



LANGUAGE ACCESS IMPLEMENTATION PLAN

I. Agency Mission and Background

a. Mission

The Business Integrity Commission (BIC) is both a law enforcement and regulatory agency charged with oversight of the private carting industry, the businesses operating in the City's public wholesale markets, and the currently inactive shipboard gambling industry.

BIC issues licenses and registrations to applicants who meet the standards of integrity, honesty and good character pursuant to vigorous background investigations. Through regulation of these businesses and conducting criminal investigations, BIC carries out its mandate to eliminate organized crime and other forms of corruption and criminality from the industries it regulates.

b. Direct Services

BIC accepts and makes determinations on applications for trade waste and market licenses and registrations from the businesses it regulates as well as applications for photo identification cards for employees working for businesses in the public wholesale markets.

II. Agency Language Access Goals

a. Language Access Initiatives Already Underway

BIC has 17 employees, representing 7 different languages, who have volunteered to translate and/or interpret when needed. The 7 languages represented are: Arabic, Akan- Twi dialect, Chinese – Mandarin and Cantonese, Hebrew, Russian, Spanish, and Urdu. These employees are registered with the Language Bank.

BIC has a "Free Interpretation Service Available" poster in the reception area, which is the agency walk-in area, and in the Licensing unit, to inform applicants that language translation is available. There are also small "I speak" language cards at the sign-in counter in the reception area and a translated welcome sign in 10 languages.

The Language Access Coordinator is responsible for monitoring the effectiveness of the plan by evaluating on a regular basis all requests for language assistance. Staff documents all LEP individuals requesting assistance; this information is inputted to a database which enables the agency to generate reports on types of language, frequency and documents needing interpretation or

translation. The Language Access Coordinator submits reports to the Chief Operating Officer for further review and recommendations. In addition, BIC will continue to provide multilingual information to the public through the informational brochure and inquiry response staff.

b. BIC's Language Access Plan Goals

BIC's goal is to provide meaningful access and assistance to all applicants, licensees, and registrants including LEP individuals. BIC endeavors to ensure quality interpretation services and translation of materials through the use of bilingual staff employees and contract vendors.

BIC will continue to provide annual staff training on the language access policy and procedures and review the LEP customer population for frequency of assistance and additional language needs. New employees will be given a LEP policies and procedures training session and reminder policy and procedures emails are sent to all staff periodically throughout the year.

III. LEP Population Assessment

BIC currently regulates over 2,000 actively operating licensees and registrants. Anecdotally, BIC, on rare occasions, receives requests for Cantonese, Mandarin and Spanish translation assistance. Data from 311 language line calls indicates that the top languages for BIC are Spanish, Cantonese, and Mandarin.

a. Federal Department of Justice "Four-Factor Analysis"

Through the agency's one walk-in center and the complaint lines, BIC has conducted an assessment of the LEP population employing the federal Four-Factor Analysis. BIC has identified the LEP populations most frequenting our walk-in center. These languages have been identified as Mandarin, Cantonese and Spanish. The agency has determined that interpretation services are needed 8-9 times a month for these languages. BIC has identified LEPs requiring assistance in cases regarding trade waste applications specifically class 1 (landscapers) and class 2 (Construction and Demolition). Services and/or programs with high priority are the focus of BIC's Language Access Plan. BIC has a bank of volunteer employees who are available for LEP assistance.

IV. Implementation Plan Logistics

a. Timetable

BIC's implementation timetable is as follows, taking into consideration budgetary constraints:

<i>Phase I: LEP Population Update</i>	<u>Completion Date</u>
• Annual review of languages of the LEP population to see if there are additional languages that need assistance	February 2013
<i>Phase II: Staff Training</i>	
• Annual training review session for staff on how to handle	March 2013

LEP population needs and language assistance policies

Phase III: Translation of Languages Most Needed for Interpretation

- Annual review of how often BIC customers need assistance February 2013

in other languages

b. Milestones

- Translation of the application instruction sheets
- Translation of BIC's informational brochure, "Frequently Asked Questions"
- Posting of the translated application instructions sheets and informational brochure on the website
- Trained staff on BIC's Language Access Plan
- Contracted with interpreter vendor: Language Line, to provide immediate service via phone for LEP customers
- Community outreach through survey on website
- Annual review of how often BIC customers need assistance in other languages
- Annual staff training on how to handle LEP population needs and BIC's Language Access Plan
- Conducted an assessment of further translation needs into other languages regarding the brochure

c. Key BIC Staff Involved In Implementation of the Language Access Plan

The Language Access Coordinator will continue to update the LEP population on a regular basis and identify the language needs of LEP persons who contact the agency through the walk-in center and telephone inquires through the Licensing Unit and agency's main telephone line. The Language Access Coordinator will also update and identify the languages in the application instruction sheets that need translation.

The Complaint Coordinator will continue to assist in updating the LEP population and identify the language needs of LEP persons who contact the agency's complaint lines.

The Language Access Coordinator will continue to work with agency personnel to gather data on the LEP population and language needs, and ensure that BIC personnel continue to be trained regarding the agency's Language Access Plan. The Language Access Coordinator will also research interpretation services, to replace expiring contracts with current vendors, using DCAS' citywide contract for Language Services vendors, to supplement the agency's bilingual staff, and for written, in-person and phone translation needs. The Language Access Coordinator will continue to conduct re-assessments of the LEP population and language needs.

The Director of MIS will continue to be responsible for posting translated materials to the website.

V. Service Provision Plan

a. Interpretation Services

Most of BIC's customer service population contacts the agency through the Licensing unit's walk-in center and over the phone. BIC's bilingual staff currently handles interpretation needs. At present, BIC's interpretation needs are for Chinese (both in Mandarin and Cantonese) and Spanish. There have not been any other language needs identified. BIC currently has access to the vendor Language Line to supplement interpretation needs for languages other than Chinese and Spanish, if so needed. At the same time, BIC will continue to monitor and document language interpretation needs so BIC can identify any additional primary languages of customers. On average, BIC receives request for LEP assistance 8-9 times per month. This includes all three languages identified.

b. Translation of Written Materials

The essential documents for regulated businesses are the instruction sheets and application forms for private carter and market licenses and regulations. As part of BIC's implementation plan, the instruction sheets to applications have been translated. BIC's website can also be translated into 34 different languages. The agency has access to the vendor Language Line to translate any additional essential documents.

Employees listed in the language bank are utilized to review translated documents for efficiency. BIC is able to determine by the answers provided on the application forms whether the information has been properly translated or interpreted or both. The answers on the applications are specific.

BIC is committed to plain language usage and will continue to work with the Mayor's Office of Adult Education to ensure that documents available for distribution to the public meet the plain language standards.

c. Signage at Public Centers

Posters informing members of the public of the availability of free language assistance are posted in BIC's reception area and in the Licensing unit's processing office. Small language cards are displayed at the sign-in counter in the reception area. A welcome sign translated into 10 different languages is posted in BIC's reception area. Since no person is allowed to pass the reception area without escort or assistance, no directional signage is necessary.

d. Outreach and Public Awareness of BIC's Language Assistance Services

BIC conducts community outreach on the agency's' language assistance services by providing a survey on the website and to individuals through BIC's walk-in center for the public to evaluate the effectiveness of BIC's language assistance to the LEP population.

VI. Training

BIC conducts a yearly staff training session on LEP policies and procedures and on the agency's Language Access Implementation Plan. New employees are given a LEP policies and procedures training session and reminder policy and procedures emails are sent to all staff periodically throughout the year.

All employees are referenced to the Language Bank and given copies of Executive Order 120. Employees assigned to the license center's walk-in area and complaint line personnel are the key employees who receive additional language services contact information. All employees have access to the tools to identify a customer's primary language, are trained in how to request language services, how to document LEP assistance and, if needed, the use of telephonic interpreters.

BIC's on-site employees who have volunteered their bilingual skills are skilled in how to ask questions to identify issues needing answers or clarification, how to provide the correct information, and on interpersonal skills when interacting with LEP individuals

VII. Record Keeping and Evaluation

a. Ensuring the Quality of Language Assistance Services

The Language Access Coordinator provides feedback on the quality of the agency's language assistance services. The Language Access Coordinator can readily review whether or not LEP applicants fill out the applications properly, thus attesting to the quality of the translation assistance. Similarly, the Complaint Coordinator working with the enforcement staff can identify whether or not a LEP complainant's issues were properly translated to document the nature of the complaint for its resolution. Further, the database is used to run reports on the number of LEP assistance that was provided and the success of the interpretation service.

b. Maintaining Records of Language Services Provided

BIC has a LEP request form available for whenever translation/interpretation services are needed. The Language Coordinator reviews the LEP request form on a regular basis to monitor the language service needs and volume, and reports on emerging or changing trends and needs. A database captures all requests and provides reports for further review of language needs, satisfactory interpretation/translation and BIC services accessed. BIC reviews these reports and updates language access needs accordingly.

c. Compliance with Executive Order 120

BIC will continue to ensure compliance with Executive Order 120 through the execution of the activities outlined in the agency's Language Implementation Plan.

VIII. Resource Analysis and Planning

BIC utilizes the Language Bank that is updated on a regular basis. On-site bilingual employees provide translation and interpretation services when needed. Contract vendors are available to supplement interpretation and translation needs.

BIC will continue to avail itself of any citywide resources as appropriate such as the poster notifying the public of the availability of interpretation services, the "I speak cards," and the Mayor's Office of Adult Education. In addition, the Language Access Coordinator will research interpretation services, to replace expiring contracts with current vendors, using DCAS' citywide contract for Language Services vendors, to supplement the agency's bilingual staff, and for written, in-person and phone translation needs.