a limited, informal basis. OATH will allow bi-lingual staff to use their second language in the following circumstances, should the staff member choose or want to do so:

- During an emergency, IVR messages can be recorded for the first message people hear when they call the 1800 number. Using OATH Communications Office staff, OATH can record those messages in English, Spanish, Mandarin and Cantonese.
- Outreach events where general (not individual or case-specific) information is given out to the public.
- Informal discussions relating to MEND NYC (OATH's mediation program where members of the public mediate conflicts related to quality of life issues). These discussions explain simply what the program is about and asks whether the complainant is interested in participating in a mediation. The mediation will involve a professional interpretation service, typically over the phone.
- Security or front-line staff providing directional information such as where the restrooms are located or which counter to pay, check-in, etc.

Using Existing Contracts for Services or Training

The current interpretation, translation, sign language, requirements contracts will be used for interpretation services, data retrieval, and for collaborating with for staff trainings.

Language Service Vendor Contracts

As an independent administrative law court, it is important for OATH to maintain its impartiality in the decision-making process. By using third-party independent contractors, OATH ensures that all hearings and trials that require interpretation proceed fairly and are impartial and neutral and that all documents submitted that require translation are translated accurately and in a formal manner.

Each division (Trials, SEHD, Hearings Division, Clerk's Office, Help Center, Communications Office) secures their own services. This allows OATH to track usage and language need and population by division or case type.

OATH has the following contracts in place with a sum spend of \$3 Million for 1-, 2-or 3-year contracts:

Vendor Name	Means of procurement	Type of service provided	Languages Provided
Geneva Worldwide	Small purchase	Transcription services for OATH Appeals Unit	Up to 250 Languages
Geneva Worldwide	Small purchase	Transcription services for OATH Hearings Division-blanket order	Up to 250 Languages
LM Language Services	MWBE	Trials Transcription services	Up to 250 Languages
Accurate Communications	Small purchase	Sign language interpretation for SEHD	American Sign Language (ase), Deaf Interpreter (dfi)
LM Language Services	MWBE	Document translation-SEHD	Up to 250 Languages
Geneva Worldwide	Small purchase	Transcription services for General Counsel	Up to 250 Languages
Accurate Communications	MWBE	In-person interpretation 3-year bid for Trials	Arabic, Bengali, Cantonese, Mandarin, Korean, Haitian Creole, French, Urdu, Russian, Polish, Spanish, Hindi, Punjabi, Greek, Thai, Hebrew, Yiddish
LM Language Services	Small purchase	Back-up Telephonic Interpretation for Trials	Up to 250 Languages
Simulngua Inc	Small purchase	Back-up Telephonic Interpretation for Hearings	Up to 250 Languages
LM Language Services	MWBE	Document translation services	Up to 250 Languages
Lex Reporting Service	Small purchase	Blanket PO for court reporting & transcription	English, Spanish, Cantonese, Mandarin
Language Line Services	Task Order from DCAS master contract	Telephonic Interpretation Services for Hearings Div	Up to 250 Languages
Languagers Inc	Small purchase	Backup Sign Interpretation for Trials	American Sign Language (ase), Deaf Interpreter

			(dfi)
Language Line Services	Small purchase	Telephonic Interpretation Services for Trials Division	Up to 250 Languages
Accurate Communications	Small purchase	Sign Language Interpretation for Trials Division	American Sign Language (ase), Deaf Interpreter (dfi)
Geneva Worldwide	Negotiated acquisition	Transcription services -Legal and Medical	Up to 250 Languages
Language Line Services	Task Order from DCAS master contract	Telephonic Interpretation Services for SEHD	Up to 250 Languages
Voiance Language Services	Small purchase	Backup telephonic interpretation services	Up to 250 Languages
Accurate Communications	Small purchase	Sign language interpretation for Hearings Division	American Sign Language (ase), Deaf Interpreter (dfi)
Accurate Communications	Small purchase	Sign Language Interpretation Services contract Hearings	American Sign Language (ase), Deaf Interpreter (dfi)
Accurate Communications	Small purchase	Backup in-person interpretation services	Up to 250 Languages

Partnerships with CBOs

OATH partners with CBOs in its effort to reach unique constituents, including culturally and linguistically diverse populations. While OATH does not provide funding or maintain contracts with CBOs, OATH provides some CBOs with services by helping to connect their constituencies to our services and resources, including information about the OATH hearing process and what they should do if they receive a summons from a city agency.

OATH tracks its events with all its partners and reports its numbers of events and number of constituents assisted in an internal annual report. Currently OATH has ongoing relationships and rolling events in the community or at CBO offices with the following organizations:

- Asian-American Federation (Rolling)
- National Supermarket Association (2nd time upcoming)
- Federation of Italian-American Organizations of Brooklyn (Rolling)
- Staten Island Chamber of Commerce (Rolling)
- Staten Island Economic Development Corp. (Recent and annually)
- United Bodegas of America (upcoming)
- Staten Island Gateway Rotary Club (Recent)

- Richmond Avenue Merchants Association (Recent)
- Asian Community Center in Sunset Park (Recent)
- JCC Brooklyn South Williamsburg (Recent)
- United Jewish Organizations of Williamsburg and North Brooklyn (Recent)
- Sunnyside Shines BID (Recent)
- Homecrest Community Services (Recent and Rolling)
- United Chinese Association of Brooklyn (Recent)
- NIA Community Services Network of Brooklyn (Recent)
- Chinese-American Planning Council (CPC) (Recent)
- Parent-Child Relationship Association (Recent)
- Queens Chamber of Commerce (Regular and Upcoming)

Outreach and Public Awareness

Ethnic Media and Advertising

OATH does not have a media, advertising or PSA budget. OATH does, however, engage ethnic media through its Public Relations activities. OATH partners with elected officials and civic organizations when it holds outreach events in the community. OATH relies on these groups and offices to advise as to the constituency they are trying to target with the event. Ethnic media receive press releases in the languages of the service population of the event. For example, when OATH is in Harlem or Inwood, the press release and event flyers that are disseminated would be in Spanish. When the event is in Flushing, Queens, the materials would be translated into Chinese. OATH also provides translation of its outreach events when requested by our partners or attendees in advance.

Interpreters at Public Outreach Events

As stated above, OATH conducts many dozens of outreach events each year in communities around the City or over video conference as was done in 2020 during the pandemic. When OATH does outreach for these events in foreign languages, it will have live interpreters present at the events that speak in the language that the flyers or website postings were translated into. This provides comprehensive, end to end interpretation for OATH outreach activities. OATH will continue to provide interpreters at public events with diverse populations and have our promotional materials for those events translated into the targeted languages so that residents feel welcomed to join us at our events and can get as much out of the events as those who come who are native English speakers. CBO staff often volunteer to provide translation at joint-sponsored outreach events.

VII. Training

Training on OATH's Language Access Plan

OATH staff who have regular contact with LEP persons receive training on OATH's Language Access Plan. This staff includes OATH Judicial Hearing Officers, Administrative Law Judges, Special Education Impartial Hearings Officers, Clerks, Procedural Justice Coordinators at the Help Center, and Security Staff. The training is on-the-job training, training by Memo, online training or classroom training depending

on the employee's role.

- Language Access Plan information is incorporated into new employee orientation.
- Language Access training includes information on the following topics:
 - OATH's legal obligation to provide language assistance.
 - A review of when OATH provides language assistance.
 - A review of their role in providing language assistance.
 - Tips and best practices for working with interpreters.
 - Who to contact at OATH if they have questions about language access issues.

The Language Access Coordinator meets with managers to explain the Language Access Plan and to explain their roles in implementing the plan and in training staff. The following are substantive, individual trainings provided by OATH:

Phones and Conference Phones for Interpretation

Use of dual-handset phones, speaker phones, conference phones:

- Hearing officers and Administrative Law Judges and Clerks have received on-the-job training in using phone interpretation services and conference phones and working with CourtCall to patch in interpreters to hearings conducted over the phone.
- This training occurs during a two-week intensive "New Judge/Hearing Officer" training for new ALJS and Judicial Hearing Officers which takes place twice a year. This intensive in-person training is administered by [OATH's Administrative Judicial Institute \(AJI\)](#).
- This training occurs at orientation for employees at the Clerk's Office staff and for Help Center staff.

Plain Language Decision Writing

OATH trains all adjudicators on judicial decision writing and plain language decision writing. All decisions issued by OATH divisions are issued in writing. Because respondents receive their decisions in writing, it is imperative that the decisions be in plain language so that the respondent understands why the adjudicator reached the decision that they did, in their case. This advances OATH's goal of being an accessible court. It also ensures that respondents, when found in violation of a rule or law, understand what the rule or law states, and why their defense did not meet the criteria for dismissal. Receiving a well-written, plain language decision may change a respondent's future behavior because they are better able to understand why their behavior was a violation of a rule or law and consequently, they may choose not to repeat that behavior.

Cultural Competency Training

Cultural competency training is training to increase awareness about and sensitivity to diversity and cultural differences. OATH's Administrative Judicial Training Institute (AJI) provides cultural competency training to Judicial Hearing Officers and Administrative Law Judges and customer service staff.

Communication for People with Disabilities in the Judicial Process Training

OATH's Administrative Judicial Training Institute (AJI) offers a two-hour Continuing Legal Education (CLE) class for its Judicial Hearing Officers and Administrative Laws Judges and other legal personal entitled *Effective and Accessible Communication for People with Disabilities in the Judicial Process*. The course provides tips for fostering open discussions about individual communication needs and explains practical communication methods tailored to individuals with different disabilities, along with the available auxiliary aids and accommodations. Participants learn valuable resources to ensure that their communications are accessible to all parties involved in order to contribute to a more inclusive judicial process.

VIII. Continuous Improvement Planning

Ensuring Quality of Language Access Services

OATH will ensure the quality of its language access services by doing the following:

- OATH will aim to conduct periodic surveys of the LEP persons and of OATH staff who use OATH's interpretation and translation services to determine quality language access services.
 - Prior to the pandemic, OATH used to survey respondents who appeared for hearings in-person on an annual basis. Currently, 94% of all hearings are now done over the phone, making surveying respondents difficult when the Judicial Hearing Officer is the only person on the phone with the respondent and surveying respondents is outside of the job requirements of OATH adjudicators.
 - OATH will consider emailing a survey to respondents who have used interpretation services at hearings or who have requested decision be translated in other languages in future years.
- To ensure accuracy and professionalism of contracted service providers, OATH will continue to survey staff and remind them to submit reports of instances where interpretation or translation vendor did not perform to the user's satisfaction. The reports detail the issue that was observed, how quickly the vendor worked to rectify the issue and whether there was a cost incurred by the agency. This information is shared with the vendor once it is received by the Language Access Coordinator.

Maintaining Records of the Language Services OATH Provides

OATH will maintain records of the language services it provides by doing the following:

- Obtain statistics from the interpretation and translation service providers that indicate how many interpretations were done at each OATH location, at each OATH unit, what languages were requested and in what volume.
- Keep file copies of all translated documents.

- Document any formal classroom training provided and keeping file copies of training materials.
- Keep copies of the results of any surveys it conducts in connection with services provided to LEP persons.
- Maintain record of complaints from OATH employees regarding quality of services provided by our contracted vendors so we can make informed decisions on contesting billing and vendor contract renewals, when appropriate.

Ensuring Compliance with Local Law 30

OATH will ensure compliance with Local Law 30 in the following ways:

- Hearing Officers, ALJs and Clerks will be trained in the use of language assistance services.
- OATH will get monthly reports from the interpretation contractor, and from OATH staff, to ensure that interpretation services are being used, and understand how they are being used.
- The Language Access Coordinator will regularly communicate and work with OATH staff to ensure they are implementing the Language Access Plan.
- The OATH Language Access Coordinator will work with other OATH executive staff as needed, to continue deciding issues relevant to compliance- including deciding which newly created documents should be translated and in what order and into which languages.
- OATH will review the Language Access Plan at least once every year.

Language Access Complaints

Process for LEPs to File Complaints Related to Language Access Services

OATH has signage in its hearing centers that tells respondents that they have the right to complain about the interpretation services provided by OATH. They are instructed to call 311 with their complaint or they can visit the OATH website and file a complaint online. The complaint would be routed to the Deputy Commissioner for Public Affairs, who is also the agency's Language Access Coordinator. She would send the complaint to document translation vendor if the complaint was in another language. She would investigate the complaint and then answer the correspondence directing it to the complainant after investigating the complaint. If the original complaint was in another language, she would have the response translated by our vendor before sending the translated response to the complainant.

How Complaints are Handled by OATH for Service Disruption by Vendor and Quality Assurance

OATH submits complaints to vendors if we encounter quality control problems and we respectfully request plans of action from them if the problem is persistent. In regard to over the phone translation, OATH has a secondary contract that can be used when the problem is not solved to our satisfaction by our primary vendor. There is a protocol for using the second vendor, including documenting instances and making formal complaints with the primary service provider and giving them the opportunity to resolve

the issue.

In terms of quality assurance for document translation, OATH has translated documents reviewed by employees who are fluent in the languages we are getting forms or outreach materials translated into.

Where do the Public and OATH Employees Document Complaints Regarding Language Services

All complaints are routed to, and handled by, the agency's Language Access Coordinator who may work in conjunction with other OATH leaders to ensure an issue is thoroughly investigated and responded to in a timely manner. Should a systemic problem be revealed, the Language Access Coordinator would work with the Commissioner and other Deputy Commissioners to institute changes to appropriately address the problem. For example, if a contract should lapse without renewal, or service be cut off due to lack of payment, the Deputy Commissioner of the unit responsible for submitting the requisition to the Procurement Unit would work with the Administration team to work with the vendor to rectify the payment issue in expeditious fashion.

IX. Goals and Actions Planning

Persons at OATH Involved in Implementing the Language Access Plan

OATH's Language Access Coordinator is Marisa Senigo, Deputy Commissioner for Public Affairs & Communications. She is the person who implements the Language Access Plan.

The responsibilities of the Language Access Coordinator include:

- Achieve the specific goals of the Initial and subsequent LAPs.
- Work on an ongoing basis with the senior staff at OATH's divisions to achieve those goals and ensure that the public has access to translated materials and interpretation services.
- Submit an "Annual Report" on the agency's language access efforts and accomplishments to the Mayor's Office of Operations (MOO) and the Mayor's Office of Immigrant Affairs (MOIA).
- Act as the point person for the Mayor's Office on language access evaluation programs, such as Language Access Secret Shopper (LASS) evaluations.
- Act as the point person for the public, for LEP persons and for people with disabilities.
- Work with the Director of the Administrative Judicial Institute (AJI) at OATH, and also with other OATH executive staff as needed, in connection to the training of Hearing Officers and judges in order to achieve the goals of the Language Access Plan.

- Maintain records of the language services provided by OATH including maintaining copies of all translated document submissions, brochures, applications and forms.
- Conduct an annual review of the Language Access Plan.
- Investigate and respond to any direct correspondence or correspondence to 311 in which a constituent files a complaint about OATH’s language accessibility or interpretation services.
- Alert the General Counsel’s office, and also other OATH executive staff as needed, of any significant problems that arise regarding the Language Access Plan.
- Ensure that communications (event flyers, press releases, etc.) are available and disseminated in applicable languages according to service area.

Goals for Next Reporting Period

Below is a table outlining the agencies goals over the period of this plan (next 3 years).

Language Access Goal	Responsible Staff	Milestones	Deadline
<p>Making it Easier to Understand How to Respond to Summonses:</p> <p>Translate Universal Summons’ backs (where information on how to respond to the summons is) into top 10 languages and post image of translated backs onto OATH website.</p> <p>Invite enforcement agencies who use those summonses to link to OATH website to provide visitors to their websites, the same information regarding their summonses and how to respond.</p>	<p>Marisa Senigo, Deputy Commissioner for Public Affairs & Communications</p>	<p>Send back of the Universal Summons to translation vendor to be translated into top ten languages.</p> <p>Quality control for accuracy with assistance from OATH employee volunteers and through MOIA, if necessary.</p> <p>Post to website</p>	<p>July 15, 2024</p> <p>August 30, 2024</p> <p>November 1, 2024</p>

<p>Translating Appeal Decisions without requiring a request:</p> <p>Set up a process by which the Appeals Unit sends out the official English version of the Appeal Decision and the Public Affairs Unit is notified and sends a translated version of the appeal decision in the language used by the respondent when the respondent submitted their original appeal application in a different language or on a translated form.</p>	<p>Marisa Senigo, Deputy Commissioner for Public Affairs & Communications</p> <p>Maggie Nieves, Public Affairs Associate</p> <p>Mavis Szeto, Creative Services Director</p> <p>Peter Schulman, Deputy Commissioner for Appeals</p> <p>Tom Southwick, Assistant Commissioner for Appeals</p>	<ol style="list-style-type: none"> 1. Set up internal protocol at Public Affairs Unit to track Appeals submitted in other languages that Appeals Unit sends to PA to get translated. 2. Meet with Appeals Unit and Create inter-unit protocol with Public Affairs to notify when decision goes out in English and send decision out for translation into original language. 3. Meet with GC to create disclaimer language about official version of decision being English (for Article 78 purposes). 4. Begin to implement process. 5. Track the following data: <ul style="list-style-type: none"> • numbers of appeals translated without request • cost per translation • language 	<p>October 1, 2024</p> <p>October 15, 2024</p> <p>November 1, 2024</p> <p>January 1, 2025</p> <p>Ongoing</p>
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<p>Assessing and Evaluating Our Services and Progress:</p> <p>Over the next reporting period, OATH will create a survey that can be emailed to respondents who have requested that their hearing decision be translated in another year.</p> <p>The survey will seek to evaluate the translation services they received and their satisfaction with their overall hearing experience as an LEP respondent.</p>	<p>Marisa Senigo, Deputy Commissioner for Public Affairs & Communications</p>	<ol style="list-style-type: none"> 1. Create Survey 2. Distribute Survey for 3 months to respondents 3. Collect Survey Responses for 3 months 4. Compile Results 5. Issue Report and Recommendations 	<p>January 2025</p> <p>February 15, 2025</p> <p>June 1, 2025</p> <p>July 15, 2025</p> <p>October 15, 2025</p>
<p>Assessing and Evaluating Our Services and Progress:</p> <p>Over the second reporting cycle, OATH will create a survey that can be emailed to respondents who use our Hearings by Phone hearing method and used interpretation services at the hearing, shortly after their hearing.</p> <p>The survey will seek to evaluate the interpretation services they received and their satisfaction with their overall hearing experience as an LEP respondent.</p>	<p>Marisa Senigo, Deputy Commissioner for Public Affairs & Communications</p>	<ol style="list-style-type: none"> 1. Create Survey 2. Distribute Survey for 3 months to respondents 3. Collect Survey Responses for 3 months 4. Compile Results 5. Issue Report and Recommendations 	<p>January 2026</p> <p>February 15, 2026</p> <p>June 1, 2026</p> <p>July 15, 2026</p> <p>October 15, 2026</p>
<p>Review Language Access Implementation Plan</p>	<p>Marisa Senigo, Deputy Commissioner for Public Affairs & Communications</p>	<p>Annually</p>	<p>February 1, 2025, 2026, 2027</p>

Contact OATH's Language Access Coordinator:

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Deputy Commissioner for Public Affairs & Communications

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