

COMMITTEE ON IMMIGRATION

1

CITY COUNCIL
CITY OF NEW YORK

----- X

TRANSCRIPT OF THE MINUTES

Of the

COMMITTEE ON IMMIGRATION

----- X

September 24, 2024

Start: 1:31 p.m.

Recess: 5:20 p.m.

HELD AT: COUNCIL CHAMBERS - CITY HALL

B E F O R E: Alexa Avilés, Chairperson

COUNCIL MEMBERS:

Erik D. Bottcher

Shahana Hanif

Rita C. Joseph

OTHER COUNCIL MEMBERS ATTENDING:

Yusef Salaam

A P P E A R A N C E S

Kenneth Lo, Senior Advisor on Language Access at the Mayor's Office of Immigrant Affairs

Young Kwon, Senior Manager for Language Access at the Mayor's Office of Immigrant Affairs

Lorena Lucero, Chief Policy Advisor at the Mayor's Office of Immigrant Affairs

Daniel Steinberg, Director at the Mayor's Office of Operations

Francisco Navarro, Senior Policy Advisor at the Mayor's Office of Operations

Lloyd Feng, Data Policy Coordinator for the Invisible No More Campaign at the Coalition for Asian American Children and Families

Kelly Cho, Community Outreach Associate at the Korean American Family Service Center

Adama Bah, Executive Director and Founder of Afrikana

Riva Shang, Coordinator for Small Business Support Programs at the Asian American Federation

Jorge Paz-Reyes, Community Organizer at Mixteca Organization

Ennery Valbrun, Mixteca, with interpreter

A P P E A R A N C E S (CONTINUED)

Ana Juarez, Mixteca, testimony read by
interpreter

Abigail Dorcin, Organizing Manager at La Colmena

Miral Abbas, Health Partnerships Coordinator at
the Coalition for Aiding American Children and
Families

2 SERGEANT-AT-ARMS: This is a microphone
3 check for the Committee on Immigration. Today's date
4 is September 24, 2024, located in the Chambers.
5 Recording is done by Rocco Mesiti.

6 SERGEANT-AT-ARMS: Good afternoon and
7 welcome to today's New York City Council hearing for
8 the Committee on Immigration.

9 At this time, please silence all cell
10 phones and electronic devices to minimize disruptions
11 throughout the hearing.

12 If you have testimony you wish to submit
13 for the record, you may do so via email at
14 testimony@council.nyc.gov. Once again, that is
15 testimony@council.nyc.gov.

16 If you wish to testify, please fill out a
17 witness slip in the rear of the room with the
18 Sergeant-at-Arms.

19 At any time throughout the hearing,
20 please do not approach the dais.

21 Thank you for your cooperation.

22 INTERPRETER: (SPEAKING FOREIGN LANGUAGE)

23 INTERPRETER: (SPEAKING FOREIGN LANGUAGE)

24 INTERPRETER: (SPEAKING FOREIGN LANGUAGE)

25 INTERPRETER: (SPEAKING FOREIGN LANGUAGE)

1 COMMITTEE ON IMMIGRATION

5

2 INTERPRETER: (SPEAKING FOREIGN LANGUAGE)

3 INTERPRETER: (SPEAKING FOREIGN LANGUAGE)

4 SERGEANT-AT-ARMS: Chair, we are ready to
5 begin.

6 COUNCIL MEMBER AVILÉS: [GAVEL] This
7 meeting is being called to order. Good afternoon,
8 everyone. I am Council Member Alexa Avilés, Chair of
9 the Committee on Immigration. Thank you all for
10 joining us today, and thank you to the interpreters
11 who opened us.

12 Today, we will be examining the immensely
13 important issue of language access, specifically
14 assessing the Mayoral Administration's compliance
15 with Local Law 30 of 2017. I'd like to begin by
16 thanking the representatives from the Administration
17 who are here today, members of the public, and my
18 Committee Colleagues who, we have someone on Zoom,
19 Council Member, we are joined by Council Member Hanif
20 on Zoom.

21 I'd also like to flag that we have
22 consecutive, as you have just been made aware,
23 interpretation available to the public to listen to
24 today's hearing in Spanish, Mandarin, Haitian Creole,
25 Wolof, French, and Arabic.

2 New York City is one of the most
3 linguistically diverse cities in the world. The
4 Endangered Language Alliance has mapped more than 700
5 languages spoken in this area, and a walk down any
6 busy street in our city can attest to this linguistic
7 richness. Languages from immigrants across the world
8 and from Indigenous tribes should be equitably
9 supported and respected, ensuring that every resident
10 of New York, no matter their preferred language, can
11 access City services is crucial, and today we'll look
12 closely at the City's Language Access Law, Local Law
13 30 of 2017, that was designed to ensure just that.

14 In 2017, Local Law 30 was enacted by the
15 City Council and requires City agencies to provide
16 services for all designated City languages. The law
17 mandates that language access services must, at a
18 minimum, include providing translation of the
19 documents most commonly distributed to the public,
20 provide interpretation services, and post signage
21 about the availability of free interpretation
22 services in all the citywide languages. Under this
23 law, there are 10 designated citywide languages based
24 on the U.S. Census data and the New York City
25 Department of Education's data. These languages

2 include Spanish, Russian, Bengali, Haitian Creole,
3 Korean, Arabic, Urdu, French, Polish, and Chinese. Of
4 note, the Census Bureau includes all dialects of
5 Chinese, actually, I'm not sure this is all, but
6 Mandarin, Cantonese, Taiwanese, Fujianese, and Hakka
7 under the umbrella term of Chinese. Local Law 30 also
8 contemplates the Administration will periodically
9 update this list based on changes to the Census and
10 the New York City Department of Education data. We
11 look forward to learning more about how the
12 administration is complying with the Law assessments
13 by the Administration regarding this list.

14 The law also requires agencies to
15 consider providing services in languages beyond these
16 designations when there is sufficient need among
17 their service population. Local Law 30 mandates
18 agencies to develop language access implementation
19 plans and appoint a language access coordinator.
20 Under the Mayor's Office of Immigrant Affairs, the
21 Office of Language Services Coordinator is charged
22 with providing language access assistance to
23 agencies, and we look forward to learning more from
24 the Mayor's Office of Immigrant Affairs and the

2 Mayor's Office of Operations about their
3 responsibilities and how they are meeting them.

4 Unfortunately, since the law has been in
5 effect, multiple oversight hearings on or related to
6 this law have revealed noncompliance for multiple
7 agencies. In particular, the COVID-19 pandemic
8 revealed the challenges with quickly sharing
9 accessible and accurate information in languages
10 other than English, and a hearing earlier this year
11 on the experiences of newly arrived Black migrants
12 highlighted the massive gaps in providing City
13 services in language such as Haitian Creole, French,
14 Arabic, Fulani, and Wolof.

15 The most recent reporting from the
16 Mayor's Office on Immigrant Affairs on Local Law 30
17 highlights some notable City agency successes, but
18 reporting remains unclear, and we want further
19 explanation regarding how the Mayor's Office on
20 Immigrant Affairs responds to noncompliance.
21 According to the data from this year's Language
22 Access Secret Shopper Program, a City-run program
23 which assesses how well New York City service centers
24 provide services to customers in language other than
25 English, more than half of the service centers

2 investigated were not compliant with Local Law 30.

3 The consequences of not offering services in

4 someone's preferred language can be severe, and in

5 our linguistically rich city, it would be

6 disappointing if our language access infrastructure

7 were not adequately supporting speakers of languages

8 other than English. We look forward to learning more

9 today from the Mayor's Office of Immigrant Affairs,

10 and again, the Mayor's Office of Operations, on how

11 we can improve Local Law 30 compliance for our City's

12 agencies to ensure that the access to City services

13 is, in fact, equitable.

14 The Committee on Immigration will hear

15 the following legislation, Introduction 215,

16 sponsored by Council Member Hanif, which would

17 require the creation of an Office of Translation and

18 Interpretation within the Mayor's Office of Immigrant

19 Affairs. I will be sharing Council Member Hanif's

20 testimony and look forward to hearing more about the

21 bill and the Administration's response to the current

22 structures and resources available for language

23 access.

24 I would like to thank all the Committee

25 Staff for their work in this hearing, including

2 Nicole Catá, Legislative Counsel; Rebecca Barilla,
3 Policy Analyst; Florentine Kabore, Unit Head, and
4 lastly, I would like to thank my Staff, Chief-of-
5 Staff Edward Cerna, and Legislative and Budget
6 Director Christina Bottego, and Legislative Fellow
7 Amarachi Ngadi, and everyone for working in the
8 background to make this hearing run smoothly.

9 We have also been joined by Council
10 Member Salaam on Zoom. Thank you, Council Member, for
11 being here. I will now read on behalf of Council
12 Member Hanif, who could not be here for medical
13 reasons, her opening statement about her bill, and
14 then I'll turn it over to Counsel to administer the
15 oath.

16 I should change my voice, right, to shift
17 it up. So this is Council Member Hanif's statement.

18 Good afternoon. She is Council Member
19 Shahana Hanif, and she regrets that she is dealing
20 with some health issues and unable to join in person
21 today. She thanks me, and I thank her back for
22 holding this important hearing and reading this
23 statement on her behalf of Intro. 215. She'd also
24 like to thank the 18 Council Members who have signed
25 onto this bill, including co-prime sponsors, Council

2 Members De La Rosa, Marte, Brannan, Narcisse, Brewer,
3 Ung, and Gutiérrez. As the Committee report lays out,
4 the City's insufficient language access
5 infrastructure has caused City agencies to fail to
6 meet the requirements for translation and
7 interpretation set out by Local Law 30 of 2017. Due
8 to a lack of sufficient intergovernmental resources,
9 City agencies issue large language service contracts
10 to out-of-state companies who produce subpar work at
11 high costs. The consequences are serious. During the
12 pandemic, the City was often unable to communicate
13 time-sensitive information to our immigrant
14 communities regarding the vaccine, safety protocols,
15 and changing policies. Additionally, as the number of
16 new arrivals has increased over the past two years,
17 language access has been a consistent barrier to
18 connecting folks to essential services. Intro. 215
19 seeks to mitigate this issue by establishing an
20 Office of Translation and Interpretation within the
21 Mayor's Office of Immigrant Affairs. This would
22 consolidate the ongoing and often overlapping work of
23 the Language Access Team, Language Services Team, and
24 Office of Language Services Coordinator into one
25 streamlined and strengthened entity. As this office

2 scales up, it would directly fulfill more and more
3 agency requests for document translation and live
4 interpretation at events, allowing agencies to wean
5 off of external contracts. This would increase the
6 quality of the work, decrease wasteful spending, and
7 create jobs for New Yorkers with language skills. The
8 office would also play a parallel role to the State
9 Office of Language Access, overseeing local authority
10 implementation and providing guidance and support
11 across City agencies. The office could additionally
12 serve as the City's main support entity for the
13 Community Interpreter Bank and the three worker-owned
14 Language Service Cooperatives for Languages of
15 Limited Diffusion that this Council has funded and is
16 helping to launch. Thank you for your time, and I
17 look forward to the testimony from the Administration
18 and the public.

19 With that, I turn it over to Committee
20 Counsel to administer the oath.

21 COMMITTEE COUNSEL CATÁ: Thank you, Chair
22 Avilés. We will now hear testimony from the
23 Administration. We'll hear from Kenneth Lo, Lorena
24 Lucero, Young Kwon, Daniel Steinberg, and Francisco
25 Navarro.

2 Before we begin, I will administer the
3 affirmation. Panelists, please raise your right hand.
4 Do you affirm to tell the truth, the whole truth, and
5 nothing but the truth before this Committee and to
6 respond honestly to Council Member questions?

7 ADMINISTRATION: (INAUDIBLE)

8 COMMITTEE COUNSEL CATÁ: Thank you. You
9 may begin when ready.

10 SENIOR ADVISOR LO: Good afternoon. Thank
11 you for the opportunity to speak before this
12 Committee. Thank you to Chair Avilés and the Members
13 of the Committee on Immigration for the opportunity.
14 I do want to wish Council Member Hanif well, and I'm
15 sorry that she could not be with us today. She's been
16 a great advocate for language access.

17 My name is Kenneth Lo, and I currently
18 serve as Senior Advisor on Language Access at the
19 Mayor's Office of Immigrant Affairs, or MOIA. I'm
20 joined here today by my colleagues, Young Kwon, who
21 serves as Senior Manager for Language Access, and
22 Lorena Lucero, Chief Policy Advisor at MOIA. I am
23 also grateful to sit alongside Director Daniel
24 Steinberg and Senior Policy Advisor Francisco Navarro
25 from the Mayor's Office of Operations, who will be

2 available for questions and answers, and this is
3 going to be a shortened version of the testimony that
4 we will submit in the interest of time, and we do
5 look forward to the broader conversation around Local
6 Law 30 and engaging all of the details that come with
7 it. One last note, again, I echo a thank you to the
8 interpreters for helping to support today.

9 Local Law 30 has been a remarkably
10 valuable tool since it was enacted over seven years
11 ago. It's of particular importance now, as more than
12 217,300 immigrants have arrived in New York City
13 since the spring of 2020. Our office has continued to
14 coordinate the citywide implementation process for
15 Local Law 30, and together the agencies have done
16 good work on improving their language access.

17 Our goals in this testimony, or
18 conversation, are threefold. First, we would like to
19 share how MOIA has approached language access since
20 the bill's enactment, and specifically how it has
21 guided the implementation of Local Law throughout the
22 city. Second, we would like to both highlight our
23 areas of progress and to share what we have learned
24 over the course of implementation, including ongoing
25 challenges and opportunities, including with Local

2 Law 30 itself. Finally, we would like to speak about
3 how MOIA looks to expand and deepen language access
4 as a tool that can serve all New Yorkers, regardless
5 of where they come from.

6 As the Chair mentioned, the last
7 oversight hearing dedicated to Local Law 30 was a
8 while ago. It was actually in 2018. In 2017, City
9 Council passed Local Law 30 unanimously. It codified
10 the Executive Order from 2008 into our City Charter
11 and Administrative Code and expanded the list of
12 designated citywide languages to 10. As the Chair
13 mentioned, this is a remarkably diverse city in terms
14 of language. We actually have the copy of Language
15 City right up here. It's a wonderful resource, and it
16 also goes to highlight how not only is New York City
17 diverse in terms of representing 10 percent of the
18 languages worldwide, but also explaining how, since
19 its very founding, New York City has been a place of
20 great diversity, and it's in the DNA, and it's
21 critical that New York City serves a city with the
22 appropriate infrastructure and appropriate effort to
23 make sure that New York City continues to be a place
24 that serves all of its residents in an equitable way.

2 When we talk about language access with
3 City staff, we do highlight the scale and diversity,
4 and the breadth of that diversity. Not only are 22
5 percent of New Yorkers considered to have limited
6 English, but in terms of scale, that would be roughly
7 the same size as the entire population of Queens or
8 Brooklyn, and then we also say, in national terms,
9 just LEP New York would be the fourth largest city in
10 the entire United States. We also have the largest
11 city government in the country, and in government,
12 communication is at the core of serving all New
13 Yorkers effectively.

14 But in this linguistically diverse city,
15 language is far more than just a means of
16 communication. It is also an integral part of
17 people's identity and heritage. So that's what drives
18 us at MOIA. We recognize that significant barriers
19 persist in accessing City services, and that language
20 access must be at the forefront of our efforts, not
21 as an afterthought. The following mantra has guided
22 MOIA in its oversight of Local Law 30, and across all
23 its efforts on language access, a multilingual city
24 requires a multilingual government.

2 As you know, Local Law 30 sets the
3 foundational obligations of New York City agencies to
4 build this multilingual government. The law
5 designates the 10 citywide languages. It requires
6 every covered agency, to designate a language access
7 coordinator, every agency must develop a language
8 access implementation plan, and deliver particular
9 services, as the Chair mentioned in her opening
10 remarks.

11 In terms of monitoring and oversight, the
12 City Charter identifies an Office of the Language
13 Services Coordinator within the Mayor's Office of
14 Operations that fulfills its duty in consultation
15 with the Mayor's Office of Immigrant Affairs. Since
16 Local Law 30, MOIA has taken the lead on language
17 access with support from operations, and we're happy
18 to discuss this relationship in a further
19 conversation.

20 Local Law 30 provides essential anchors
21 for MOIA's ongoing monitoring and oversight of
22 language access efforts. These anchors are primarily
23 the development of implementation plans and annual
24 reporting, which serve as crucial touch points in
25 what MOIA views as a continuous cycle of improvement

2 rather than a one-time checklist. We actively engage
3 with covered agencies throughout the year. During the
4 six months of this year, for example, MOIA
5 intensively guided agencies through the process of
6 updating their implementation plans that include
7 detailed guidance and incorporating recent expansions
8 of Local Law because of new legislation. We hosted 10
9 convenings to focus on developing specific sections
10 of the plan, creating valuable opportunities for
11 agencies to share best practices and learn from one
12 another. The public can now view these updated plans
13 on each agency's website, as required by the law, as
14 well as on MOIA's website, nyc.gov/immigrants.

15 The annual reporting cycle, now aligned
16 with the Fiscal Year, provides another key anchor for
17 monitoring progress. Through an annual survey, MOIA
18 collects critical information on agency progress and
19 challenges, which then informs an annual report that
20 MOIA submits to City Council by December 15th. This
21 process helps identify priority areas for targeted
22 support for the coming year, ensuring that language
23 efforts continually adapt to changing needs. I would
24 like to highlight here that MOIA collaborates closely
25 with the Mayor's Office of Operations to ensure the

2 effectiveness of the reporting process. We are
3 working increasingly in tandem to improve
4 measurements for language access and strengthening
5 the overall monitoring system. Together, we aim to
6 continue developing more comprehensive metrics and
7 evaluation methods that will provide a clearer
8 picture of language access progress across City
9 agencies and will identify areas for continual
10 improvement.

11 And just stepping aside from the remarks
12 here, this is a critical piece of how we envision
13 working to fulfill the City's obligations around
14 language access, not just with the spirit of, not
15 just the details of Local Law 30, but embedding
16 language access more comprehensively across all
17 operations so that it's no longer an afterthought,
18 but a core piece of management, management of City
19 operations, management of City functions, of
20 communications, of the success of City agencies in
21 delivering upon their missions to serve their
22 constituents, their target audiences.

23 We supplement these structured processes
24 with proactive outreach, one-on-one technical

2 assistance and additional guidance through
3 convenings.

4 In addition to our ongoing monitoring and
5 oversight of agencies covered under Local Law 30,
6 City Council has passed new laws on access since its
7 last oversight hearing on this topic in 2018. We want
8 to acknowledge and celebrate the Council's advocacy
9 and collaboration with community organizations to
10 advance language access, and we look forward to
11 continuing to work together to improve language
12 access across all forms of government and all
13 jurisdictions.

14 The next section of this testimony is
15 focusing on Local Law 6 and Local Law 13 because of
16 the way in which those have played an important role
17 in how MOIA has been rethinking how it monitors and
18 advances language access. There's more in the
19 testimony that we will submit, but I will focus on a
20 few things.

21 First, Local Law 6 presents an
22 opportunity to explore how community-based
23 organizations, in particular those that are already
24 focused on serving immigrant communities, can be part
25 of the solution to language access in New York City.

2 Local Law 6 required MOIA to conduct a survey of CBOs
3 to assess their capacity to provide language
4 services. We've also consulted with the Department of
5 Small Business Services, the Mayor's Office of Non-
6 profit Services, and the Mayor's Office of Contract
7 Services, and then reached out to over 2,000 CBOs
8 with this survey. We collected responses from 63 CBOs
9 and had informative conversations with 14 of them
10 using two focus groups to discuss their language
11 service delivery and other vehicles for language
12 access support. We'd like to in Q and A discuss some
13 of the engagement more. It's been very informative to
14 us, and it's helped to provide some information of
15 how we might be able to move forward together.

16 Second, under Local Law 13, whenever a
17 global event, occurrence, trend, or pattern occurs
18 that causes new populations to arrive in the city and
19 seek services, the Office of the Language Services
20 Coordinator must now designate temporary languages
21 that need to be taken into account. Given the large
22 number of new immigrants from West Africa that have
23 arrived in the city in recent months, the City's new
24 temporary languages as designated are Wolof and
25 Pulaar. We'd be happy to share how that was

2 determined, but we'll share here at this point that
3 implementing services in Wolof and Pulaar presents
4 unique challenges that go beyond mere translation
5 and, in some sense, some of the limitations of Local
6 Law 13, as the written systems of these languages are
7 not widely used by the speaking populations. We've
8 taken a proactive and collaborative approach to
9 develop more nuanced guidance, including extensive
10 consultations with linguists, frontline staff, and
11 speakers of these languages to better understand the
12 landscape and how to provide language access in the
13 most effective way.

14 In addition to these laws, MOIA provides
15 technical assistance and training to agencies
16 throughout the city through direct consultation,
17 regular convenings, an internet portal, and a
18 newsletter. We provide support and guidance for both
19 agency language access coordinators and other
20 colleagues. Our team also pays close attention to the
21 federal, state, and city legislation related to
22 language access as well as the developments in the
23 rapidly changing language service and technology
24 industry, roughly 50 billion dollars worldwide.

2 In addition to this work, I would like to
3 spend just a moment speaking about the Language
4 Access Hub Initiative. Under this Administration,
5 Commissioner Manny Castro has focused additional
6 resources on expanding our internal efforts. This
7 initiative involves an expansion of our language
8 access team. Over the last 18 months, MOIA has gone
9 from one full-time staff member and two colleagues on
10 temporary lines to a team of 18. We now have three
11 full-time staff working on language access and 15
12 staff members, two project managers, and 13 linguists
13 or language access specialists who provide
14 translation and additional support primarily for
15 MOIA, Mayor Offices, and City Hall, and a lot of the
16 team is here with us in the audience today. I will
17 add that it's my great honor to work with them. I
18 learn daily from people who are dedicated to making
19 sure that multilingual communications are effective,
20 and we use this to expand how we think about work
21 across the Mayor's Office and across City agencies.

22 I would like to touch briefly on Council
23 Member Hanif's current proposal, Intro. 215, that
24 would require the creation of an Office of
25 Translation and Interpretation with MOIA. Our

2 practical experience in trying to expand our
3 translation team within MOIA as well as past
4 discussions with New York City Public Schools Office
5 of Language Access about their Translation and
6 Interpretation Unit...

7 CHAIRPERSON AVILÉS: Mr. Lo, we're having
8 technical difficulties. If you could pause for a
9 quick second.

10 SENIOR ADVISOR LO: Sure, absolutely.

11 CHAIRPERSON AVILÉS: Thank you.

12 Okay, it looks like we are back. Thank
13 you all for your patience in that technical
14 difficulty moment.

15 I'd like to acknowledge before we resume
16 with the testimony from the Administration, we were
17 joined by Council Member Bottcher and Council Member
18 Joseph. Thank you for being here.

19 Mr. Lo, back to you. Thank you so much.

20 SENIOR ADVISOR LO: Thank you, Chair
21 Avilés. After that dramatic pause and, for a moment
22 there, the hot seat got to be a little lukewarm.

23 When we last left you, I was talking
24 about the growth of our team and how that informs our
25 position on Council Member Hanif's bill, Intro. 215.

2 I was speaking about the practical experience we've
3 had trying to grow our internal translation team and
4 the past discussions that we've had with New York
5 City Public Schools Office of Language Access about
6 their Translation and Interpretation Unit and, as a
7 result, we do not support the bill as it is written.
8 We are certainly in agreement with a lot of the ethos
9 of it and the intent and we do agree that some
10 centralization of resources would benefit City
11 agencies, and we're open to discussing more with
12 Council about options for the City to expand language
13 services. In many ways, our work at MOIA, we've
14 considered it to be a language lab where we can
15 explore potential resources and practices and assess
16 how they may be shared out with City agencies, and
17 this is also one of those arenas so we do look
18 forward to exploring what would be the most
19 appropriate set of solutions to advance language
20 access and language services across City agencies.

21 I would like to also mention that we have
22 taken an increasingly collaborative approach to
23 expand strategic capacity building. That's one of the
24 pillars of the work at MOIA and the way we're
25 approaching language access. To cut things short

2 here, we've been working in the past with Mayor's
3 Office of Contract Services and DCAS on procurement.
4 We do anticipate in the coming year collaborating
5 with the Mayor's Office of Contract Services to
6 expand the contracted resources for quality language
7 services that will be available across City agencies.
8 In recognition of Intro. 215, there are areas where
9 internal services would make sense, but contracted
10 services will always be an important tool towards
11 meeting the needs at the scale and breadth of
12 languages that the City needs, and so figuring out
13 how to do that in the most advantageous way on many
14 fronts, in terms of quality, fiscally, in terms of
15 advancing opportunities for New York City immigrants
16 with language skills and the language service
17 technology companies that are in New York City.
18 There's a lot that we can do there together.

19 I also mentioned here, in terms of
20 strategic capacity building, we are engaging
21 increasingly with the Mayor's Office of Operations to
22 consider better metrics for language access across
23 agency operations, including those included in the
24 Mayor's Management Report. We are exploring how to
25 build a better dashboard to document and advance

2 language access, and we're also building on the
3 Language Access Secret Shopper Program, which has its
4 roots as an internal customer service initiative to
5 enhance LASS' role in advancing language access
6 maturity. I'll add here that at MOIA, we are very
7 grateful and supportive of the LASS information being
8 folded into Open Data, but I think there are some
9 misconceptions about its intent and the original
10 purpose and structure. It was not intended as a Local
11 Law 30 monitoring tool, in fact predated Local Law 30
12 but, that said, we're looking forward to seeing how
13 it can be incorporated into those efforts so MOIA and
14 Operations have consistently worked in tandem, and we
15 will continue to collaborate closely, tapping into
16 our relative strengths and experience.

17 These cross-agency efforts are central to
18 the goal of embedding language access considerations
19 throughout operations of City government. We are
20 currently seeking to introduce and inculcate language
21 access in existing discussions hosted across other
22 City agencies, such as the Digital Equity Working
23 Group or Outreach Working Group, and through
24 launching our own communities of practice that
25 includes staff from various different agencies to

2 focus on key areas of operations, such as translation
3 leads. In fact, in I think about an hour or two, one
4 of our communities of practice with translation
5 project managers is going to take place. They will be
6 discussing how to improve consistency with
7 glossaries, and that's just an additional arena where
8 we're trying to improve across City agencies. As
9 mentioned, Local Law 30 is now seven years old,
10 although its core is essentially the Executive Order
11 from 2008, and the field of language access itself is
12 now more than 20 years old. Despite persistent
13 challenges, New York City has been at the forefront
14 of language access because of City Council, City
15 agencies, and advocates. In recent years, there's
16 been a groundswell around language access nationwide.

17 At MOIA, we want the City to continue to
18 lead the nation in this field. Old challenges
19 persist. New challenges arise. The scale and
20 diversity of New York City's languages, the
21 traditional reliance on text-heavy communications,
22 and the number of government agencies and systems,
23 they continue to be a challenge. Even the mounting
24 legislative successes in states and cities pose
25 important new challenges for coordination and

2 consistency. In this light, I would want to mention
3 that MOIA is developing, incorporating into our work
4 what we've referred to as a maturity model for
5 language access. This is both a conceptual and
6 practical tool for advancing language access across a
7 range of agency operations for moving from ad hoc
8 responses to building a level of compliance with the
9 solid basic infrastructure in place that aligns with
10 Local Law 30 and then towards more systematized
11 management with strong metrics and feedback loops.
12 This model will provide a roadmap for agencies to
13 continually improve their language access services,
14 moving progressively towards a system that fully
15 embraces New York City's multilingual identity and
16 helps us move towards a more multilingual government.

17 In the end, language access cannot be an
18 afterthought, as is still too often the case. This is
19 also why MOIA is expanding collaborations with
20 partners both in and outside of City government.
21 Internally, we are working to ensure that the
22 upcoming changes to City's technical digital
23 infrastructure incorporate language technology
24 appropriately to advance multilingual communication.
25 We are working also to improve the capacity for

2 multilingual rapid response and emergency
3 communications. Externally, we are committed to
4 supporting community-based language efforts and
5 fostering the development of professional pipelines
6 for current and future linguists and language
7 industry specialists. Just as language access cannot
8 be an afterthought, the communities we serve must be
9 at the forefront of our considerations and decision-
10 making processes and act as partners. I'll just note
11 here the mantra, not for us, without us, applies to
12 the expansion of language access across the
13 government efforts to improve equity and access for
14 all.

15 In conclusion, as we look to the future,
16 MOIA remains committed to advancing the goals of
17 Local Law 30 and, together with Council, improving
18 Local Law 30 while also pushing the boundaries of
19 language access further. Our vision extends beyond
20 compliance to creating a truly multilingual
21 government that celebrates and harnesses the
22 linguistic diversity of our city. We recognize that
23 the diversity of language is an asset and something
24 to be celebrated, a vital thread in this rich

2 tapestry of New York City. I'm happy to answer any
3 questions.

4 CHAIRPERSON AVILÉS: Thank you so much, Mr.
5 Lo. I just want to acknowledge the Administration.
6 Your team has submitted an extensive testimony. Thank
7 you for the grace of shortening that for time so we
8 can get through questions and also get to public
9 testimony so I want to acknowledge that work that you
10 presented and your grace in responding to shortening
11 that. Again, excuse our technical difficulty moment.

12 I guess we'll jump into basics. Again, I
13 want to acknowledge this might be in your testimony,
14 so we'll just clarify for the record and, in some
15 cases, maybe expand on statements that you made in
16 the testimony. To start, what does it mean to be
17 compliant with Local Law 30?

18 SENIOR ADVISOR LO: Thank you for the
19 question. In MOIA's efforts to lead language access,
20 we look to the direct letter of the law in terms of
21 compliance. Of course, we are trying to expand
22 language access even more broadly, but the law as it
23 lays out, there's specific things. Every agency must
24 have a language access coordinator. It must develop a
25 language access implementation plan, and the

2 components of that plan are laid out in the law. The
3 agency must publish that plan on its website and
4 update it at least every three years. The agencies
5 have three language service obligations as guided by
6 Local Law 30. One is to translate most commonly
7 distributed documents into the 10 designated
8 languages. Two is to provide interpretation in at
9 least 100 languages, which in practice means that
10 they must have telephonic interpretation available.
11 Of course, being able to provide in other
12 circumstances with in-person interpretation. Third,
13 they must provide notification of free interpretation
14 services, the availability of such at their
15 locations. I will note that, again, Local Law 30
16 codified the requirements under Executive Order 120
17 back in 2008. It does set a baseline, and we work
18 with agencies to try to push beyond that.

19 CHAIRPERSON AVILÉS: Okay. Are all City
20 agencies compliant with Local Law 30?

21 SENIOR ADVISOR LO: To the degree that we
22 work with them, yes. I will say that when we work
23 with agencies on their language access implementation
24 plans on the annual report, we are working in
25 conjunction with the Mayor's Office of Operations to

2 check whether agencies are in compliance. The
3 Comptroller also does checks on agencies on Local Law
4 30 compliance. They've done about five over the
5 course of the last several years, and they've also
6 found that agencies are largely in compliance with
7 Local Law 30.

8 CHAIRPERSON AVILÉS: I noticed in not only
9 the reports, but certainly your language, there are
10 words that jump out at me. You just said, to a
11 degree. We see in reports that say generally
12 compliant. We also see, depending on. Is there any
13 clear threshold here that MOIA uses to understand
14 compliance? Is it just the three elements or the
15 basic elements, a designated language access
16 coordinator and a plan, but is there anything beyond
17 that that determines compliance or more specific
18 threshold marker?

19 SENIOR ADVISOR LO: In our work with the
20 City agencies, we do basically and, to be frank,
21 that's the approach that MOIA has taken to move
22 language access forward. We are not an enforcement
23 agency. We do take the structure of Local Law 30 as a
24 baseline, and there's a lot of diversity across
25 agencies so we provide the assistance to try to move

2 agencies forward in our annual survey that we provide
3 to agencies as part of monitoring. It uses Local Law
4 30 as the basic structure of the questions that we
5 ask, and then we add additional questions based on
6 what we see as other elements that are important for
7 an agency to have the capacity to move language
8 access forward.

9 CHAIRPERSON AVILÉS: So, in terms of the
10 laws stipulates, I'm going to call it a checklist,
11 not to devalue any of those elements at all, just for
12 sake of, I'm not that creative in my language. So,
13 beyond the checklist, you mentioned other components.
14 I think what we are trying to understand with some
15 clarity is how MOIA is making their assessments
16 around this compliance. So, beyond the checklist,
17 what other elements is MOIA identifying that it uses
18 in making assessments and then if you could note also
19 how often are you assessing?

20 SENIOR MANAGER KWON: Definitely. Thank
21 you so much for that question. We would love to
22 figure out better measurements and metrics for
23 assessing language access in general, and we're
24 increasing our collaboration with Mayor's Office of
25 Operations, as mentioned in the testimony. As

2 mentioned in the testimony, we see the Language
3 Access Implementation Plan and the reporting as the
4 two main anchors of ensuring compliance of all
5 agencies. This year has been the year that most
6 agencies had to update their Language Access
7 Implementation Plan. Because we walked them through
8 population assessment of limited English proficiency,
9 we do see that each agency has unique needs and
10 unique resources so we do not think that one standard
11 can assess all the uniqueness of each agency.

12 However, while that being said, when
13 reviewing the plans, we looked at four different
14 criteria to ensure some of those components are in
15 their plans. One, the accessibility and the
16 usability, two, the section details and explanation,
17 three, clarity of goals, and four, completeness of
18 their supporting documents and, after reviewing the
19 draft of each agency's Language Access Plans, MOIA
20 provided tailored guidance. As mentioned, they have
21 unique needs and unique resources. We want to provide
22 targeted, tailored guidance for each agency. We also
23 believe that the plan is only good as it's
24 implemented so we make sure that we're annually
25 reporting on their Language Access Implementation.

2 So, this year we have increased our collaboration
3 with the Mayor's Office of Operations, and we
4 actually met with the Language Access Coordinator two
5 times this month to guide them through the annual
6 reporting. We plan to analyze the goals set by the
7 agencies in their plans, analyze those goals, and set
8 each metrics with the Ops to understand their
9 progress towards their goals so, yes, we would love
10 to develop more, we would love to strengthen
11 monitoring system.

12 CHAIRPERSON AVILÉS: Could you repeat very
13 quickly the four elements? You said accessibility.

14 SENIOR MANAGER KWON: Yeah. These are the
15 ways we looked at all the plans. The first one, we
16 looked at the accessibility and usability so we're
17 understanding if it's readable. Second, we're looking
18 at section details and explanation, making sure that
19 all the components that MOIA required are in each
20 section. Third is the clarity of goals. We thought
21 that the goals were one of the good measurements and
22 measuring tool that we could set in the future so
23 that was one of the other components. And the last
24 one was the completeness of their supporting
25 documents.

2 CHAIRPERSON AVILÉS: Got it. Thank you. I
3 appreciate that. That's very helpful, and I would
4 agree that a plan is only as good as the
5 implementation. What kinds of criteria are you using
6 around assessing implementation?

7 SENIOR MANAGER KWON: Yeah. No, thank you
8 so much for that question. So, for implementation,
9 when each agency do have issues or are getting
10 complaints, we provide technical support. We assess
11 every year on the implementation of the plan and then
12 we submit the annual report to the City Council by
13 December 15th so that is one tool that we're
14 utilizing to assess the implementation.

15 CHAIRPERSON AVILÉS: Is the metric 3-1-1
16 complaint? What's the metric that, I think I missed
17 the metrics that you're using to assess
18 implementation?

19 SENIOR MANAGER KWON: Oh, so, we're
20 utilizing the annual reporting as one tool to assess
21 the agency's implementation of language access.
22 Currently, the local authority sets different metrics
23 on what to be reported on the annual report, such as
24 the 3-1-1 complaint numbers and other ways agencies
25 have received complaints. Another way, thank you for

2 Local Law 6, we are collecting expenditure report
3 from agencies on how much they have spent each fiscal
4 year on language services. That's another good metric
5 tool that we're trying to figure out how to make it
6 more accessible and usable for our assessment of
7 their implementation of language access.

8 CHAIRPERSON AVILÉS: So, I guess what I'm
9 hearing is, as per your own assessment and the
10 criteria that you're currently operating under, that
11 all City agencies are compliant?

12 SENIOR MANAGER KWON: Generally, yes, and
13 we do want to move agencies forward. We are not
14 looking for compliance, we are looking for agencies
15 to move towards a true language access, not just the
16 compliance set by Local Law 30. Ways we do that is
17 embedding some of our values and approaches into our
18 guidances on language access implementation plan. One
19 of the changes this year on our guidance is that
20 under our operation of language services section, we
21 required agencies to look at bilingual staffing, look
22 at CBO partnership, and also language service
23 contracts. We think that we need to utilize all the
24 tools in our toolbox in order to make sure that
25 language access is being met.

2 CHAIRPERSON AVILÉS: I'm stuck here with
3 language, but in terms of areas, obviously each
4 agency is in a very different state, but in terms of
5 trends, you're working across multiple agencies. Are
6 there areas, I'm going to call it non-compliance
7 and/or real challenges that exist, because for a
8 number of different reasons, are there trends that
9 you are seeing across agencies where there are some
10 real problems or just problems in general?

11 SENIOR MANAGER KWON: Yeah. To be honest,
12 we are also working towards maturity model of our
13 monitoring system as well. We think, ourselves, as
14 monitoring system right now is on the compliance
15 level as well. We want to get there of analyzing some
16 of the trends more systematically in order to provide
17 agencies with more tailored and targeted technical
18 support. We hope to get there in partnership with
19 Mayor's Office of Operation to decide on the metrics
20 together, make those transparent and available for
21 the public, and also make sure that we're looking at
22 the foresight and not the hindsight.

23 CHAIRPERSON AVILÉS: Yeah. Jump in,
24 please.

2 DIRECTOR STEINBERG: Hi, Dan Steinberg
3 from Operations. I'm happy to elaborate on the nature
4 of our work together, but just wanted to point out
5 from a data perspective, I think your point is very
6 well received. If you look at the MMR, for instance,
7 there are dozens of indicators that speak to the
8 volume of interpretation services, and they're very
9 valuable in the sense that you get an immediate
10 command over which agencies are doing the most
11 interpretation for which services. You see the ebbs
12 and flows, and you see the City's ability to adjust
13 to new demand. In the last Fiscal Year, the report
14 was remarkable in that some agencies completed
15 requests for translation services 20 to 50 percent
16 higher than they'd done previously. With 3-1-1, the
17 really remarkable number was the amount of service
18 requests that they fielded in languages other than
19 English and Spanish. You see these really important
20 trends, but I think as you're implying, you're right
21 that they speak much more clearly to volume rather
22 than quality. I do want to point out that all of
23 these indicators, the Local Law 30 report, of course,
24 is annual, but these indicators are pushed out
25 quarterly through our website on the Dynamic Mayors

2 Management Report. I think there is some consensus
3 here that the data in terms of its ability to speak
4 to the quality and comprehensiveness around complying
5 to the spirit of these local laws, I think there is
6 room for progress there, and that's our focus.

7 CHAIRPERSON AVILÉS: No, thank you for
8 that. I think as we're looking at the reports,
9 obviously it is complex, but it's hard to find where
10 the floor is and where the ceiling is because it
11 leads you to a conclusion of haphazard as opposed to
12 building, despite the environmental context, which
13 keeps changing. The needs are shifting for sure. I
14 think we're trying to understand how the
15 Administration is assessing and building and what
16 thresholds are they setting for agencies so that we
17 are not caught in the first floor until the end of
18 time. We're not making any progress. We're investing
19 enormous amounts of money and energy, and we still
20 can't get basic documents translated. This is what
21 we're trying to figure out how to get at.

22 SENIOR ADVISOR LO: Chair Avilés, I would
23 add, over the course of administering or guiding
24 agencies through Local Law 30, I'll say that the work
25 that my colleague Young was just speaking about on

2 the last round of implementation plans, it reflects
3 two cycles of working with agencies on the previous
4 plans, where my former colleague and I, we were
5 focused on what we would call basic infrastructure,
6 making sure that there was contracts in place, a
7 protocol for internally getting materials translated,
8 training, some of the things which aligned with the
9 details of Local Law 30 and others that didn't. We
10 found that over time that having a dedicated leader
11 on the language access front, a language access
12 individual whose primary role was language access, as
13 opposed to an additional requirement, was essential.
14 In particular, if there was a team, we find that
15 there's more capacity to move that work forward, and
16 especially in terms of working effectively with the
17 contracted services. One of the arenas where we were
18 trying to provide guidance and technical assistance
19 and training to language access coordinators was
20 around how to work more effectively with contracted
21 vendors, because as mentioned in testimony, that's
22 certainly a critical way to provide those services so
23 having a system in place, having an appropriate
24 relationship, a professional informed customer-vendor
25 relationship is critical so some of those areas are

2 the kind of capacity building work that we find is
3 really helpful in improving how agencies deliver on
4 that. Now that's, again, that's just one arena where
5 having a team and having more knowledge around how
6 language access fits into specific arenas within the
7 agencies, so not just the language access coordinator
8 coordinating everything, but also communications
9 leads, outreach leads, contracting leads who can
10 embed language access into their work is where we
11 need to head, and the agencies that have done better
12 on language access are those that have placed that
13 kind of attention and resources into building out so
14 some agencies will be better than others. We want to
15 make sure that we're sharing the best practices and
16 sort of raising the level of expectation across
17 agencies to deliver on language access.

18 CHAIRPERSON AVILÉS: Yeah, thank you. I
19 mean, certainly raising the standard, right? If we
20 know what the appropriate mix is, whether funding,
21 contract services, having a certain level of
22 multilingual staff, we have to move beyond a gentle
23 nudge and a fundamental requirement, right? If we're
24 going to lean into our responsibility to meet our

2 citizens where they need to be met in the that they
3 speak, we have to move beyond suggesting.

4 SENIOR ADVISOR LO: Yeah, I think that's
5 exactly where the work that Young and I are working
6 in conjunction with the Mayor's Office of Operations
7 really wants to take this. As Young mentioned, Local
8 Law 6, which shifted the reporting to the fiscal
9 year, was really important for us as an agency
10 pushing language access because it puts the reporting
11 and the considerations into the fiscal year cycle,
12 which allows us to work with agencies better in terms
13 of budgeting, planning, monitoring, evaluation, and
14 to ultimately embed language access into the
15 operations of any agency, and with the work together
16 with operations, we hope to advance that even
17 further.

18 CHAIRPERSON AVILÉS: Right. So does MOIA
19 have a database of translated materials across City
20 agencies?

21 SENIOR ADVISOR LO: We currently do not.
22 That is something that we anticipate working on in
23 the coming year because of two levels. One is the
24 closer engagement with the Mayor's Office of
25 Operations and, two, our engagement with OTI, Office

2 of Technology and Innovation. They have, as you may
3 have seen with the MyCity project, there are efforts
4 underway to update their underlying digital
5 infrastructure and, as I mentioned in testimony,
6 we're very interested in making sure that with those
7 advances that considerations around multilingual
8 communications is embedded in that work and, with
9 that, it provides an opportunity also to more
10 effectively collect the materials that they're
11 putting out to make sure that we're monitoring that
12 they're available in other languages as well.

13 CHAIRPERSON AVILÉS: Got it. So in terms
14 of, is it the responsibility of the language access
15 coordinators to report either non-compliance or
16 little capacity or little inability to meet language
17 needs?

18 SENIOR ADVISOR LO: Language access
19 coordinators are set up to be the point person at
20 their respective agencies to understand the
21 obligations to communicate them with the rest of the
22 agency and to advance language access. I will add
23 here that this is one of the arenas where MOIA, when
24 we're considering how to improve Local Law 30, is to
25 reconsider or to think about how those language

2 access coordinators are designated and to ensure that
3 they have the resources that they need to do that
4 work effectively. Currently, the law does not specify
5 who that language access coordinator should be. We
6 certainly have some thoughts on that, which we would
7 love to discuss further with Council along with other
8 arenas and to improve Local Law 30.

9 CHAIRPERSON AVILÉS: I'd love to. It
10 sounds like you've thought about this and you've
11 looked at it. What are the recommendations that MOIA
12 has put forward around how to improve language access
13 coordination?

14 SENIOR ADVISOR LO: Well, there are
15 certain arenas that, I will say over the course of
16 implementing Local Law 30 or helping to guide
17 agencies to implement Local Law 30 over two cycles
18 and now into a third, I find that it's an extremely
19 valuable tool, but it is in some ways, we've used the
20 term, a blunt instrument. It was very useful in
21 setting the stage, but as our work continues, we try
22 to refine how from our end, we can do monitoring in
23 conjunction with operations to embed those language
24 access considerations into the processes and the
25 monitoring processes of the City. Internally, when we

2 guide agencies, we specify what those requirements
3 are per se. Just the naming of a language access
4 coordinator is a step, but making sure that the right
5 person is in the job would certainly advance how
6 agencies can move forward with language access.
7 Language access coordinators is one arena. Providing
8 more explicit guidance to agencies around what needs
9 to be translated. Providing more specific
10 requirements around training. Those are some of the
11 areas that Local Law 30 could certainly improve.

12 CHAIRPERSON AVILÉS: Does MOIA have plans
13 to advance these recommendations that could
14 materialize improvements in services, or when do we
15 get there, because we're in year seven?

16 SENIOR ADVISOR LO: Yes, I would say,
17 Chair, that we have thought about this. We want to do
18 this work better with the agencies, and we have a
19 list of items that we would love to work with Council
20 on as potential amendments to Local Law 30.

21 CHAIRPERSON AVILÉS: Are you suggesting
22 that this program cannot be improved through the
23 administration of it, that it requires a policy
24 change?

2 SENIOR ADVISOR LO: No, I appreciate that.
3 We take language access seriously. We work with
4 agencies to improve this. Local Law 30 is a broad
5 baseline. Agencies look for more explicit guidance.
6 The law is a very useful tool in driving agencies
7 forward, some in particular more than others. You
8 know, some agencies, they really do have advanced
9 language access to improve on their missions. Others
10 are slower. We work from our end to make sure that
11 agencies have the resources and guidance that can
12 help them move forward. We're working on the
13 monitoring side. I think it does take both work on
14 our end and, of course, on the end of the agencies.
15 Improving the law, improving the monitoring systems,
16 improving the resources in place, improving the
17 feedback loops, all of these things, I think, would
18 help advance language access.

19 CHAIRPERSON AVILÉS: Sure. I think it's
20 almost like teachers who teach varying levels within
21 a classroom, right? There's a technical term for it
22 that is escaping me. Some are moving faster and some
23 just have different needs. I guess I'm wondering, as
24 you are doing this work and assessing and seeing
25 trends across and knowing which students are moving

2 faster and which need a different, why would we wait
3 to provide the tools and the guidance to move fast
4 for those who can move faster and meet those
5 obligations for larger kind of policy? This feels
6 like administrative choices that are being made
7 around how this daily operation happens.

8 SENIOR ADVISOR LO: I think that's a fair
9 question. I think that's one of the elements behind
10 our developing a maturity model. We really want to
11 create a roadmap for all agencies to do the work
12 across their areas of operations better. I think one
13 of the challenges around language access is that it
14 is an afterthought. It tends to be an afterthought.
15 At the same time, it's an all-of-government kind of
16 issue. Part of the technical advice and guidance we
17 give agencies is around how to think about these
18 things and to move language access more upstream in
19 the considerations, whether people, whether budgets,
20 whether systems.

21 CHIEF POLICY ADVISOR LUCERO: I'll just
22 add a couple of things that I think are also relevant
23 here. The law has been in existence for what? I think
24 it's seven years?

25 CHAIRPERSON AVILÉS: Seven years.

2 CHIEF POLICY ADVISOR LUCERO: MOIA and the
3 leaders within this work, we ourselves have been
4 growing in the past two years. I think that there are
5 lessons that we're learning right now. I know that
6 Ken mentioned this when he was speaking, but we
7 really consider ourselves right now as a language lab
8 in best practices and ways. I think something that we
9 have been doing proactively with the (INAUDIBLE)
10 students in our class or students who need a bit more
11 help is that we're being more intentional in the
12 times and how we are bringing them in collectively to
13 share best practices. I think as the year progresses,
14 we will have more. Part of it in the testimony, I
15 know that there's goals for us to provide a more
16 centralized method for language coordinators, for
17 example, to have an online portal for them to have
18 information at the ready. We're learning a lot from
19 our linguists that are sitting right behind us in
20 regards to best practices within their communities
21 and languages. I think right now we're part of the
22 beginning stages. However, I still think that the
23 addition, especially in the last two years of
24 providing the technical assistance that I think we
25 had previously, but I think now we're being more

2 intentional about it. I think we'll see changes in
3 the City to come.

4 CHAIRPERSON AVILÉS: Yeah, thank you for
5 that. I guess in curiosity, where do you think
6 enforcement of this law should exist and what should
7 that look like?

8 SENIOR ADVISOR LO: That's a good
9 question. Our focus from the Mayor's Office is on
10 supporting, providing guidance and assistance and a
11 pathway forward. We are not an enforcement agency.
12 There are certain just compliance checks that we do
13 to make sure that those pieces are in terms of the
14 reporting are done. The ongoing collaboration with
15 Operations around metrics is leading towards a better
16 situation where we can do more direct compliance
17 measuring. I think it's more of having more direct
18 measurements to hold agencies accountable to, which
19 we don't currently have.

20 CHAIRPERSON AVILÉS: So skillfully
21 navigated, not answering the question, where do you
22 think enforcement should exist? Should it exist in
23 the Mayor's Office of Operations or should it exist
24 in MOIA? Should enforcement exist on language access?
25 We have a law. We are trying to get everyone to meet

2 the law very gently with some investment in growing
3 data, growing infrastructure, but where should the
4 enforcement to ensure that our City meets this law,
5 meets the needs of immigrant communities exist? Do
6 you have a sense of that? Should it be the Mayor's
7 Office of Operations? Should it be MOIA? It's not a
8 trick question, or maybe it is.

9 DIRECTOR STEINBERG: Dan Steinberg. I
10 think it is a trick question to be frank, but I'm not
11 an attorney. When I look at the letter of the law,
12 there's a lot of language around to the extent
13 practicable and reasonable efforts toward, and that
14 is not necessarily a very straightforward environment
15 to enforce anything, but I do want to clarify that we
16 also don't have enforcement authority. Obviously, we
17 have a program that..

18 CHAIRPERSON AVILÉS: Right. I'm asking, I
19 guess, you as practitioners, right, who are charged
20 with meeting this law and are charged with engaging
21 with the agencies, and what we see is obviously
22 growth and we see real challenges to meet it and
23 everyone says, well, I'm not an enforcement agency, I
24 can't be held accountable here, and I am asking as a
25 practitioner, where should enforcement live?

2 Obviously, it could change depending on the context,
3 but as practitioners have seen the implementation and
4 development of this infrastructure, where should
5 enforcement live to ensure that we meet the mandate
6 of the law so we don't hear over and over again, I'm
7 not the enforcement agency.

8 DIRECTOR STEINBERG: No, I understand
9 that, and I think it's a fair premise. I think the
10 problem is that we're... what are we talking about
11 enforcing exactly? You heard the sort of core purpose
12 of this law and the criteria by which it's been
13 defined and all the work that's been done revolves
14 around that criteria, but there's also a reason why
15 eight different audits from outside stakeholders,
16 different Comptrollers and other oversight bodies all
17 say generally compliant. It's because generally
18 compliant isn't to the satisfaction of the Council,
19 and that's a different question.

20 CHAIRPERSON AVILÉS: Well, generally
21 compliant shouldn't be the satisfaction of anyone
22 quite frankly.

23 DIRECTOR STEINBERG: Right, right.

24 CHAIRPERSON AVILÉS: We should be fully
25 compliant and singing through the rooftops that our

2 city is doing something beyond so what we are trying
3 to do is move beyond the floor at year seven, and I
4 think there's obviously a lot of progress. There is
5 building of staff, but I'm asking for your input as
6 the practitioners here that are overseeing, where
7 should enforcement, where should that standard be,
8 because the continuation of a death loop is what I
9 call it or the death spiral of like nobody's in
10 charge of anything is profoundly frustrating,
11 particularly in the context where we see serious gaps
12 and then everyone's generally compliant. It's a
13 frustrating affair so I was just asking if you had
14 opined on this and have some suggestions about where
15 that apparatus could be and should be to move us
16 along our continuum.

17 DIRECTOR STEINBERG: Got it. I fully
18 understand. I just think this entire...

19 CHAIRPERSON AVILÉS: So we don't have an
20 answer, it sounds like it's the answer, which...

21 DIRECTOR STEINBERG: Well, no, I think the
22 entire formal infrastructure is predicated on
23 continuous improvement and that's exactly what
24 happens. I think if we're talking about agencies
25 following the law or not, it's a very different

2 question than the subject of today's hearing because
3 these aren't laws that are being broken. These are
4 best practices that are being promoted, and I totally
5 agree the City needs to be creative and proactive in
6 order to achieve any of those goals, but I just think
7 we have to distinguish between a formal legal
8 compliance issue and the City's ability to take full
9 advantage of these tools that have been given to us
10 through all of these local laws.

11 CHAIRPERSON AVILÉS: So we need a much
12 stricter law is what you're saying.

13 DIRECTOR STEINBERG: Well, no, actually, I
14 think it's very nuanced. I think that we need
15 citywide laws to raise the floor and create a very
16 high standard, but the system needs to be
17 decentralized enough where agencies who have
18 expertise in terms of which populations who speak
19 which languages access which services, where they
20 have some discretion and ability to be nimble and
21 targeted, and so creating a sort of regime where you
22 have high standards that are enforced but are nimble
23 enough to let agencies exercise their expertise and
24 discretion is very important.

2 CHAIRPERSON AVILÉS: I agree with the high
3 standard. I think that the problem is we're stuck at
4 the floor and the high standard is not clear because
5 there is such a diversity of capacity and challenges
6 and there's no enforcement apparatus and no one who
7 is responsible, although we're trying to move things
8 forward in a positive direction so I think we've
9 belabored the point enough.

10 I'm sorry, Mr. Lo, you want to respond?

11 SENIOR ADVISOR LO: Sure. I want to add
12 that this is in our arena, we are committed to moving
13 forward to language access. If that means being the
14 seat of compliance or monitoring, that's what we'll
15 do. I think just with all the recognition of things
16 that we've been talking about, the challenges of
17 doing so, and our ongoing approach to improve on the
18 work, it is all towards making sure that agencies are
19 complying with the law. The statement that we're not
20 an enforcer is built on the nature of our office, the
21 scale, the fact that a year and a half ago there was
22 really not much of a language access team. We've
23 grown. As long as we can continue that work going
24 forward and we have resources in place to do so, it's
25 something that we're committed to doing.

2 Historically, we haven't been quite in the position
3 to do so over the course of most of the language
4 access oversight of Local Law 30. It was my boss and
5 me doing most of the work. With the commitment of
6 this Administration and with Commissioner Castro,
7 we've been able to grow the team and we'd like to
8 keep on a course where we can hold more agencies
9 accountable to the extent that we can.

10 CHAIRPERSON AVILÉS: Right. No, I
11 appreciate that. We can't hold the agencies
12 accountable is the point, but we're growing the
13 infrastructure. Again, certainly, we are delighted
14 that there have been increases in staff because it
15 begins to show the commitment to this effort.
16 Clearly, we need a lot more investment. It is one of
17 the most fundamental responses we hear across city
18 agencies. I, in fact, have had my very own
19 experiences of having a fire, 140 people out on the
20 sidewalk with no documentation from emergency
21 services in Chinese. I called the Mayor's Office.
22 FDNY had nothing. MOIA, we called MOIA. No one had
23 staff. They Google translated emergency documents,
24 which were gobbledygook, as you know. We have a long
25 way to go.

2 Part of the question is, how do you
3 vision as you move forward and you're building this
4 infrastructure that we have some levels of
5 accountability so that we are growing? It is really
6 to get your sense of that who are really just
7 building it because there's still really serious,
8 persistent gaps on things. When you say we're
9 compliant on Local Law 30, and yet there's an
10 emergency service situation and we can't get a basic
11 document in Chinese. That problem there is crazy-
12 making, right? To hear you're compliant, and yet a
13 City can't produce an emergency service document in
14 one of the languages it says it has and supposed to
15 do by the law so this is part of that pushing the
16 threshold and standard because I do think we're going
17 to continue to do better. We're all committed to
18 this. I think I want to move on because we've
19 belabored the point.

20 Could I ask, could the City face
21 liability if a translation is wrong?

22 SENIOR ADVISOR LO: Thank you for the
23 question. I would have to defer to the Law Department
24 on that. I think it's a fair question. I don't have a
25 particular answer at this point, but we'll look into

2 that, and I think that's part of the context of also
3 improving language access.

4 CHAIRPERSON AVILÉS: Great, thank you. If
5 someone does not receive interpretation when seeking
6 services from a City agency and calls 3-1-1 to submit
7 the complaint, does that complaint go to MOIA or does
8 that go back to the specific agency that did not
9 provide the language access service?

10 SENIOR MANAGER KWON: Thank you for the
11 question. We think the complaint system is one of the
12 really good tools to listen to the community member
13 who are impacted. We do report on that on our Local
14 Law 30 report. We mention who is getting the
15 complaints and how those are getting resolved and
16 addressed and resolved. Most of the 3-1-1 language
17 access complaints are usually pointed to the language
18 access coordinators of those agencies. MOIA is copied
19 onto those and we track them and report on our local
20 authority annual report.

21 CHAIRPERSON AVILÉS: So it goes to the
22 agency and then as you're doing the survey, you
23 report on it?

24 SENIOR MANAGER KWON: Yes.

2 CHAIRPERSON AVILÉS: Got it. Okay, that's
3 helpful.

4 Is it true that with the expiration of
5 the DCAS contract, agencies are using their own
6 funding to contract for language access services?

7 SENIOR ADVISOR LO: The DCAS contracts
8 were set up so that DCAS had been the central
9 administrator of them but each agency, even under
10 those contracts, were required to buy into those
11 contracts so all of the funding was provided by the
12 agencies. Those contracts expired because DCAS was
13 having certain bottlenecks that impacted across
14 agencies, like some agencies, of course, use much
15 more than others. In trying to increase contracts to
16 meet those needs, it created situations where others
17 didn't have access and so, actually, DCAS moved out
18 of the role of having a centralized contract except
19 for telephonic and now video remote interpretation,
20 and the reason for that is as one of those arenas
21 where a citywide contract was required to make sure
22 that the vendor had the technical infrastructure to
23 meet the demand for such a large-scale use.
24 Currently, agencies do buy their own contracts. We've
25 provided some guidance. Moving forward, as I

2 mentioned in testimony, we do want to work with the
3 Mayor's Office of Contract Services to establish a
4 more what we would call a pre-qualified list of
5 vendors so that we ensure that they meet a certain
6 quality threshold and also to ease the procurement
7 burden from agencies. Amongst the many things that
8 agencies procure, language services is a very
9 specific kind of service, and we want to make sure
10 that we're contributing to make sure that there's an
11 appropriate set of partners with City agencies to do
12 that work.

13 CHAIRPERSON AVILÉS: Thank you. In the
14 report, I counted 135 distinct contracts and was
15 really curious about the quality of those services,
16 certainly the contract amounts and what the report
17 notes was expended. There's a lot of daylight for
18 certain agencies. I was curious what happens to that
19 funding for a contract that, you know, a million-
20 dollar contract, they only use 200,000 dollars. Does
21 that mean just the 800,000 dollars stays with the
22 agency? Is there financial reasons why agencies are
23 not utilizing the full scope of their project or, you
24 know, of the contract funding? So, I was curious,
25 certainly, how MOIA was either, how they were

2 assessing how City agencies are engaging in
3 contracting services and what happens to those
4 resources that are not utilized.

5 SENIOR ADVISOR LO: Two years ago, we
6 worked with the Mayor's Office of Contract Services
7 and DCAS as DCAS's contracts were sunseting and we
8 provided guidance to the agencies, the ACOs and their
9 procurement teams in conjunction with their
10 collaborators at Mayor's Office of Contract Services
11 to what to look for in vendors. Beyond that, there's
12 guidance from the Mayor's Office for Minority and
13 Women-Owned Business Enterprises to advance
14 initiatives to get more purchasing dollars to those
15 types of business enterprises, and we've helped the
16 agencies put contracts in place. I would say that
17 they are the current state of affairs, in some ways a
18 bit of a stopgap. We do want to make sure that in the
19 future that there are better sets of vendors to
20 partners. And then in conjunction with this, so far
21 we've had one round of reporting on language service
22 expenditures because of Local Law 6. We do want to,
23 over the course of the next round and the subsequent
24 round, be more deliberate about what we do with that

2 information and help guide agencies forward in that
3 arena of their language service use.

4 CHAIRPERSON AVILÉS: Great. No, thank you.
5 I think it's good to hear that you're thinking about
6 the pre-qualification and quality of services and
7 certainly the City hasn't had a great track record at
8 managing contractors and being able to make sure that
9 poor performing contractors are not given the gift of
10 City dollars over and over again and providing subpar
11 services to our communities so definitely an area of
12 growth, for sure. Look forward to hearing more about
13 that and the guidance that is being provided.

14 If we could shift really quickly. In your
15 testimony on page 8, you noted some of the challenges
16 of, it's the second paragraph, you noted some of the
17 challenges of the field, particularly you noted like
18 text-heavy communications and a variety of things
19 that you've seen. Can you tell us a little bit more
20 specifically, like what are some of the solutions
21 that you are thinking about in response to meeting
22 these challenges and/or how are you proposing to meet
23 the specific challenges that you've encountered?

24 SENIOR ADVISOR LO: Thank you for the
25 question. Language access is a field ripe for

2 challenges and it's something that, you know,
3 animates our conversations every day, to be honest.
4 New York City, a language city, has so many language
5 resources amongst the communities, but there are
6 certain avenues for the resources, commercial
7 vendors, through CBOs, through City staff. Our
8 conversations are around what do each of those
9 resources bring, what are their strengths, what are
10 the constraints. Finding the right partners to do the
11 work, whether commercial vendors or the community
12 organizations, language justice collaborative. These
13 are all parts of the solutions, including how to work
14 more effectively with bilingual staff, how to hire
15 more agency staff who reflect our communities. This
16 work, so like improving on each of those avenues in
17 tandem to build a better language service
18 infrastructure. So, we spoke a little bit about
19 contracts, improving the quality of those vendors,
20 internally working how staff can partner with them
21 more effectively, working with the communities to
22 both deliver services and to improve opportunities
23 for linguists. I'd like to turn this over to
24 colleague Young to talk about the work around Local
25 Law 6 and the work with CBOs in that particular arena

2 and then also happy to talk more about some of those
3 other challenges.

4 SENIOR MANAGER KWON: Thank you so much.
5 For Local Law 6, we were very excited for the Local
6 Law 6 to be passed with the backing of the Committee
7 Members on this bill. With the survey and afterwards
8 we conducted focus groups with select CBOs to
9 understand how we can strategize our collaboration
10 with CBOs to advance language access, and we're
11 really excited to share the second report that will
12 be hopefully coming out in a few weeks. That really
13 guided us to understand how we can improve our
14 infrastructure and systems so that we can be
15 collaborative with the CBOs.

16 And one mention about the traditional
17 reliance on text-heavy communications in reference to
18 Local Law 13. We do believe that language is not just
19 a communication tool. It's an integral part of
20 people's identity and culture. So, in developing our
21 Local Law 13, setting the guidance on Local Law 13
22 and setting the temporary languages, we spoke to
23 speakers of languages, of asylum seekers, we spoke to
24 staff members who have to directly work with the
25 impacted community members, and all the other

2 agencies that might be impacted to provide more
3 nuanced guidance around the temporary languages. We
4 have set temporary languages as Wolof and Pulaar.
5 Those languages, as we heard from linguists and
6 community members, that the written format is not
7 widely utilized by the community members. As
8 government, we do rely heavily on text communication.
9 In the guidance, we have recommended that relevant
10 agencies look into utilizing audio recordings or
11 visuals to supplement those communications, and NYCEM
12 has done a wonderful job in providing audio recording
13 in their site as well to supplement some of their
14 communication as well, and we look to further advance
15 in this area.

16 SENIOR ADVISOR LO: In terms of the types
17 of communication that the City puts out, along with
18 advancing language access and use of translation
19 interpretation services, we always talk about
20 understanding the audience better, like developing
21 materials with a diverse audience in mind. We've had
22 collaborations with the Service Design Studio in
23 producing a series of community design forums or
24 civic design forums that focused on plain language
25 and working on translations that involved community

2 in the process. I think more of our capacity-building
3 work is really understanding the nature of
4 communications within a diverse city across rapidly
5 changing technical areas so, when we talked in
6 testimony about working more in partnership with
7 certain agencies, whether it's DCAS on the human
8 capital or training front, whether it's OTI on the
9 digital communications front, with MOCS or
10 (INAUDIBLE) on the procurement front, we are trying
11 to make sure that language access is getting
12 incorporated into all of those fields but, especially
13 around plain language, you know, a lot of Council
14 Members, it's a sort of interest and it's included in
15 legislation. I think that's an arena where we can be
16 more clear about the quality of the English content.
17 You know, it's like everyone's at a sort of a
18 continuum around language skills. Clear
19 communications in English is still a challenge for
20 government, as you know.

21 CHAIRPERSON AVILÉS: I can't disagree with
22 that.

23 SENIOR ADVISOR LO: And we also say, you
24 know, garbage in, garbage out.

2 CHAIRPERSON AVILÉS: Yeah. Can I ask in
3 terms of in this context of like responding to
4 specific challenges that you're seeing. As you're
5 well aware of, right, recent reporting has shown that
6 speakers of Haitian Creole have struggled to receive
7 in language documents, particularly in healthcare
8 settings. Haitian Creole is obviously one of the 10
9 citywide languages. Can you walk me through what the
10 administration is doing to meet the language access
11 needs for those who speak Haitian Creole, just like
12 concretely what has been done of recent to meet that
13 growing need?

14 SENIOR ADVISOR LO: Haitian Creole, as you
15 know, is one of the Local Law 30 languages. There has
16 been a number of efforts for a Haitian initiative
17 where MOIA worked in collaboration with community
18 organizations to provide more information, critical
19 for new arrivals or TPS in language.

20 In terms of capacity, this is a common
21 challenge across languages, especially in terms of
22 interpretation, in terms of other languages, new
23 arrivals. There is a limited set of resources in the
24 city. We work with agencies to guide them on
25 translating materials. Of course, they're working

2 with their vendors. There are opportunities to expand
3 the number of linguists and that's kind of like a lot
4 longer-term process but, other than building out that
5 team, it's more like making sure that the materials
6 that need to be in language are going through the
7 appropriate available vendors.

8 CHAIRPERSON AVILÉS: So in terms of you
9 noted building linguists and that being a longer time
10 horizon, what is the Administration specifically
11 doing around building linguists right now?

12 Particularly in the context, we'll keep using the
13 Haitian Creole since it's a clearly identified gap.

14 SENIOR ADVISOR LO: I think the universe
15 of linguists in New York City, it's like New York
16 City being so linguistically diverse is also the
17 source of a lot of potential, whether it's bilingual
18 individuals who have some skills in translation or
19 interpretation or who may be able to work in many
20 other arenas using their language skills, so what we
21 are exploring, and I will say that we do not have a
22 concrete plan yet on this, is working with CBOs in
23 conjunction with our survey around Local Law 6, it's
24 like what other ways can CBOs contribute other than
25 delivering language services directly, like

2 contributing to improving materials, the
3 opportunities to provide training to bilingual New
4 Yorkers, and using those avenues to expand the
5 language field. We also have spoken with folks at
6 CUNY who do have language programs about potential
7 pipelines on that front. We've spoken with folks at
8 Language Justice Collaborative as well, who have
9 interest in working with CUNY on training
10 interpreters so there are a range of avenues to
11 support the universe of interpreters.

12 CHAIRPERSON AVILÉS: Has the
13 Administration invested in any of these avenues, or
14 we're still talking about the possibilities?

15 CHIEF POLICY ADVISOR LUCERO: Yeah, I can
16 add to one on a bit different but also relevant is on
17 the... we recently paired with philanthropy to fund 25K
18 to ICP and 25 to Refugee Translation Project to build
19 language access capacity, and the emphasis here is on
20 training and certification for the folks who are
21 participating in this pilot so that's one, and that
22 recently launched. We'll have more to share probably
23 by the end of the year on what we've learned and how
24 that's going.

25 The partnership with philanthropy is...

2 CHAIRPERSON AVILÉS: What is ICP?

3 CHIEF POLICY ADVISOR LUCERO:

4 International Child Program.

5 CHAIRPERSON AVILÉS: International Child
6 Program, and is this their forte, developing programs
7 around language accessibility?

8 CHIEF POLICY ADVISOR LUCERO: They have
9 worked with the City, particularly with the recent
10 response and providing support in translation and
11 interpretation for languages of West African
12 languages so ICP, and then Refugee Translation
13 Project, which has done this work previously so
14 that's one part that's not particularly with Haitian
15 Creole, but with Haitian Creole in what Ken mentioned
16 through our Haitian Response Initiative, there was a
17 very intentional investment that was made. I believe
18 it's 8 million for legal services and development of
19 resources that are done and provided in Haitian
20 Creole. Hiring linguists, working with community-
21 based organizations that were working with this
22 particular community, and this, of course, was as a
23 response to arrivals of that country into the City of
24 New York and also in supporting that with some legal
25 services.

2 CHAIRPERSON AVILÉS: Right, but it doesn't
3 extend to like the medical setting. This is people
4 that are going to non-profits who are getting, you
5 know, services and enrolled in things that they need,
6 but medical setting.

7 CHIEF POLICY ADVISOR LUCERO: Medical
8 settings, I can't really speak to. I don't know if
9 Ken, if you have more background on that particular,
10 but within what we have done within the legal realm
11 and what MOIA led, we can refer to the Haitian
12 Response Initiative.

13 CHAIRPERSON AVILÉS: So let's shift a
14 quick second to the Language Access Hub. Can you
15 explain for the record what is the Language Access
16 Hub?

17 SENIOR ADVISOR LO: Sure. The Language
18 Access Hub is an effort from our Commissioner and our
19 team to expand the internal capacity to work on both
20 language access side and language services side. As
21 mentioned previously, we had a very small internal
22 staff working on this front, but language access is
23 one of the pillars for Commissioner Castro.

24 So, on the language access side, we have
25 more capacity to work with Local Law 30. We have

2 three staff currently working on the language access
3 side. Young, myself, and Alicia Lopes (phonetic),
4 who's our Capacity Building Manager to lead some of
5 the efforts around building our communities of
6 practice, providing more resources across City
7 agencies while we also work on the monitoring front.
8 The bulk of the Hub has been to bring in more
9 capacity to do translation work and be partners on
10 providing language services. We now have 13 language
11 access specialists across nine languages. The intent
12 is to have where possible two linguists per language,
13 and we want to make sure that we're growing,
14 continuing to grow that out. The focus was on
15 providing translation services for MOIA, Mayoral
16 Offices, and City Hall, and the value of having
17 internal translators or language staff is to help
18 provide direct services, be more responsive to
19 improve quality, and also to contribute towards tools
20 that we think will help our work and also help City
21 agencies, and anticipate doing more workarounds common
22 glossaries and terminology, style guides. Also as
23 mentioned in testimony with parts that I was not able
24 to get to, they've contributed to a lot of other
25 arenas, including to the Secret Shopper Program, to

2 visiting asylum-seeker sites, including the Arrival
3 Center and HERRCs, supporting outreach for IDNYC, a
4 broad range, but, you know, the core work is around
5 being linguists and informing the way that we all
6 provide better language services.

7 CHAIRPERSON AVILÉS: So in terms of, is
8 the Hub part of, explain to me a little bit of the
9 infrastructure for this sprawling agency that is
10 MOIA. Who's responsible for managing the Language
11 Access Hub?

12 SENIOR ADVISOR LO: The Language Access
13 Hub is the area that I'm focusing on.

14 CHAIRPERSON AVILÉS: Okay, got it.

15 SENIOR ADVISOR LO: There were a few other
16 job lines that we did have to cut back on as MOIA
17 grew and with some of the budget issues, but the core
18 is what we intend it to be, to both support language
19 access and language services and to have some
20 opportunities for mutual enrichment, have a language
21 lab, as we like to call it, and to advance the work
22 across the City.

23 CHAIRPERSON AVILÉS: So what, what's the
24 budget for the Language Access Hub?

2 CHIEF POLICY ADVISOR LUCERO: Thank you
3 for the questions that you sent us beforehand so I
4 have the numbers. I think a request of FY-22, we had
5 440,000; FY-23, we had 1,343,000, and I'm going to
6 just explain the tip in a second too. FY-24, 669,851;
7 and FY-25, 534,493. For FY-23, the number that I
8 provided also included our OTPS. For FY-24 and '25,
9 it doesn't because we moved away from including OTPS
10 within that. I don't have that with me, but we can
11 come back to you if you want that number as well.

12 CHAIRPERSON AVILÉS: Yeah, I guess it
13 would help to see, I guess the, the growth or the
14 decreases in the Hub.

15 In terms of, so MOIA's annual report
16 states that the office onboarded the 10 language
17 access specialists and the two project managers, and
18 you actually just mentioned in your testimony that
19 the services generally work for MOIA and the Mayor's
20 Office. Are any of those employees farmed out to
21 other agencies?

22 SENIOR ADVISOR LO: The work at MOIA, as
23 we do receive some requests from other agencies for
24 other parts of the Mayor's Offices, on occasion for
25 some other agencies, but by and large, not. We are

2 there in case there's a stopgap need or, you know,
3 sometimes, and this is one of the challenges with
4 some agency contracts, the need to turn around things
5 quickly so, on occasion, our team is able to step in
6 and support. We are trying to, now that we have the
7 team, grow both our capacity, but our internal demand
8 to make sure that we're starting to provide a broader
9 range of materials for the Mayor's Offices. Over the
10 course of the summer, we've gotten increased requests
11 to help support press release translations for City
12 Hall in particular languages so, as we grow capacity,
13 we also want to take that opportunity to drive the
14 demand for it as well.

15 CHIEF POLICY ADVISOR LUCERO: And I'll add
16 that we, as you know, we work very closely with DSS
17 on IDNYC so there is a close collaboration there. In
18 addition, our language specialists have been crucial
19 in also providing support, particularly at the
20 beginning for recent arrivals, so working in
21 conjunction with OASO and Health and Hospitals at the
22 arrival center was also sort of part of some of the
23 work that we did.

24

25

2 CHAIRPERSON AVILÉS: Thank you. I was just
3 going to, you anticipated my question, if there were
4 particular agencies that you worked more closely.

5 You noted particularly at the beginning,
6 and yet we've had a consistent flow of folks into the
7 system. Is that because, tell me why that has trailed
8 off?

9 CHIEF POLICY ADVISOR LUCERO: I would say
10 that it's not so much as trailed off as it's become a
11 bit more stable. I think initially it was a lack of
12 just needing physical bodies and people who spoke
13 languages directly with some of the recent arrivals,
14 because we were still assessing and figuring out
15 levels of literacy, for example, so I would say that,
16 but I think it's remained steady. We have a close
17 working relationship with the OASO in identifying
18 trends and new languages that come in so I would just
19 say that it's become steady in the last two years.

20 CHAIRPERSON AVILÉS: Got it. In terms of
21 the Language Access Hub team members, do they, and I
22 guess this overlaps with Local Law 6, are they at all
23 spot checking any of the work of the vendors or
24 fielding requests and doing the work themselves?

2 SENIOR ADVISOR LO: The arrival of our
3 larger team has been wonderful. We do work with
4 outside vendors for a lot of the work. For certain
5 materials, depending on the workflow, the outside
6 vendor will do the work and our team will check it.

7 CHAIRPERSON AVILÉS: They are vendors that
8 you're specifically working with as opposed to
9 outside vendors, that may be other agencies? So I'll
10 give you maybe an example. I hope this illustrates
11 what we're trying to get at. A vendor hired by DOE
12 puts forward a standard document. It's rife with
13 errors. Does MOIA find themselves or the Language
14 Access Hub find themselves like finding these
15 documents and then correcting them themselves or
16 responding to DOE that these documents are a hot mess
17 and they should be corrected?

18 SENIOR ADVISOR LO: Thanks for the
19 question. I will say that..

20 CHAIRPERSON AVILÉS: It's probably all of
21 the above.

22 SENIOR ADVISOR LO: Yeah. It hasn't been a
23 formal program to do that, but in working on MOIA and
24 City Hall materials, our team does get familiar with
25 available materials across the City and, where there

2 are issues, they will point out this is not so great,
3 and we can share some of that feedback out to those
4 agencies. Just like with any member of the public, if
5 they see some materials that are not well translated,
6 we do want to know. That can be shared to the agency.
7 It can be shared to us. We want that feedback to make
8 sure that the quality is good. I think going forward,
9 we're trying to figure out the right workflows to
10 meet our needs and also the different ways that our
11 team can help support language quality across
12 agencies. We're not formally auditing other agency
13 materials, but we are, when we can, contribute to
14 some of that feedback.

15 CHAIRPERSON AVILÉS: Got it. At a previous
16 hearing, MOIA shared that they were interested in
17 hiring two language access specialists in each
18 language. Is that still the case?

19 SENIOR ADVISOR LO: That is the case. I
20 think as we build out our team, we want to make sure
21 that we're following best practices, industry
22 standards, make sure the right tools are in place. It
23 has been a learning experience on many fronts to try
24 to grow the team. I think that's part of the
25 experience in our role of being a language lab and

2 also why MOIA may not be the best place for a
3 citywide translation team. That said, we do hope to
4 the degree that we're serving our particular needs to
5 do it in the best way possible with good linguists.
6 I'm very happy to say that I have a wonderful crew
7 and to make sure that the workflow and the technology
8 is appropriate so that we can do this cost
9 effectively and also leverage the work that they've
10 done to make sure that we're improving over time.

11 CHAIRPERSON AVILÉS: The 13 individuals
12 that are doing the translation services, they cover
13 two per each language, or will MOIA be hiring any
14 more language access hub folks?

15 SENIOR ADVISOR LO: Currently, we have two
16 linguists for four of the languages then, for five
17 languages, we have one specialist. The anticipation
18 is that over time, we'll work towards two. Where
19 appropriate, sometimes we'll send to the vendor and
20 have our language access specialist check for
21 quality.

22 CHAIRPERSON AVILÉS: Four and five is
23 nine. Are we going to hire another person to try to
24 meet that threshold? Is that in the immediate future

2 or are we holding steady? I'm sorry. I'm just wanting
3 to understand.

4 CHIEF POLICY ADVISOR LUCERO: I'll also
5 note that out of all the top 10 languages, we're
6 still looking to fill Urdu. We say this as often as
7 we can, but if you know of anybody or want to refer
8 them to us, we'll take the opportunity to just
9 advertise that.

10 I think right now, we're staying steady
11 within what we have, but as always, we're going to
12 look ahead to see if we will go back to the original
13 plan of having the pairs for the rest of the
14 languages.

15 CHAIRPERSON AVILÉS: Currently, looking to
16 fill one role specific to Urdu and then assessing
17 what the plan will be for the future? Got it. Thank
18 you.

19 Let's see. In terms of the most recent
20 annual report, lists seven languages covered by the
21 Language Access Hub, but now we're doing better, it
22 sounds like, right?

23 CHIEF POLICY ADVISOR LUCERO: Yes. Just
24 Urdu is missing.

2 CHAIRPERSON AVILÉS: Okay. Great. Let's
3 see. The Language Access Hub have Haitian Creole,
4 right? Okay.

5 CHIEF POLICY ADVISOR LUCERO: Yes.

6 CHAIRPERSON AVILÉS: Great. Does MOIA's
7 language access team work with the designated
8 language access coordinators?

9 SENIOR ADVISOR LO: Across the agencies?

10 CHAIRPERSON AVILÉS: Yeah.

11 SENIOR ADVISOR LO: No. Our specialists
12 are serving MOIA, Mayoral Office, and City Hall.

13 CHAIRPERSON AVILÉS: Got it.

14 SENIOR ADVISOR LO: On the language access
15 side, Young and Alicia and myself, we do work with
16 other City agencies.

17 CHAIRPERSON AVILÉS: Got it. Thank you.
18 Thank you for the clarification. So, how much funding
19 has MOIA received or allotted for translation and
20 interpretation services for Fiscal '22, '23, '24, and
21 '25?

22 CHIEF POLICY ADVISOR LUCERO: So, those
23 are the numbers I provided previously, and I noted
24 that for '24 and '25, OTPS is not included and I owe
25 you that number.

2 CHAIRPERSON AVILÉS: Got it. Oh, okay.

3 Thank you.. How often does MOIA convene the language
4 access coordinators and is attendance mandated and
5 can you give us a sense of what is discussed in these
6 meetings?

7 SENIOR MANAGER KWON: Yeah, definitely. As
8 mentioned in the testimony, we believe that language
9 access isn't just a checklist, but an ongoing process
10 that needs improvement, and we utilize the anchors,
11 the two anchors, the language access implementation
12 plan and the reporting as a way to convene language
13 access coordinators. So, this year was a special year
14 where most agencies had to update their language
15 access implementation plan so year-to-date, we had 12
16 overall convenings with the language access
17 coordinators. Nine of the convenings were dedicated
18 to language access implementation plan updates. So,
19 we sectioned out our plans into different sections
20 and we focused on one section in each convening,
21 sharing best practices for language access
22 coordinators to kind of cross-pollinate some of these
23 best practices together and also highlight some of
24 the practices that was really great to note from each
25 agency. We also had one orientation for newly

2 appointed language access coordinator, which we
3 covered the basics of Local Law 30, but also the
4 maturity model, how we approach language access.
5 Additionally, this month, we convened two convenings
6 around monitoring so kind of walking them through the
7 reporting process, how we are re-envisioning the
8 monitoring system and how we look towards
9 strengthening it in the next years.

10 CHAIRPERSON AVILÉS: Thank you. So, how is
11 the decision made in terms of the language access
12 coordinators? Do the agencies just tap an existing
13 employee? Are they given recommendations? Can you
14 walk us through that?

15 SENIOR MANAGER KWON: Yeah, on Local Law
16 30, it just asked agencies to designate a language
17 access coordinators to oversee the development of
18 language access implementation plan so really there's
19 no anchoring guidelines on how agencies are
20 designating language access coordinators. Currently,
21 language access coordinators are designated in
22 various different levels and different areas of
23 agencies. We hope to work with the Council to better
24 strengthen that system as well.

2 CHAIRPERSON AVILÉS: I think we talked
3 about it a little bit earlier, and there was
4 definitely a recommendation on the table. Do you have
5 other recommendations? Like I'm particularly
6 intrigued by the language access coordinators who
7 have very different roles, right, it's a combined
8 role and how resources are honestly allocated,
9 because I'm sure those are probably two completely
10 full-time jobs. If you could talk a little bit about
11 some of the recommendations and the guidance you
12 would provide around this challenge.

13 SENIOR ADVISOR LO: The language access
14 coordinator holds an interesting position within the
15 agency, needing to be able to engage with a broad
16 range of operational areas. We find that language
17 access coordinators sit in different places within
18 agencies. Some are in comms, some are in contracts.
19 We also want to make sure that it's someone who's
20 high enough so they have some pull, right, and that
21 they can focus on the work. Sometimes, well, quite
22 often, a LAC is wearing multiple hats. Sometimes
23 those hats are compatible. Sometimes those hats are
24 not so compatible. And we find that agencies, as I
25 mentioned earlier, agencies that do have a full-time

2 dedicated LAC are able to move things better and, And
3 where they have teams, even further, especially in
4 their ability to engage across different silos within
5 the agency and, again, this varies depending on the
6 size of the agency as well.

7 CHAIRPERSON AVILÉS: Sure. Is there
8 remuneration for taking on the role of language
9 access coordinators, particularly in those instances
10 where they're sharing multiple?

11 SENIOR ADVISOR LO: No, there's not, and I
12 think this actually goes back to some of the history
13 in Local Law 30. I think it was one of our
14 recommendations back then to have a dedicated LAC,
15 but that also, of course, requires a specific job
16 line within agencies. We found that over the course
17 of the years, certain agencies have, on their own,
18 expanded a particular role for language access
19 coordinators. TLC comes to mind. DOC is, Corrections,
20 is posted for a full-time LAC. As agencies understand
21 the breadth of responsibilities in moving language
22 access forward, some of them are doing that
23 independently. I think it's something that we think
24 should be part of the obligations set forth in the
25 law.

2 CHAIRPERSON AVILÉS: Got it. In terms of
3 the implementation around the language access plans,
4 are agencies required to reach out to MOIA? I'm
5 trying to understand a little bit of the information
6 flow. You mentioned the convenings. Are there
7 periodic check-ins? Are you receiving more input than
8 you can respond to? Can you describe a little bit of
9 that for us?

10 SENIOR MANAGER KWON: Thank you so much
11 for that question. They're not required to seek our
12 help, but we do reach out to them proactively
13 throughout these two anchors, as we mentioned. We do
14 want to make sure that language access is taken
15 seriously and is the forefront of City agencies. We
16 do proactive outreach. We provide tailored guidance.
17 We provide broad guidance, but also tailored
18 technical assistance. Convening is one of the
19 touchpoints, but also our targeted outreach is
20 another way we enhance those touch points.

21 CHAIRPERSON AVILÉS: Okay. Let's see. You
22 mentioned this a little earlier, the work with the
23 CBOs. Certainly, they scream on the chart of
24 contracted vendors. Of the 135, there is one that
25 lists a bunch of community-based organizations. Can

2 you talk to us about the CBOs that were identified to
3 provide language access and what languages are
4 included in that?

5 SENIOR MANAGER KWON: Yeah, definitely.
6 From the Local Law 6 report, we have identified
7 several CBOs who have the potential foundation to
8 deliver language services. We also identified some
9 CBOs who have potential capacity to provide our
10 supplemental language services as well. With those
11 two groups, we have conducted focus groups after the
12 first report is out, and we are really excited to
13 share our second report with you all in the coming
14 weeks. The first focus group that has the potential
15 capacity to provide language services, we identified
16 five CBOs. Those are APNA, Brooklyn Community Center.
17 They provide Urdu, Punjabi, Bengali, Pashto, Dari,
18 Spanish, Tamil, Uzbek, Turkish, and Ukrainian. Second
19 is Gongming Collective. They provide language
20 services in Chinese, both in translation simplified
21 and traditional. For interpretation, they provide
22 Cantonese, Mandarin, Fujianese, Taishanese as their
23 dialects. Next is the Refugee Translation Project.
24 They provide services in Arabic, Bangla, Burmese,
25 Chinese, Dari, Persian, French, German, Greek,

2 Haitian Creole, Hindi, Hmong, Khmer, Kurdish, Pashto,
3 Portuguese, Punjabi, Russian, Somali, Spanish,
4 Swahili, Swedish, Tigrinya, Turkish, Ukrainian, and
5 Urdu. Fourth is the International Child Program.

6 CHAIRPERSON AVILÉS: They're doing better
7 than New York City. What is happening here? I'm
8 having a problem.

9 SENIOR MANAGER KWON: The International
10 Child Program provides Wolof, Pulaar, Soninke,
11 Hassania, French, and Arabic. And lastly, the
12 Transnational Village Network, Red de Pueblos. They
13 provide services in Mixteco, Nahuatl, Malinaltepec,
14 Mam, Mes (phonetic), Kicha (phonetic), K'iche',
15 Garifuna, Kaqchikel, Totonac. So these are languages
16 that they have identified in the survey as what they
17 provide as language services.

18 CHAIRPERSON AVILÉS: And so the next
19 report is going to be coming out. Can you give us a
20 preview of what the next steps are? How we're
21 activating all this exciting capacity?

22 SENIOR MANAGER KWON: Yeah, in the second
23 report we conducted the two focus groups and really
24 hone in on how we can collaborate with the CBOs
25 moving forward. We kind of narrowed down a little bit

2 on our strategy in our collaboration. One of the most
3 exciting areas that we wanted to highlight is we are
4 exploring launching the request for information with
5 the Commission of Civic Engagement and the Commission
6 of Racial Equity. We are hoping to invest in the
7 CBOs' capacity in this front and also leverage some
8 of their strength in this area. So, once the RFI
9 launches, we welcome any CBOs to respond to those. We
10 are also exploring ways to establish language access
11 training fund. We have heard from, in the focus
12 group, that CBOs are providing trainings. There are
13 interested bilingual and multilingual community
14 members in this field. However, there's no investment
15 in the training for the CBOs to do this work so we
16 are looking into ways we can help invest in this
17 area.

18 CHAIRPERSON AVILÉS: So in terms of an
19 organization like, I'm just going to pick one with an
20 impressively long list. I think it was the Refugee
21 Translation Project. Can you help me understand what
22 their current capacity is with such an incredible
23 long, what does it mean to be able to speak 28
24 languages?

2 SENIOR MANAGER KWON: Yeah. So, Local Law
3 6 required us to assess CBOs based on the language
4 service industry so we looked at ISO and ATSM as like
5 a language service standard that we are looking into
6 how to assess these organizations so one of those are
7 project management and coordination, do they have
8 robust project management to deliver the services
9 that they're requested? Do they have enough trainings
10 for the linguists in-house or otherwise external
11 trainings for the linguists to be developed and
12 continue to do this work? These are some of the areas
13 that we looked into the survey. The survey was quite
14 robust. So, based on those survey findings, we really
15 tried to narrow down to ensure that we're assessing
16 CBOs capacity.

17 CHAIRPERSON AVILÉS: So, in terms of like,
18 I guess just take capacity for training linguists, so
19 when an organization lists 28 languages, you're
20 assessing whether they actually have capacity in-
21 house to be able to manage each of those 28
22 languages. Are you prioritizing the 10 citywide? How
23 are you kind of assessing that?

24 SENIOR MANAGER KWON: Yeah. For the
25 selected CBOs, we did look at the languages because

2 we were interested in some of the emerging language
3 needs. However, we did want to focus on the language
4 industry standards as well. So, for example, for a
5 Refugee Translation Project, they had a way of
6 selecting their interpreters and translators. They
7 made sure that they're hiring a linguist who had
8 previous experience as linguist and education level
9 that requires that form of work so we thought that
10 was kind of on par with the standard that we were
11 looking for.

12 CHAIRPERSON AVILÉS: Got it. That's very
13 helpful.

14 Okay, we're going to switch and skip a
15 little. The report noted that DSNY had developed a
16 database of translated materials. How often are
17 agencies translating in-house versus contracting out?
18 Do you have a sense of that?

19 SENIOR ADVISOR LO: By and large, we would
20 say that agencies are contracting out. The expansion
21 of our team is something that some agencies might
22 look into but, at the current time, I would say only
23 MOIA and the Health Department really have teams with
24 embedded linguists for translation.

2 CHAIRPERSON AVILÉS: Yeah. I was surprised
3 to see the amount of underspending of some of the
4 DOHMH contracts in terms of the variety of them. It
5 was just so surprising. We know there is a need and
6 we consistently hear, particularly in medical
7 settings and in healthcare broadly, the lack of, and
8 to see a million-dollar contract with only 200,000
9 dollars of spending and we hear on a daily basis
10 there are still service gaps. What do you make of
11 that?

12 SENIOR ADVISOR LO: Thanks for the
13 question. I think there's the procurement side and
14 there's the demand side. Just having experience
15 procuring, the agency wants to make sure it has the
16 capacity and will go for a larger contract. The
17 actual demand, it's basically sort of a blanket so
18 for future use and preferences to have a longer
19 contract so you don't have to go through the
20 procurement cycle.

21 CHAIRPERSON AVILÉS: Yeah. Obviously, the
22 contracts are procured. They have a value set
23 proposition and what they're showing is in the last
24 fiscal year only expending a very small amount of the
25 value of the contract and yet we all know, I think we

2 can agree that demand, the volume has increased
3 significantly across all languages and we hear
4 certainly anecdotally from partners, from residents,
5 from our own individual experiences that there's
6 still a lot of gaps so I'm trying to make sense of
7 why these services are not being utilized fully. I
8 would expect that delta to be much smaller across
9 contracts with particular agencies where you know
10 there's a lot of interface. That was just a
11 surprising thing that I noted. I'm just curious how
12 you make a determination around what you're seeing
13 there.

14 SENIOR ADVISOR LO: I think that is one
15 area that as we engage more with the expenditure side
16 and with the monitoring side that we can have more
17 information on how to examine that nexus. At the
18 moment, I do not have a good answer on that
19 particular piece because we have not had the capacity
20 to do that.

21 CHAIRPERSON AVILÉS: That's fair. I was
22 trying to make sense of the world when you read the
23 report so I hear that.

24 In terms of, excuse me one quick second.
25 I think you may have noted this earlier so forgive me

2 if I didn't catch it, but did you say you were
3 developing some kind of dashboard or database around
4 tracking across?

5 SENIOR MANAGER KWON: Yeah. As mentioned,
6 we would love to work with the Mayor's Office of
7 Operations to develop concrete measurements and
8 metrics around language access. We really honor and
9 value transparency so we would want to make these
10 data public in the future. We would love to
11 collaborate to strengthen the monitoring system.

12 CHAIRPERSON AVILÉS: I appreciate your
13 love for it, but what I'd like to know is this
14 actually something that is being pursued in earnest?

15 SENIOR ADVISOR LO: As mentioned, this
16 relationship with Operations is developing. The first
17 step is taking a look at the existing MMR metrics and
18 seeing where language access directly fits in beyond
19 the specific metric on interpretation. That's the
20 beginning, but this is a deliberate focus on engaging
21 around those metrics. We have started to collaborate
22 more directly around the Local Law 30 monitoring,
23 about what that looks like. There's collaboration too
24 on delivering upon that, engaging with the agencies.
25 Those two threads together are leading towards the

2 basics around a dashboard, certainly internally where
3 we can build that out in conjunction with MMR to make
4 it more public. We'd like to do so. We look at
5 examples from other cities where they do have some
6 public information on dashboards and want to be able
7 to have that kind of transparency and to advance
8 language access.

9 CHAIRPERSON AVILÉS: I am a huge proponent
10 of transparency, that's for sure, but making sense of
11 the data and having accessible data is really
12 important. Obviously, you're collaborating and
13 exploring. Have you developed a work plan that
14 determines any milestones over the next two years on
15 what you'd like to see happen? If you could talk a
16 little bit more specifically about that.

17 DIRECTOR STEINBERG: Thank you. Just to
18 recognize Francisco Navarro next to me who's run the
19 last program, which is the Secret Shopper Program,
20 which is our most immediate contribution to the work
21 aside from the general compliance oversight and the
22 technical assistance when needed. I just want to
23 point out that we really do believe in transparency
24 as a sort of engine toward improvement. I really want
25 to credit Francisco. He's run the last program, but

2 the City had never published its data until we did
3 proactively and without any reporters noticing or
4 Council Members or lawyers. We determined that it was
5 not only subject to the Open Data Law, but that
6 without the public having information around which
7 sites fell short on which criteria, then there wasn't
8 the ability for the public to hold the City
9 accountable. In fact, when reporters or the Council
10 have data points, like only 60 percent had signage,
11 we're proud to have put that data into the world. We
12 know that sort of transparency is politically
13 challenging but required for improvement. That's all
14 to say that we've just started to really formalize
15 our data practices around this work. The first step
16 was creating a predictable, complete file for the
17 public to access in Open Data. From there, we have
18 the ability to really use this data as a basis for
19 analysis and for performance management. We're very
20 excited to have taken that step forward.

21 CHAIRPERSON AVILÉS: We're excited to
22 fuddle with that data.

23 Can you explain for the record the
24 respective roles of the Mayor's Office of Operation

2 and MOIA pertaining to the Office of the Language
3 Service Coordinator?

4 DIRECTOR STEINBERG: Sure. It's not an
5 obvious division of labor. Part of that reflects the
6 evolution of these responsibilities. Ops worked on
7 translation issues far before any of these local laws
8 existed. I'm not allowed to tell you, enter into the
9 record, Francisco's full history on these issues, but
10 Francisco is a huge source of institutional knowledge
11 and has helped the City adapt to new technologies and
12 practices over the years. The way that we approach
13 this sort of collaboration is that MOIA are the
14 subject matter experts. They have dedicated staff to
15 work on these issues. Operations has both a formal
16 responsibility to ensure compliance, but it's really
17 the fact that we have the tools and the citywide
18 purview and the mission to institutionalize these
19 practices, as you've said and MOIA has said, and to
20 look for any opportunity to institutionalize the
21 criteria in these local laws. Our most material
22 contribution is that we run the Language Access
23 Secret Shopper Program, which is a way to get
24 snapshot, firsthand insights into customer service at
25 the customer-facing sites. It's obviously a method of

2 testing the quality of services based on objective
3 criteria. The objective is to find gaps, to flag and
4 escalate them. We meet with the agencies afterward,
5 and if we have to escalate beyond that, that's
6 certainly part of our performance management
7 protocols. As I mentioned, this data is now in the
8 public realm, and so we really do hope that it's a
9 tool that everybody from the Council to advocates to
10 agencies use as a way to have some mutual
11 accountability and some shared insights into where we
12 are, but I should stress that it really is a Secret
13 Shopper Program and not an inspection program.
14 Obviously, the Secret Shoppers don't have the ability
15 to enforce anything, and the purpose really is to
16 sort of reveal problems. It's not the same as a
17 comprehensive audit, but I do think it brings a lot
18 of value to the work.

19 CHAIRPERSON AVILÉS: Yeah, I think we've
20 established for the record there is no formal
21 auditing and there is no enforcement mechanism here,
22 although you did say ensure compliance.

23 DIRECTOR STEINBERG: Compliance with the
24 very straightforward enforceable components of it,
25 which are to designate a, right..

2 CHAIRPERSON AVILÉS: Got it.

3 DIRECTOR STEINBERG: There are components
4 of it that are very straightforward and required, and
5 there are other components that are suggested and
6 recommended, and I do think some clarity around the
7 difference is productive, but I hear you, and
8 compliance is something we take seriously, which is
9 probably why I'm being so literal.

10 CHAIRPERSON AVILÉS: In terms of, so we
11 know historically that the Office of Language Service
12 Coordinators has provided the guidance for the
13 agencies, advised and assisted the Mayor and the
14 Council in developing implementation policies
15 designated to assist immigrants and other foreign
16 language speakers in the city, and periodically has
17 updated the list of designated citywide languages.
18 Are these still the main functions of the Office of
19 Language Service Coordinator?

20 DIRECTOR STEINBERG: That's me, I guess.
21 No, I think I might need you to repeat it. I thought
22 you were describing something else, but do you mind?

23 CHAIRPERSON AVILÉS: I'm happy to, or you
24 could just tell me what are the main functions of the
25 Office of Language Service Coordinator.

2 DIRECTOR STEINBERG: Yeah, no, I think
3 that is consistent, although it just, you know, the
4 real world now reflects that we have an entire office
5 with the expertise and capacities to push these
6 issues forward, but you know, again, our interest in
7 staying involved with this work isn't just because of
8 the legal responsibility to do it, it's because we do
9 have the purview and the sort of access to City
10 leadership and the responsibility of operationalizing
11 these values, and so we're very committed to this
12 work, and we know that equitable service delivery is
13 predicated on the ability of the City to translate
14 and interpret at scale.

15 CHAIRPERSON AVILÉS: So, can you give us
16 maybe like some examples, just like concrete examples
17 of where you've provided this advice and assistance
18 to move forward?

19 DIRECTOR STEINBERG: Yeah, there's
20 different sort of...

21 CHAIRPERSON AVILÉS: You don't want to
22 talk to me?

23 DIRECTOR STEINBERG: Well, there's...

24 CHAIRPERSON AVILÉS: You've invested so
25 much time. We need to hear your voice.

2 SENIOR POLICY ADVISOR NAVARRO: The recent
3 contributions that we make to language access is
4 through the Language Access Secret Shopper program,
5 right, so we identify gaps, as you've noted. We do
6 tell the agencies what we found and the expectations
7 is that they will correct them. We find particular
8 issues that need to be escalated. We do that.
9 Historically, when the Office of Language Service
10 Coordinator was in the Office of Operations, we
11 literally had, I think, four interpreters. I remember
12 a Spanish one and a Chinese one, and they were doing
13 interpretations and I think mostly translations of
14 documents, not interpretations. When Mayor Bloomberg
15 created the Mayor's Office of Immigrant Affairs, all
16 that was moved over to MOIA, and when the Office of
17 Language Services Coordinator was within operations,
18 I really was not involved in that, so I can't speak
19 to like what specific ways it may have met the
20 requirements. MOIA started. The first Director was, I
21 think, Guillermo Linares way back then, and, you
22 know, we took over the Language Access Secret
23 Shopper, and it's also part of the Citywide Customer
24 Service Initiative that was started back in 2008 by
25 Mayor Bloomberg.

2 CHAIRPERSON AVILÉS: Do you think the
3 structure makes sense? Would you make any
4 recommendations around how to shift the structure to
5 respond to current needs and context?

6 SENIOR POLICY ADVISOR NAVARRO: I mean I
7 think there may be ways for us to strengthen the
8 Secret Shopper Program. We've had discussions in the
9 past about, you know, right now it's basically summer
10 interns who come and do this over the summer. We are,
11 you know, somewhat limited by who decides to apply
12 for, you know, the internships, so the languages that
13 we get that we can test might be limited in a
14 particular year. They tend to be younger. There may
15 be certain locations that they're not, you know, they
16 would stand out, so we've had discussions about
17 incorporating, you know, the MOIA staff more into
18 doing secret shopping to strengthen the Secret
19 Shopper, you know, Program.

20 DIRECTOR STEINBERG: I do want to plug it
21 as an internship program, though, also. It really
22 does give young New Yorkers exposure to the front
23 line of City services, and many of those interns come
24 from immigrant families themselves, and it can be a
25 very powerful experience, and I think one of our

2 former interns is currently one of the language
3 coordinators at an agency.

4 SENIOR POLICY ADVISOR NAVARRO: Yeah, at
5 TLC.

6 DIRECTOR STEINBERG: At TLC, so it is a
7 rich program, but Francisco's, you know, obviously
8 right that it could be professionalized if approached
9 differently.

10 CHAIRPERSON AVILÉS: Are you able to hire
11 undocumented young people to participate in the
12 program?

13 SENIOR POLICY ADVISOR NAVARRO: What was
14 the question?

15 CHAIRPERSON AVILÉS: Are you able to hire
16 undocumented young people to work the program?

17 SENIOR POLICY ADVISOR NAVARRO: I don't
18 know.

19 CHAIRPERSON AVILÉS: As interns.

20 DIRECTOR STEINBERG: I don't know the
21 answer to that question. We don't as an office
22 inquire about their status, but I can follow up to
23 see if there's any kind of citywide or City Hall
24 policies there.

25

2 CHAIRPERSON AVILÉS: Sure. In terms of the
3 Office of Language Services, and I may be, now I'm
4 feeling brain dead, how many people are employed at
5 the Office of Language Services?

6 DIRECTOR STEINBERG: At Operations?

7 CHAIRPERSON AVILÉS: Yeah.

8 DIRECTOR STEINBERG: It's really just one
9 and a half people. Again, it's somewhat of a vestige
10 of the sort of former..

11 CHAIRPERSON AVILÉS: Got it.

12 DIRECTOR STEINBERG: Regime that was
13 responsible for all interpretation translation work.

14 CHAIRPERSON AVILÉS: Okay. Okay. Thank
15 you. And are agencies reaching out to the office?

16 DIRECTOR STEINBERG: We reach out to them
17 a lot, but go ahead.

18 SENIOR POLICY ADVISOR NAVARRO: I mean, I
19 think agencies reach out more to MOIA because again,
20 the core functions have been transferred to MOIA.

21 CHAIRPERSON AVILÉS: Got it. So really
22 the, the main function of this office is the Secret
23 Shopper Program.

24

25

2 SENIOR POLICY ADVISOR NAVARRO: Yeah, and
3 assisting sometimes with technical aspects of the
4 language implementation plan.

5 CHAIRPERSON AVILÉS: Got it. Okay. Thank
6 you.

7 Has MOIA assessed the top 10 languages of
8 the city and has that changed?

9 SENIOR ADVISOR LO: This is a timely
10 question in particular, in conjunction with the other
11 possible adjustments to Local Law 30. On an annual
12 basis, we do take a look at the languages we use
13 based on the Local Law 30 rubric, information from
14 the census and information from DOE, a five-year
15 running average, LEP languages on the census side,
16 and then five-year running average of parent
17 preferred languages in the home language information
18 survey from DOE. For many years, it was very
19 consistent and recently demographic changes is
20 showing pushing up certain languages so I think the
21 core message here is that we want to collaborate with
22 Council to address both the timing and the structure
23 of the designation of languages. As mentioned,
24 there's been also a lot of movement on the State
25 front so they've designated 12 languages by straight

2 census data. I think it's a value to ensure that
3 there's some consistency in how these are determined.
4 No one knows what's a State document versus a City
5 document sometimes so we want to revisit both the
6 rubric and also be more specific around the frequency
7 of revisiting and designating languages.

8 CHAIRPERSON AVILÉS: And is there a
9 timeframe when you will complete that assessment and
10 designation?

11 SENIOR ADVISOR LO: I think that is the
12 crux of the issue with language and Local Law 30. The
13 law does not specify when languages need to be
14 redesignated. State law says every two years. Local
15 Law 30 does not designate a timeframe.

16 CHAIRPERSON AVILÉS: Right, but you know
17 that the State is on a different trajectory and has
18 identified 12. We've been stuck on 10. We're looking
19 at the data. Are we going to land somewhere at some
20 point or are we just going to continue to say the law
21 doesn't stipulate a finite date so we're just going
22 to be in limbo?

23 SENIOR ADVISOR LO: I think we would like
24 to get clarity into the law so that we can do that.

2 SENIOR ADVISOR LO: So you don't think the
3 City should make a determination whether the 10
4 languages remain the designated languages? We should
5 continue on or that needs to be revisited because the
6 data is telling you something different and the State
7 has, you know, expanded that.

8 SENIOR ADVISOR LO: I think, we want to
9 follow Local Law 30, the languages. Certainly, it's
10 an established baseline for the most commonly
11 distributed documents. This will be the first time
12 that there would be a change, and we want to take the
13 opportunity to sort of rectify or take the
14 opportunity to align with other designations which
15 were not in place at the time of Local Law 30's
16 passage (INAUDIBLE) to support any transition to a
17 more sort of effective way.

18 CHAIRPERSON AVILÉS: Okay. I think we're
19 on similar, we're on parallel tracks. What I'm
20 hearing is you are working to align but you have no
21 definitive timeframe with which to make that
22 designation because the law does not require you to
23 do so. Is that correct?

24 SENIOR ADVISOR LO: Yes, that's correct.
25 The law doesn't require when to...

2 CHAIRPERSON AVILÉS: So you're not
3 defining a date because the law has not told you a
4 specific date, but you're working on alignment with
5 an indefinite timeframe.

6 SENIOR ADVISOR LO: Well, as mentioned
7 previously, there are a number of aspects to Local
8 Law 30 that we would love to discuss with Council to
9 get...

10 CHAIRPERSON AVILÉS: We've got to be
11 really specific and make sure we put in timeframes
12 because agencies can't determine that on their own. I
13 understand. Okay.

14 Last question.

15 CHIEF POLICY ADVISOR LUCERO: If I may
16 just add.

17 CHAIRPERSON AVILÉS: Please.

18 CHIEF POLICY ADVISOR LUCERO: You know,
19 I'll say that because the law and the way that it was
20 written also emphasizes the fact that each agency per
21 se evaluates interactions with different types of
22 groups and folks who interface with them. Although we
23 have these top 10 languages that have existed,
24 agencies on their own have, through the support of
25 MOIA, through the support of Ops, have expanded to

2 not just the top 10. There's a number of them. But to
3 the point that you're making, I think that, and what
4 we're saying is, yes, the law doesn't indicate a
5 timeframe. However, we are evaluating, given some of
6 the changes that have happened, (INAUDIBLE) proximity
7 to the work that we're doing right now. I can sit
8 here and say that I think that we hope to do more
9 within the year. I also know that Council itself has
10 pushed the City with Local Law 13 in particular with
11 the temporary languages, but that's sort of where we
12 are in this regard, that although the law doesn't
13 speculate how quickly those plans are updated,
14 agencies on their own have already expanded that, but
15 we are working on alignment in regard to some of the
16 other metrics that have been provided by the State,
17 for example.

18 CHAIRPERSON AVILÉS: Yeah. No, thank you
19 for that. I mean, I think, you know, it's landing the
20 plane, right? If the Mayor's Office of Immigrant
21 Affairs, who's moving this forward, can't figure out
22 its designation, and when it re-ups the designation
23 in concrete terms, and agencies are all over the
24 place, and we still have gaps, we still have this
25 very helter-skelter context that, you know, we need

2 to ground somehow and we need to say, we've looked at
3 our assessments, we've looked at the context. Given
4 what we know, the State did it. Why can't we land the
5 plane and say we reaffirmed these are designated
6 languages for now, given this constant state of
7 assessment and not knowing because the law did not
8 stipulate the agency should land the plane feels very
9 unsettling in the context.

10 DIRECTOR STEINBERG: I agree in the sense
11 that, of course, the City should take the initiative
12 of when possible. I do wonder if it, you know, what
13 the DCP population division would say about the
14 methodology that was used, which, you know,
15 originally, and whether it's problematic to replicate
16 it, given the political kind of nature of the last
17 census.

18 CHAIRPERSON AVILÉS: Fair point. And those
19 are the kinds of assessments we'd like to see, like
20 what is happening, what is the thinking, and how do
21 we get to that place within a timeframe, you know.

22 DIRECTOR STEINBERG: Absolutely.

23 CHAIRPERSON AVILÉS: Q1, Q4 of '25, we are
24 going to land the plane because these are important
25

2 questions that we need to respond to so I appreciate
3 that.

4 So, I want to ask one last question, and
5 then open for public testimony for those who remain
6 and have been so patient, I thank you all.

7 In terms of in relation to the
8 legislation that Council Member Hanif has put
9 forward, you mentioned some practical learnings
10 around why you do not agree with the legislation. Can
11 you explain that more fully for the record?

12 SENIOR ADVISOR LO: Sure. Thank you for
13 the question, and it is where we want to be able to
14 benefit from our efforts to try to do something
15 similar, which the expansion of the team was intended
16 for many of the same reasons why I believe that the
17 legislation is put forward. So, MOIA is one of the
18 Mayoral Offices. We have limited internal headcount.
19 We don't have a strong procurement infrastructure. In
20 addition to having in-house linguists, contracting is
21 a particular critical piece of setting up a team to
22 deliver language services. The job lines that we need
23 need to be stable. I think MOIA itself has a five
24 headcount. All the other lines come from other
25 agencies. So, in terms of setting up a stable

2 infrastructure for a dedicated service and a team,
3 the Mayor's Office, you know, we're happy to build
4 out the capacity to serve our needs in other Mayor's
5 Offices and to further explore what we could support,
6 but in terms of a citywide office, that's maybe
7 difficult. And we don't have, I think a lot of the
8 resources that a full City agency has, including, I
9 think, we need a lot of systems in place, a lot of
10 increasingly technological support to make sure that
11 such a team is delivering and taking advantage of the
12 advancements in language technology.

13 CHAIRPERSON AVILÉS: Can you expand a
14 little bit on that piece, too?

15 SENIOR ADVISOR LO: Sure. So, you know, a
16 critical piece of a translation interpretation team
17 is the linguists, of course, but as an operation that
18 delivers language services, there's a critical piece
19 for project management, a critical piece for the
20 linguistic systems in which translators work to work
21 more effectively and efficiently. In the past,
22 there's certainly the core of what are called
23 computer-assisted translation tools, which are
24 effectively large databases of previously translated
25 content that make it easier for linguists to reuse

2 previously translated material to make sure it's more
3 consistent, we're not spending time and money on
4 translating things that don't need to be
5 retranslated. And now, with the advent of more
6 language technology that, as you know, is rapidly
7 developing, we would want to make sure that we could
8 be ahead of the game or at least cognizant of a
9 roadmap forward rather than re-creating what had been
10 practiced in the past so all of these things go
11 towards needing an appropriate home for such an
12 effort and figuring out what that office would
13 deliver internally versus outsourcing. Again, to one
14 of the points we discussed earlier, there's much more
15 of a need to think about how the City is delivering
16 content in audiovisual forms, and that's certainly
17 something that's a challenge for us and would be a
18 challenge for anything seated in our office.

19 CHAIRPERSON AVILÉS: Thank you very much.
20 That really helps bring a little more clarity around,
21 you know, kind of the statements around the practical
22 experience. It's hard to discern, and you live in
23 this world daily so that's very helpful to the record
24 to understand.

2 I think with that, I thank you all for
3 the time and the work that you're doing and your
4 patience and being here with us today and your
5 commitment to language access for the city so I thank
6 you.

7 SENIOR ADVISOR LO: Thank you very much.

8 CHAIRPERSON AVILÉS: Thank you.

9 SENIOR ADVISOR LO: And I will wish you,
10 as a closing statement, I wish you a happy
11 International Translation Day, which is next Monday.

12 CHAIRPERSON AVILÉS: Great. I hope to see
13 it in definitely the 10 languages.

14 SENIOR ADVISOR LO: Take a look at your
15 social media.

16 CHAIRPERSON AVILÉS: Thank you so much. I
17 appreciate it.

18 Now I open the hearing for public
19 testimony. I remind members of the public that this
20 is a government proceeding and that decorum shall be
21 observed at all times. As such, members of the public
22 shall remain silent at all times.

23 The witness table is reserved for people
24 who wish to testify. No video recording or
25 photography is allowed from the witness table.

2 Further, members of the public may not present audio
3 or video recordings as testimony, but may submit
4 transcripts as such to the Sergeant-at-Arms for
5 inclusion in the hearing record.

6 If you wish to speak at today's hearing,
7 please fill out an appearance card with a Sergeant-
8 at-Arms and wait to be recognized. When recognized,
9 you will have three minutes to speak on today's
10 oversight hearing topic, Assessing the Mayoral
11 Administration's Compliance with Local Law 30 of 2017
12 or on Introduction 215.

13 If you have a written statement or
14 additional written testimony you wish to submit for
15 the record, please provide a copy of that testimony
16 to the Sergeant-at-Arms. You may also email written
17 testimony to testimony@council.nyc.gov within 72
18 hours of the close of this hearing. Audio and video
19 recordings will not be accepted.

20 For in-person panelists, please come to
21 the table once your name has been called, and now we
22 will call our first panel.

23 First, we'll have Kelly Cho, Adama Bah,
24 Riva Shang, and Lloyd Feng.

25 If you would like to start.

2 LLOYD FENG: Good afternoon. My name is
3 Lloyd Feng from CACF, the Coalition for Asian
4 American Children and Families, where I serve as Data
5 Policy Coordinator for our Invisible No More
6 campaign. Thank you very much, Chair Avilés, for
7 holding this hearing and providing this opportunity
8 to testify.

9 CACF appreciates the stated aims of Local
10 Law 30 to ensure that all New Yorkers have access to
11 language services, interpretation, translation, etc.,
12 in order for them to fully communicate with and
13 receive services from New York City agencies. We
14 share Chair Avilés' and the Committee on
15 Immigration's interest in understanding the quality
16 of implementation across all agencies, especially
17 with regard to language access trainings to agency
18 staff, lessons learned between agencies, and how
19 agencies intend to address challenges that persist.
20 In addition, CACF is particularly concerned about how
21 agency implementation of Local Law 30 is considering
22 the reach of existing agency language access
23 policies, service delivery, and staff in relation to
24 the needs of Asian asylum seekers in New York City,
25 especially individuals and families who are not part

2 of the DHS or DSS shelter system. CACF's larger
3 concern about the existing implementation of Local
4 Law 30 is the lack of contextualization of language
5 data collected by agencies. For almost 15 years,
6 CACF's Invisible No More campaign has advocated for
7 Asian New Yorkers' needs to be better understood by
8 pushing government agencies to collect and report
9 disaggregated ethnicity data on our communities.
10 Agency officials often shared with us that ethnicity
11 data was redundant, since agencies could just rely on
12 language data as a proxy for ethnicity, but we know
13 that language data alone cannot tell the full story
14 of who our communities are and what their needs are,
15 especially as, over time, future generations increase
16 utilization of English as their primary language,
17 thereby rendering language data increasingly
18 misleading and inaccurate. As such, CACF calls on the
19 New York City Council and New York City agencies to
20 update agency guidance on language data collection,
21 reporting, and use so that agencies incorporate
22 ethnicity data collection and reporting when agencies
23 are determining where a community is, who makes up
24 the community, what the community's needs are, and
25 how best to serve them. Thank you.

2 CHAIRPERSON AVILÉS: Thank you so much.
3 We'll move through the testimony and maybe ask
4 follow-up questions. Thank you.

5 KELLY CHO: Good afternoon. My name is
6 Kelly Cho, Community Outreach Associate at the Korean
7 American Family Service Center, and I'll be
8 testifying today on behalf of KAFSC and the
9 collective, a coalition of gender-based violence
10 organizations serving immigrant communities
11 throughout the five boroughs that also includes Sakhi
12 for South Asian Survivors, Sauti Yetu Center for
13 African Women and Families, Violence Intervention
14 Program, and Womankind.

15 KAFSC is an organization dedicated to
16 empowering immigrant survivors of gender-based
17 violence through comprehensive services. Our clients,
18 many of whom are Korean-speaking immigrants with
19 limited English proficiency, often face barriers in
20 accessing vital City services due to language
21 limitations. KAFSC and the members of the collective
22 work directly with survivors of domestic violence,
23 sexual assault, and human trafficking, many of whom
24 face significant language barriers when assessing
25 services. In addition to engaging with the City to

2 assess services through 3-1-1, 1-800-621-HOPE, and
3 Family Justice Centers, individuals impacted by
4 gender-based violence are often referred to and
5 receive services from organizations like KAFSC and
6 the members of the collective as we have dedicated
7 multilingual staff. The individuals our organizations
8 serve often speak little or no English and rely on us
9 to navigate complex systems from law enforcement to
10 housing, healthcare, and the courts. We fully support
11 Introduction 215, which establishes an Office of
12 Translation and Interpretation within the Office of
13 Immigrant Affairs. This would be a vital step toward
14 ensuring language access for all immigrant
15 communities, including those we serve. Along with
16 this bill, we recommend the Mayor's Office's Language
17 Services Team to create consistency among translation
18 contractors and expand the languages the translation
19 and interpretation services are offered in. We also
20 recommend providing funding for non-profits to also
21 ensure they are able to translate documents and
22 communicate with constituents themselves. Thank you
23 for your time and consideration.

24 ADAMA BAH: Good afternoon, Councilwoman,
25 and thank you for the opportunity to speak today. My

2 name is Adama Bah, and I'm an Executive Director and
3 Founder of Afrikana, a Black-led organization
4 dedicated to serving Black immigrant communities here
5 in New York State.

6 I am here today to bring attention to the
7 urgent growing needs of black migrants in the city.
8 These are people who have fled unimaginable trauma,
9 violence, and persecution seeking refuge in the USA,
10 but the reality they face is one of systematic racism
11 and neglect and the lack of culturally competent
12 services. I want to leave you with three powerful
13 examples to reflect the truth of what is happening.
14 First, black migrants are not just numbers in the
15 systems. They are mothers, fathers, and children who
16 have fled unimaginable trauma and deserve culturally
17 competent trauma-informed support, not just a roof
18 over their head. It's not enough to provide shelter
19 without recognizing the mental and emotional scars
20 these individuals carry. We have seen the toll that
21 war, persecution, and forced migration take on these
22 families, yet the City's current systems are not
23 equipped to address their deep psychological need.
24 Second, language access is not simply about
25 translation or interpretation. It's about

2 understanding the cultural nuances and differences
3 that shape how people express their needs, heal, and
4 navigate trauma. The City must recognize and invest
5 in this reality. While some migrants speak French,
6 Wolof, or Pulaar, there are countless others who
7 speak Somali, Lingala, or Jula. I want to reiterate
8 the critical issue. The City's language line is not
9 working effectively for black migrants. The focus has
10 been almost exclusively on West African languages
11 like French and Wolof, but this leaves out countless
12 migrants from East and Central Africa who speak
13 languages such as Somali, Swahili, and Lingala. Even
14 when translation or interpretation is available, it's
15 not just about understanding the words. What's
16 missing is a deep understanding of the cultural
17 context behind these words. Without this, even the
18 best-intentioned services fall short, and our
19 communities continue to suffer in silence. Without
20 this, black migrants are left isolated,
21 misunderstood, and underserved. Finally, Afrikana is
22 stepping in where the City has fallen short for free,
23 but we cannot do this alone. We need the City to
24 provide meaningful, culturally-expanded language
25 access and acknowledge the full diversity of African

2 migrants in this city. At Afrikana, we are on the
3 ground every day translating, providing mental health
4 support, and helping people navigate complex systems,
5 but this burden cannot be carried by a volunteer-led
6 organization alone. We need systematic change, and we
7 need it now. Afrikana has trained hundreds of black
8 migrants who speak different languages, including
9 English, to be translators and interpreters, and we
10 are expanding our training. The solution is out
11 there. It's just not being implemented by the people
12 with knowledge and experience. Thank you for your
13 time, and I urge us all to act with urgency and
14 compassion for black migrants in the city who need
15 your support. Thank you.

16 RIVA SHANG: Thank you, Chair Avilés and
17 the Committee on Immigration, for inviting us to
18 testify. My name is Riva Shang, and I coordinate
19 Small Business Support Programs at the Asian American
20 Federation. AAF represents a network of over 70
21 community organizations in the Northeast who serve
22 many diverse Asian communities. We're also a proud
23 member of the Language Justice Collaborative, who
24 advocated for and supported the implementation of
25 Local Law 30.

2 The Asian population continues to be the
3 fastest-growing group in New York City. They also own
4 18 percent of employer firms in the city. These small
5 businesses are not only economic engines in the
6 lifeblood of immigrant communities, they're also at
7 the front lines of interacting with public-facing
8 City agencies, all of whom are covered under 2017's
9 Local Law 30. As 65 percent of Asian New Yorkers are
10 foreign-born and over 40 percent have limited English
11 proficiency, language access is crucial for them to
12 receive equitable services. Yet, in interviews with
13 our clients, four out of five business owners did not
14 know they have the right to language access when
15 working with agencies. Only two had ever used
16 Language Line. The one owner who knew about Language
17 Line access from friends told us that through her
18 five years of using the service, sometimes it was
19 helpful, but many other times they needed to wait
20 hours for an available interpreter, rendering the
21 service null. And only one out of five cases had an
22 inspector themselves call Language Line. Most often,
23 English-speaking inspectors do not alert the owner
24 that this is an option. Many of these business owners
25 may speak enough English to get through the

2 interaction but not enough to understand details or
3 how to follow up. For two dry cleaners, they did not
4 understand that violations were being issued, and
5 inspectors wrote their reports under a ticket section
6 titled Recommendations. This miscomprehension led to
7 accruing fines and bars on new permits, and one of
8 the dry cleaners did not discover these violations
9 until three years later, at which point they owed
10 over 6,000 dollars. In the most egregious cases, the
11 inspector is often being contracted by a City agency
12 to do inspections on behalf of the agency, which then
13 issues violations based on the report. AAF's small
14 business team works to mitigate these effects, taking
15 calls from business owners going through inspections
16 and providing assistance when dealing with City
17 agencies. However, better City services and support
18 are crucial to closing loopholes in language access.
19 To this end, we first support Council Member Hanif's
20 move to establish an Office of Translation and
21 Interpretation, as human translators and interpreters
22 will greatly improve outreach materials and are
23 crucial for equitable access to services. We also
24 secondly recommend that all inspectors, including
25 both city employees and third-party contractors, be

2 required to offer language access to inspectees.
3 Given that publicity about Local Law 30 has clearly
4 been minimal, immigrants are mostly unaware of these
5 rights and are not in a position to advocate for
6 language access themselves. Therefore, we urge the
7 Council to require inspectors to ask whether these
8 services are required, even in cases where it may
9 seem that the inspectee has basic English. Thank you
10 again for this opportunity to testify, and I'd be
11 happy to answer questions.

12 CHAIRPERSON AVILÉS: Thank you so much for
13 all of your testimony.

14 I guess I wanted to start here. I was
15 actually out recently with a City agency doing
16 outreach to small businesses, and it was the first
17 time I had heard someone say the Language Line was
18 really helpful, because I had never heard that before
19 from providers or City agencies and, in the context,
20 what became clear was that this person was actually
21 quite motivated around using his apparatus and trying
22 to figure out how to support the business owner so
23 they could communicate, and he also mentioned, you
24 know, people don't really like want to go that far.
25 They're not willing to, like, go through all the

2 weird machinations of having a speaker and having
3 while you're doing these inspections, which brings me
4 back to this notion of enforcement and higher
5 standards. I feel like we're stuck in a spiral of
6 we're just trying to comply with the bare minimum and
7 never seem to be advancing toward full standard so I
8 guess I realize I'm probably doing more commentary
9 than questions, but where would you prioritize? I
10 guess, what do you think about this question of
11 enforcement and how the City could do that, and where
12 would you prioritize in this huge apparatus of places
13 that we could really begin to, like, build our
14 language access and cultural competence? It's a big
15 question. I should have asked the Administration that
16 question.

17 RIVA SHANG: Yeah, I think for us, because
18 there's so little enforcement mechanism for Local Law
19 30, it's crucial, like, we're the ones on the ground
20 hearing these complaints from business owners, and
21 there's really no ability for them to report these
22 cases themselves to agencies so we're really the one
23 gathering these stories and being the conduit for
24 being able to bring it to, you know, City
25 government's attention. I don't know. I, you know, as

2 not a policy wonk myself, I'm not sure what we could
3 implement, but I would say giving the business owners
4 themselves some sort of recourse to be able to report
5 when language access is not being offered. I think,
6 in general, with inspections, there's just a power
7 dynamic at play where immigrant business owners have
8 very little ability to, you know, report when they're
9 being treated unfairly or the inspector is just
10 coming in, issuing violations, not really explaining.
11 This is something we really see on the ground all the
12 time. So, in general, I think with inspectors, there
13 needs to be a little bit more of a recourse for
14 business owners to report when inspectors are being
15 unfair and when they're not being patient with, you
16 know, offering Language Line or letting them know
17 that these services exist.

18 CHAIRPERSON AVILÉS: Thank you. I realize
19 that we didn't get into cultural competence nor this
20 notion of how much of our City apparatus is actually
21 multilingual and how we make sure to lean into that
22 strength as opposed to pulling people in at kind of
23 random ways.

24 I guess I was curious, Adama, you
25 mentioned cultural competency is really a critical

2 issue and how Afrikana is also training folks in
3 community. Could you lay out, and I know you have a
4 vision and you're doing this work, and I feel like we
5 have a lack of creativity and vision around how to
6 make it happen, could you lay out maybe some
7 recommendations around, like, concrete next steps the
8 City could take to begin to address this?

9 ADAMA BAH: Sure. I think one of them is
10 you have to fund organizations from those countries.
11 So, if you hire someone because they're Caucasian and
12 speak French, they may not understand what's
13 happening in Africa or what we are going through or
14 someone who learned French in the United States. They
15 do not understand the struggles or what we went
16 through so they may not understand when a woman
17 doesn't look at them in the eyes or when a man
18 doesn't shake her hand so what we do at our office is
19 we train asylum seekers who speak English and speak
20 16, 17 languages at a time, and what we have done,
21 we've included civic education so they can understand
22 the systems in America and also understand what's
23 happening and how to be an advocate for your client.
24 Because it's not just about translating. Because if
25 you hear the person being aggressive to your client,

2 you should remind the person they should be
3 respectful. Your client does not understand. So, it's
4 a process. It's hard to teach that if you don't have
5 compassion. So, I definitely think you have to fund
6 organizations that are coming from those ethnic
7 groups.

8 CHAIRPERSON AVILÉS: Thank you so much. I
9 guess I wanted to just quickly, there was some other,
10 y'all had some really good recommendations. Oh, my
11 goodness, I'm getting lost in my papers. Yeah, I
12 guess I thank you for certainly the recommendations
13 around the consistency between contractors. We see
14 that the City has no apparatus and has not been
15 thinking about the contractors. When we see in the
16 report 135 contractors at varying levels from 20,000
17 dollars to 18 million dollars and you're experiencing
18 on the ground those gaps, there's enormous amount of
19 work to be done around consistency, assessment of
20 contractors, and finding out what exactly are we
21 paying for and why can't we hire all the folks that
22 Adama is working with to be able to meet that need is
23 mystifying to me, but thank you for the
24 recommendations and certainly your testimony today,
25 so thank you.

2 The next panel, Jorge Paz Reyes, Ana
3 Juarez, and Ennery Valbrun. Excuse me if I
4 mispronounce your name.

5 JORGE PAZ-REYES: Dear community, dear
6 Members of the City Council of Community Immigration,
7 Assembly Member Alexa Avilés, thank you for the
8 opportunity to speak today regarding the crucial
9 issue of language access for our community members.
10 My name is Jorge Paz-Reyes and I'm currently the
11 community organizer at Mixteca Organization, a
12 community-based organization dedicated to the
13 Spanish-speaking community of Sunset Park as well as
14 individuals from indigenous backgrounds who speak
15 languages such as Taplaneco, Mixteco, Nahual,
16 K'iche', Mem, among others.

17 I recognize that Local Law 30 has played
18 a crucial role in ensuring that all New Yorkers,
19 regardless of their language proficiency, can access
20 vital public services. However, we must acknowledge
21 the significant gaps remaining in the enforcement and
22 implementation of this law. Our community members
23 often face language barriers that hinder their
24 ability to access essential services including
25 healthcare, education, and social benefits.

2 Here are some of the challenges that we
3 see at Mixteca. First of all, there is a limited
4 interpretation service. While many agencies have
5 Spanish interpreters, the need of indigenous-language
6 speakers are often overlooked. Individuals speaking
7 languages such as Nahual, Mixteco, or K'iche'
8 struggle to find appropriate language access and
9 assistance, leading to missed opportunities for
10 critical service. As in the report was mentioned,
11 there was only one CBO that was identified that
12 provides indigenous languages.

13 There's also the lack of cultural
14 competency. Many services providers lack the
15 understanding of unique cultural backgrounds of our
16 community members, and this not only affects
17 communication but also impacts the overall quality of
18 service. For this, our recommendations are that there
19 should be an increase of funding for language access
20 programs. We urge the City Council to allocate
21 additional resources for training interpreters and
22 provide multilingual materials specifically for
23 indigenous languages. We also advocate for
24 undocumented experts and community members that have
25 the expertise to provide that language access. Expand

2 the language services. We also recommend that the
3 City expands the languages that Local Law 30
4 currently covers in order to provide community
5 members from indigenous backgrounds to access the
6 resources that they deserve.

7 Thirdly, community initiatives and
8 collaborations with CBOs. We recommend to promote
9 outreach programs to educate individuals about the
10 rights and available services, ensuring information
11 is disseminated in all relevant language as well as
12 continuing the collaboration with community-based
13 organizations such as Mixteca to ensure that the
14 community is properly given the resources that they
15 need.

16 Finally, at Mixteca, we believe that our
17 community deserves to be heard, understood, and
18 supported in their native language. We believe that
19 with the stronger enforcement of Local Law 30,
20 increased funding, and improved outreach efforts, we
21 can create a more inclusive city where every resident
22 has equitable access to public services. Thank you
23 for your attention on this vital matter, and I have
24 brought two community members so they can also share
25 their experiences. Thank you.

2 ENNERY VALBRUN: (SPEAKING SPANISH)

3 CHAIRPERSON AVILÉS: (SPEAKING SPANISH)

4 Who's gonna, oh, okay, there she is.

5 INTERPRETER: I'm Ennery Valbrun. I'm
6 Haitian, and I speak three languages and very little
7 English.

8 CHAIRPERSON AVILÉS: (SPEAKING SPANISH)

9 ENNERY VALBRUN: (SPEAKING SPANISH)

10 INTERPRETER: I am an official translator
11 of the Mixteca organization, and I help members of
12 the community in Spanish, Creole, and French.

13 ENNERY VALBRUN: (SPEAKING SPANISH)

14 INTERPRETER: And hopefully, with time,
15 also English.

16 ENNERY VALBRUN: (SPEAKING SPANISH)

17 INTERPRETER: My experience in New York
18 has been easier thanks to the three languages that I
19 can interpret.

20 ENNERY VALBRUN: (SPEAKING SPANISH)

21 INTERPRETER: In my job as an interpreter...

22 ENNERY VALBRUN: (SPEAKING SPANISH)

23 INTERPRETER: I have been able to help a
24 lot of immigrants receive the help they need.

25 ENNERY VALBRUN: (SPEAKING SPANISH)

2 INTERPRETER: And with help of Local Law
3 30, I've been able to provide help in Spanish,
4 French, and Creole.

5 ENNERY VALBRUN: (SPEAKING SPANISH)

6 INTERPRETER: Thanks to the public
7 services of the City, I've seen how families have
8 been able to access health and education resources
9 and food assistance.

10 ENNERY VALBRUN: (SPEAKING SPANISH)

11 INTERPRETER: And thanks to the fact that
12 they've received services in their own language,
13 they've been able to adapt easier to the city.

14 ENNERY VALBRUN: (SPEAKING SPANISH)

15 INTERPRETER: These resources are vital so
16 that the immigrant community can adapt to the city
17 easier and contribute to our culture and also to our
18 economy.

19 ENNERY VALBRUN: (SPEAKING SPANISH)

20 INTERPRETER: That's why as an immigrant
21 and as an interpreter, I ask that you please continue
22 giving the (INAUDIBLE) needed to continue assisting
23 the community in their own language.

24 ENNERY VALBRUN: (SPEAKING SPANISH)

25

2 INTERPRETER: To receive assistance in
3 their own language not only empowers the community
4 but also helps us grow, all of us, as New Yorkers.

5 ENNERY VALBRUN: (SPEAKING SPANISH)

6 INTERPRETER: I have lived in several
7 places including Santiago, Chile, a city somehow
8 similar to New York...

9 ENNERY VALBRUN: (SPEAKING SPANISH)

10 INTERPRETER: That's why I believe it's so
11 important that we have a law such as Local Law 30.

12 ENNERY VALBRUN: (SPEAKING SPANISH)

13 INTERPRETER: So thank you so much for
14 your time and efforts, and I hope that you can
15 protect and expand the benefits provided in Local Law
16 30.

17 CHAIRPERSON AVILÉS: (SPEAKING SPANISH)

18 ENNERY VALBRUN: (SPEAKING SPANISH)

19 ANA JUAREZ (READ BY INTERPRETER): Good
20 afternoon, Members of the Council and the City and
21 the Immigration Committee. My name is Ana Juarez. I'm
22 an immigrant from Mexico in the Bay Ridge community.
23 There's a lot of things I saw such as my son being in
24 medical treatment. He has leukemia or blood cancer.
25 Many times, I had to use translating services, be it

2 physically or online. Thanks to Local Law 30, I had
3 the opportunity to get help with public agencies and
4 receive the needed attention to take care of my son.
5 I saw that it's very necessary to have translation
6 for people who do not understand the language to be
7 able to communicate with the doctors that help their
8 sick children, be it little ones or teenagers. Also
9 for family members who are taking care of an adult
10 who is sick. The translation service is very
11 important for people because their treatment depends
12 on the guidance of the doctor for the parents or for
13 themselves. Because this is a life-or-death
14 situation, the guidance they give, such as how to use
15 medication, what to do if the child with cancer shows
16 fever, how to go to the ER quickly without waiting,
17 that could cost their life. It's also necessary to
18 have translation services for people who come from
19 other countries looking for a better life in this
20 country who feel that that's their salvation in life
21 and those who come to work and give back to the
22 economy. Many are not looking for medical attention
23 because they're afraid of not finding anyone who
24 understands their language or simply they don't find
25 a translation service. Translation services are very

2 important for all of us who live in this city and for
3 schools. The city is formed by many people of many
4 different nationalities. It's also something that
5 supports a family to have translation, be it
6 physically or online or on telephone. That's why a
7 day like today, as an immigrant, as a mother, and as
8 a New Yorker, I ask that you please give more funding
9 to have more languages in the agencies of the City of
10 New York. Thank you very much.

11 CHAIRPERSON AVILÉS: Are you aware, have
12 you used, or have you seen others use 3-1-1 to issue
13 complaints around language inaccessibility? (SPEAKING
14 SPANISH)

15 INTERPRETER: (SPEAKING SPANISH)

16 JORGE PAZ REYES: Yeah, so usually at
17 Mixteca we do give them the guidance of the 3-1-1
18 being the place to place complaints. However, we do
19 not see it as a place to complain about language
20 inaccessibility. It is not promoted that way, and it
21 is not something that really comes naturally to
22 community members. It is seen to place complaints for
23 noise or something more physical, but when it comes
24 to language inaccessibility, it's not something that
25 we identify with.

2 CHAIRPERSON AVILÉS: Yeah, thank you so
3 much. I think a lot of New Yorkers don't use 3-1-1
4 for a lot of reasons, but we see that this is the
5 data that the City is using to verify whether it's
6 doing a decent job or not, or at least one of the
7 data points, so I would encourage all of us to start
8 utilizing this portal more to put forward data that,
9 we know the services are not there, but we need also
10 consistent data around it so thank you so much. Thank
11 you for the work that you're doing and your testimony
12 today. Gracias.

13 JORGE PAZ REYES: Thank you.

14 CHAIRPERSON AVILÉS: So now we will turn
15 to the virtual panelists.

16 For virtual panelists, once your name is
17 called, a Member of our Staff will unmute you and the
18 Sergeant-at-Arms will set a timer and give you the go
19 ahead to begin. Please wait for the Sergeant-at-Arms
20 to announce that you may begin before delivering your
21 testimony.

22 Now, I will call our first virtual
23 panelists, Abigail Dorcin and Miral Abbas.

24 SERGEANT-AT-ARMS: You may begin.

2 ABIGAIL DORCIN: My name is Abigail
3 Dorcin, and I am an Organizing Manager at La Colmena,
4 an immigrant and workers rights center located on
5 Staten Island. Our mission is to provide and empower
6 immigrant workers through education, culture,
7 organizing, and economic development. As part of the
8 Day Laborer Coalition Domestic Worker Initiative, we
9 are dedicated to supporting day laborers and domestic
10 workers on Staten Island. Our work allows us to be
11 there for the community when we are needed the most.
12 Recently, our work has allowed us to be on the
13 forefront to support our new neighbors. For example,
14 our center has seen thousands of new arrivals this
15 past year, meanwhile supporting long-term immigrants
16 who have been here for years. One essential aspect in
17 providing the best services to the community is the
18 significance of language access and translation. Many
19 of our new neighbors' experience language barriers,
20 which can severely limit their ability to access
21 important services, understanding their rights, and
22 navigate an unfamiliar environment. By offering
23 translation services and multilingual resources, we
24 ensure that everyone can fully engage in our
25 programs, which range from OSHA and scaffolding

2 training to Know Your Rights workshop. When people
3 can communicate in their native language, they are
4 more likely to seek help and successfully integrate
5 into the workforce. This is why at La Colmena, we are
6 proud to provide a safe space to diverse communities
7 by prioritizing language access. When our members
8 come to our centers or new arrivals step foot at La
9 Colmena for the first time, always let us know that
10 they are happy to have received the information that
11 they needed. There is still much ahead of us, but La
12 Colmena looks forward to working with the Council to
13 bring language accessibility at all levels. Thank
14 you, Chairwoman, and to the rest of the Council for
15 this opportunity to testify on behalf of our vibrant
16 Staten Island community. Thank you.

17 CHAIRPERSON AVILÉS: Thank you. Thank you
18 for your work. Miral Abbas.

19 SERGEANT-AT-ARMS: You may begin.

20 MIRAL ABBAS: Good afternoon. My name is
21 Miral Abbas, and I am the Health Partnerships
22 Coordinator at CACF, or the Coalition for Aiding
23 American Children and Families. Thank you very much
24 to Chair Avilés for holding this hearing and
25 providing the opportunity to testify.

2 Founded in 1986, CACF is a nation's only
3 pan-Asian children and families advocacy organization
4 and leads the fight for improved and equitable
5 policies, systems, funding, and services to support
6 those in need. The Asian American Pacific Islander,
7 or AAPI, population comprises nearly 18 percent of
8 New York City, and many of our diverse communities
9 face high levels of poverty, overcrowding,
10 uninsurance, and linguistic isolation, yet the needs
11 of our AAPI community are consistently overlooked,
12 misunderstood, and uncounted. We are constantly
13 fighting the harmful impacts of the model minority
14 myth that prevents our needs from being recognized
15 and understood. Our communities, as well as the
16 organizations that serve the community, too often
17 lack the resources to provide critical service to
18 those most marginalized AAPI New Yorkers. Working
19 with over 70 member and partner organizations across
20 the city to identify and speak out on the many
21 challenges our community faces, CACF is building a
22 community too powerful to ignore. While Local Law 30
23 has thought to provide additional support to our LEP
24 community, language barriers are still a huge
25 obstacle faced by many folks in immigrant

2 communities, and especially in our AAPI community. In
3 New York City, the AAPI community has the highest
4 rate of linguistic isolation of any group, as 46
5 percent have limited English proficiency, according
6 to a recent report from the New York City Department
7 of Health and Mental Hygiene. However, more than two
8 in three Asian seniors in New York City are LEP, and
9 approximately 49 percent of all immigrants at NYC are
10 LEP. During the height of the COVID-19 pandemic, we
11 conducted a rapid needs assessment in collaboration
12 with the NYU Center for the Study of Asian American
13 Health and Chinese American Planning Council, and we
14 surveyed over 1,000 adults of Asian, Hispanic,
15 Latinx, or Arab descent living in the metropolitan
16 New York area to assess the current and ongoing needs
17 of the community during the pandemic. The study
18 highlighted the disproportionate impact that the
19 pandemic had had on New York Asian American community
20 and demonstrated the importance of language access.
21 Specifically, the study found that 34 percent of
22 Asian American adults reported language barriers
23 being a challenge during the pandemic, and
24 furthermore, 27 percent of Asian American respondents
25 indicated that they felt that they did not have

2 regular access to timely, accurate information during
3 the pandemic in their own language. The study also
4 shed light on the specific language barriers Asian
5 American folks were facing. Chinese, Korean, and
6 Bangladeshi adults reported high rates of
7 difficulties waiting for an interpreter, while
8 Korean, Japanese, and other Asian adults reported
9 higher rates of difficulty getting written materials
10 in their preferred languages. Being unable to access
11 vital COVID-19 information or any health services can
12 be a threat to one's livelihood. A recent report from
13 the Mayor's Office of Immigrant Affairs found that
14 over half of the service centers were in some
15 violation of the local law..

16 SERGEANT-AT-ARMS: Thank you. Time has
17 expired.

18 MIRAL ABBAS: Thank you.

19 CHAIRPERSON AVILÉS: Thank you. You can
20 also submit your testimony for the record at
21 testimony@council.nyc.gov. Thank you so much.

22 Now, we've heard from everyone who signed
23 up to testify. If we've inadvertently missed anyone
24 who would like to testify in person, please visit the
25 Sergeant-at-Arms table and complete a witness slip.

2 If we've inadvertently missed anyone who would like
3 to testify virtually, please raise hand function now
4 in the Zoom, and a Member of our Staff will call on
5 you in the order of the hands raised.

6 I will now read the names of those who
7 have registered to testify in person or virtually.
8 Jamin Chah (phonetic), Arash Azizadeh (phonetic),
9 Taina Wagnett (phonetic), Marilla Lee (phonetic), and
10 Ashley Chen (phonetic). If you're on Zoom, please
11 raise your hand.

12 Seeing no one else, I would also like to
13 note again that written testimony will be reviewed in
14 full by the Committee Staff and may be submitted to
15 the record up to 72 hours after the close of this
16 hearing by emailing it to testimony@council.nyc.gov.

17 With that, I would like to especially
18 thank Mixteca, CACF, New York Immigration Coalition,
19 Afrikana, La Colmena, Asian American Federation,
20 Korean American Family Services, and so many other
21 organizations that are providing language
22 accessibility and culturally competent services to so
23 many New Yorkers. I thank them for their testimony. I
24 thank them for their support, and I thank the

2 Administration and all who participated in today's
3 hearing and, with that, we close. [GAVEL]

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

C E R T I F I C A T E

World Wide Dictation certifies that the foregoing transcript is a true and accurate record of the proceedings. We further certify that there is no relation to any of the parties to this action by blood or marriage, and that there is interest in the outcome of this matter.



Date October 7, 2024