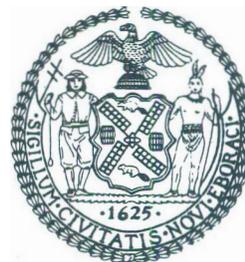


CITY OF NEW YORK

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Mayor

EDGARDO N. VAZQUEZ
Chairman



Report of the MAYOR'S COMMISSION ON HISPANIC CONCERNS

DECEMBER 10, 1986

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CHAPTER 10

CITY LANGUAGE SERVICES

Over one and a half million Hispanics live in New York City. "Hispanic New York" alone would be the fifth largest City in the United States and the tenth largest in the Spanish-speaking world. Of the more than 1.5 million Hispanics, 20-30 percent have limited English-speaking ability (LESA). These LESA Hispanics are often the poorest and least educated sector of our community, but the barrier created by limited English denies them access to many essential services.

In the Education chapter, the Commission outlines the need for more English classes as one important strategy for overcoming the language barrier. Yet, teaching English is not the definitive solution. There are never enough classes; the waiting lists for classes are long and the organizers of English classes estimate that, for every current student, there are three more actively seeking to join a class and many more who have been discouraged. Moreover, with the continued arrival of Hispanics and other non-English-speaking groups to New York, the LESA population is projected to increase over the next decades. Whatever action is taken on English classes, the issue of the delivery of some City services in Spanish must also be addressed.

A constant theme running through the Commission's public hearings and the numerous discussions with City officials and community leaders was the need for more bilingual, bicultural staff working in City agencies and more translated materials. The Commission found that the City's current use of language services (bilingual staff, interpreters, and translators) does not adequately meet the needs of the large LESA Hispanic population. After a review of the City's current language services, this chapter outlines the Commission's recommendations for the development of individual agency Language Service Plans based on proposed Guidelines for the Use of Bilingual Staff, Ad Hoc Interpreters, and Translators in City Agencies. The goal of these guidelines is to develop efficient, cost-effective programs

to ensure that LESA Hispanics have equal access to City agencies through services in their own language.

Although the recommendations primarily address the needs of the Hispanic community, the processes outlined can be easily adapted to provide services to other language groups. In addition to the Spanish speakers, there are some 250,000 other City LESA residents whose primary language is not English. The Commission expresses the hope that their needs will also be met through improving the City's language services.

Current Language Services

New York City agencies have for many years recognized the need to provide language services to ensure that LESA clients get equal service. The City agencies' submissions in response to the Commission's review of City services, and earlier research by the Office of Immigrant Affairs, Department of City Planning, have chronicled the initiatives taken by many agencies and their commitment to language services.

Despite this commitment, however, the research has also highlighted a number of problem areas in City language service delivery. These concerns fall into three main areas: staff, information, and coordination.

Staff:

* There are not enough bilingual/bicultural personnel in many City services. The Commission's survey found a lack of Spanish-speaking workers in many key areas, particularly in enforcement and uniformed services. Hispanics represent 30.9 percent of the Department of Probation's Family Court clients and 28.1 percent of the Adult Court clients. Thirty-three percent of inmates in New York City Correctional facilities are Hispanic. Neither of these agencies keep statistics on the English-language ability of the clients, but they report that a significant proportion of them have language difficulties and that Spanish is used often. Despite the need for bilingual staff, five of the Correctional facilities have no bilingual Correctional Counselors and only 8.7 percent of

Probation Officers are Hispanic (Spanish-speaking figures are not available). The Department of Juvenile Justice also reports a lack of Spanish-speaking staff in its admissions unit.

* Multilingual City employees are pressured to interpret for other workers in addition to their standard duties. Their normal workload is not reduced and they must work extra to compensate for their time away for interpreting. Hispanic Police Officers report that their chances of promotion are lowered because of time spent interpreting. The Health and Hospitals Corporation and the Department of Probation reported recent disputes with employees over interpreting duties. This disincentive to multilingual workers is a major barrier in providing language services and many employees with valuable language skills are reluctant to identify themselves as foreign-language speakers.

* Most City employees used to interpret or translate are not tested for their language ability and do not receive training in the skills necessary to perform these tasks. City employees are expected to interpret in a wide range of sensitive areas, yet only one agency reported testing the language ability of its staff and only two programs within two agencies provide any training. A recent study by the Office of Mental Hygiene of the Health and Hospitals Corporation found that the persons most often relied upon to interpret in Mental Hygiene services -- clerical staff, security staff, housekeeping staff, relatives, friends, and other patients -- rarely have the linguistic ability or training necessary to interpret accurately.¹

* Monolingual, English-speaking City employees often do not know how to work with LESA clients. People with limited English are told to "go away and come back with an interpreter" when attempting to obtain services from a City agency -- many do not come back. Although difficult to document, lack of sensitivity to LESA clients by City employees was an

¹NYC Health and Hospitals Corporation, Office of Mental Hygiene Services, Ad Hoc Interpreters Project, Report, (Draft only).

issue raised frequently during the Commission's public hearings and in interviews with ethnic service organizations.

Information:

* Most agencies do not maintain accurate statistics on the ethnic background and language ability of their clients. While a number of agencies break down client statistics by racial/ethnic group, only the Income Maintenance Program of the Human Resources Administration had statistics on the English-language ability of its clients.

* Most agencies do not have listings of bilingual staff, interpreters, or translated materials.

* Many of the City's crucial forms and information leaflets are not translated into Spanish. Agencies indicated that, given the resources, they would translate more information into Spanish.

* Much of the translated material currently available is incorrectly translated and presented (see below).

Coordination:

* There is no exchange of expertise and information on language services between agencies and the City lacks policies on the employment of bilingual staff, use of interpreters, standards for translations, reimbursements for language services, etc.

Given the nature of these three concerns, the Commission concludes that New York's LESA Hispanics are, in all likelihood, not receiving services they are eligible for, and that language difficulties are severely limiting the efficient delivery of the services they do receive.

This conclusion has been corroborated by other research already cited in Chapter 9. In 1978, a study by the Federal Office for Civil Rights found that insufficient bilingual services in City Income Maintenance

Centers resulted in discrimination against Hispanic clients.² Corrective action was subsequently taken by the Human Resources Administration, and the HRA is currently preparing language access plans for all its programs.

A 1984 survey of Food Stamp Centers found that it was difficult for clients to obtain information by telephone and that "prospective clients who speak only Spanish have an even rougher time getting information fully one half of the centers called [many in areas with a high proportion of Hispanics] did not have a Spanish-speaking staff member available at the time."³

In submissions to the Commission's review of City services, a number of agencies conceded that their lack of Spanish-language capabilities hindered their service delivery to LESA Hispanics. In addition, many speakers at the Commission's public hearings pointed to the lack of bilingual/bicultural staff in City agencies and the absence of translated forms and information as evidence of the lack of responsiveness to the needs of the Hispanic community. The City has also received a number of written complaints about the low standard of Spanish used in City publications.

Translations

As part of their submissions to the Commission, agencies were asked to submit copies of their translated material. The Commission found that many of the translations are inadequate. More than 90 percent of the

²U.S Department of Health Education and Welfare, Office of Civil Rights, Mendoza Report: Access of Non or Limited English Speaking Persons of Hispanic Origin to the New York City Department of Social Services, September 1978.

³Office of the Comptroller, News, February 16, 1984.

translations submitted to the Commission had one or more of the following errors:

Mistranslations: Some of the material submitted is simply badly translated. Many of the common mistakes of inexperienced translators are evident, e.g., incorrect or inappropriate words and phrases, incorrect Spanish grammar, use of Spanish words with English syntax, etc. The Department for the Aging added an insert to the Spanish version of the Silver Pages apologizing for the mistakes in translation. A number of other translations have been discarded after publication when serious errors were pointed out.

Typographical errors: Many translations obviously have not been typed or proofread by Spanish speakers. Substitution of letters and words running into each other appear throughout many publications.

Incorrect punctuation: The use of accents is essential in Spanish. Without them, pronunciation and meaning can change. A number of translations did not have accent marks and others used English punctuation instead of Spanish.

Language too formal or technical: Many LESA Hispanics have relatively poor reading skills, even in Spanish -- 61 percent of New York's Hispanics have completed less than 12 years of schooling -- yet some translations read like doctoral theses. For example, the Department for the Aging provides a complex Spanish translation of a publication describing the elderly's rights to benefits. Many of their audience, the Spanish speaking elderly, have not completed junior high. Translations should provide information in easy-to-read, straightforward Spanish.

Content and language not marked in English: This makes it impossible for monolingual, English-speaking staff to sort, file, and most importantly, distribute translated material. It is essential that all translations carry the title of the publication in English and the notation "Spanish translation" on the cover. Agencies should attempt to produce bilingual material, i.e., written in both English and Spanish.

Organization and program names not provided in English:

Translations usually have the names of City agencies, programs, benefits, etc., translated into Spanish. However, if the original English version is not included, the reader may be unable to find the service: a potential tenant may read about the services offered by "La Autoridad de Viviendas," but is unlikely to find that name in the phone book or on building signs. Moreover, the Housing Authority even uses two different translations of its name -- "La Autoridad de Viviendas," and "La Autoridad de Hogares" (at times misspelled as "Viniendas" and "Hagares") -- in its official publications. At least two other agencies use more than one translation of their names: the Department of Consumer Affairs uses "Departamento de Asuntos del Consumidor" and "Departamento de Protección al Consumidor; and the Department of Housing Preservation and Development uses "Departamento de Preservación y Renovación de Vivienda" and "Departamento de Desarrollo y Preservación de Vivienda."

Inconsistent translations: Just as some agencies use different Spanish translations for the agency name, more than one translation of other words or phrases are often used. The Human Resources Administration refers to homeless families as "familias sin hogar" in some publications, while in others they are "familias desamparadas." Both translations are correct, but their inconsistent use can lead to confusion over programs and eligibility.

No indication given of how to approach the agency in Spanish: All translations attempt to provide LESA Hispanics with information about services, yet few translations tell them how they can get those services if they do not speak English. Translations tell people "para mayor información llame . . . , o póngase en contacto con . . . (for more information call . . . , or contact . . .) but often no one at the listed location or number speaks Spanish. All translations should state the Spanish-language capabilities of the agency.

Material not dated: Translations tend to be updated less often than the corresponding English materials. Readers need to know how old the information is.

Currently, the City has no formal, central facilities for translating into Spanish. While some translations are made by translators working in the larger City agencies or are contracted out to professional translating services, most are done as "favours" by staff who were not employed to translate but who happen to speak Spanish. (The Commission itself was asked on a number of occasions to translate documents for City agencies.) Most of the people doing the favor do not have the training necessary to translate. The Commission employed an outside translator to translate parts of this document.

Address Inadequacy of Language Services Through Individual Agency Language Service Plans Based on City-Wide Guidelines

The Commission has elected to present to the Mayor an integrated proposal for the adoption of City-wide Guidelines for the Use of Spanish Bilingual Workers, Ad Hoc Interpreters, and Translators in New York City Agencies. Attachment 1 details the Commission's proposal for the Guidelines. The Commission recommends that these Guidelines be used to direct City agencies in developing individual agency plans for providing language services. These individual agency Language Services Plans would convert the general concepts of the Guidelines into specific policies and administrative procedures for the agency. The Commission recommends that these Language Services Plans be submitted to the Mayor no later than July 30, 1987 (see Attachment 2).

The Guidelines cover all Mayoral agencies or services of those agencies deemed as providing substantial public contact services. In addition, the Mayor should move to have the Guidelines adopted by non-Mayoral agencies, such as the Health and Hospitals Corporation, which provide critical services to the Hispanic community. Some of these agencies do not provide direct services to clients, but administer funding to contract, non-government agencies which furnish services on behalf of the City. These City agencies should ensure that, as a condition of funding, contract agencies provide language services.

The intent is to provide language services wherever possible through existing City positions. The Guidelines do not require the employment of interpreters, i.e., staff employed only to interpret. Language services will be provided primarily through bilingual workers in established job titles or in other instances by other employees with language skills interpreting on an ad hoc basis. All employees providing language services will be tested for their language skills and trained in interpreting and translating techniques.

This proposal calls for two major changes to the current personnel practices of the City:

First, greater use of priority in hiring to attract Spanish bilingual employees and to ensure that personnel in key service positions reflect the language service needs of the client population. These direct bilingual service employees will be the primary deliverers of language services. They will receive priority in hiring but no extra payment for use of their language skills within their job title.

Second, the creation of a New York City Language Bonus to reimburse other staff who agree to provide language services "out of title" (i.e., extra duties not included in the original job description for the title). Staff receiving the bonus will be used to augment the language services of direct bilingual service workers by providing ad hoc interpreter and translator services only where there are no direct bilingual service workers or full-time translators.

The Guidelines are to be implemented on an agency-by-agency level. However, before agencies can be asked to develop Language Services Plans, the City must lay the groundwork by introducing appropriate legislation, establishing coordination procedures, extending the use of selective certification, negotiating the payment of the Language Bonus, and organizing testing and training of personnel providing language services.

Enabling Legislation

A legislative base for language services is essential. The Commission recommends enactment of legislation at a City-wide level, or the amendment of individual agency charters. The following draft language, similar to Local Law 535 recently passed by the City Council mandating the use of interpreters in emergency rooms in City hospitals, would be used:

"[agencies] shall provide bilingual staff, interpreter and translator services for limited-English speaking users of the agency, where such limited-English speaking users of any single language group comprise at least five percent⁴ of the people to be serviced by the agency or offices of the agency."

The use of a five percent threshold establishes a minimum above which agencies are legally obligated to provide language services. Below five percent, given the small concentration of LESA clients involved, agencies cannot be reasonably expected to provide continuous language services. However, the mechanisms instituted through these Guidelines will also assist agencies in servicing language populations smaller than five percent.

Coordination and Monitoring

The implementation of these Guidelines requires coordination between agencies and ongoing monitoring of agency compliance. The Commission recommends that the Mayor appoint a Language Services Coordinator in the Office of Operations at a level high enough to ensure that the Guidelines are enforced and to oversee their functioning.

⁴Five percent was the figure in the original version of Intro 535 and is the standard used in similar legislation in other jurisdictions. The final version passed by the Council uses 10 percent as the threshold. The Commission understands that calculations by the Department of City Planning using 10 percent have too narrowly restricted the scope of the law.

In addition to monitoring language service plans, the Language Services Coordinator would provide technical assistance to agencies on translating and interpreting issues, develop training materials in translating and interpreting skills, establish a central library of City and other relevant translations, and keep listings of translators available for City work. The Coordinator would also develop the mechanism for the review of City translations (see Attachment 3 for job description).

Selective Certification and Parenthetical Titles

Selective certification for language skills is currently used on an occasional basis for a number of City titles. The Commission recommends that selective certification for Spanish-language skills or the creation of parenthetical titles (see Guidelines) be used as a matter of course for all public contact titles.

New York City Language Bonus

The Guidelines essentially recognize that knowledge of a second language is a specialized, marketable skill. Employees hired to provide direct bilingual services (i.e., those who use their language skills only to perform tasks within a current job description) will receive priority in hiring. Other employees agreeing to provide ad hoc interpreting or translating out-of-title will be reimbursed through the New York City Language Bonus. The Language Bonus will pay eligible participants up to \$1500 per annum for the out of title work. In exchange for the Bonus, employees will be expected to make themselves available to other workers to translate or interpret where necessary.

The only workers eligible to receive the Language Bonus are workers in "public accessible" positions, i.e., positions that are reasonably accessible to areas where the public physically enters City agency offices, and positions in which employees can be reasonably expected to take "time out" to perform language service duties. Agency Language Services Plans would identify the public-accessible positions in the agency. All candidates for the Bonus will sit for approved language exams as

interpreter and/or translator. Successful candidates will receive \$1,250 per annum if they qualify as an ad hoc interpreter, or \$1,500 per annum if they qualify as ad hoc interpreter-translator.

Extra payment for language skills has been a point of controversy in City government for a number of years. Although the practice is widespread in other states (e.g., Texas, California), and such payments have been part of collective bargaining demands by New York City unions (see, for example, "General Demands of District Council 37, AFSCME, AFL-CIO for The Clerical Administrative Bargaining Unit," August 1985), the City has refused to agree to such payments. As far as the Commission has been able to establish there are two major reasons for refusal of the payment.

First, it "costs the City money." No estimates of the cost, however, have been made. Such costs can only be calculated accurately when agencies have submitted their Language Services Plans. As only ad hoc interpreters are to be paid, any costs will be reduced by covering the majority of language service needs with bilingual job titles. But whatever the cost, the Commission considers that it is far outweighed by the increased access to services for LESA New Yorkers who are deprived of services that their tax dollars pay for.

Second, City officials have expressed fear, not only of the costs involved with a Language Bonus, but of the precedent it would set. They talk of "opening a Pandora's Box." The Commission was told, "If we pay one group of people for a skill they happen to bring to City employment, we will be hit by requests for payments for all sort of things." The Commission, however, was never given a concrete example of a similar payment the City might be obligated to make. There is no other situation where City employees are so consistently asked to perform such a definable skill in addition to their normal work duties.

The Commission recommends that the City's objections to extra payment for language skills be dropped. In addition to the Language Bonus Payment, City agencies must ensure that time spent on ad hoc

interpreting or translating does not adversely affect the employee's work evaluation or chances of promotion. Interpreting or translating duties should be included in the criteria for any review of job performance and should be evaluated as a part of the employee's assigned duties.

Testing and Training

All persons who will be providing language services for the City will be tested for their language knowledge and will be required to participate in training workshops in interpreting and translating skills. A Spanish-language exam developed by the Bureau of Examinations of the Department of Personnel will be used as the basis for all examinations and selective certification in City agencies. Each agency may add extra items to the tests that are relevant to the agency's work.

The training can be undertaken either by the agency, the Language Service Coordinator, the Department of Personnel, or an outside consultant. The Division of Special Education of the Board of Education and the Office of Mental Hygiene of the Health and Hospitals Corporation have developed training curricula for staff volunteering to interpret or translate. These and other relevant curricula can be used to develop a City-wide training package. Candidates for language examinations should also be provided with self-study material to help improve their language skills. Development of language skills is to be at all levels within City government

RECOMMENDATIONS

- * That the Mayor direct all City agencies providing substantial public contact services to submit to him by January 1988 a Language Services Plan outlining the mechanisms by which that agency will ensure that LESA Hispanics have equal access to its services.
- * That a Language Services Coordinator be appointed in the Mayor's Office of Operations to coordinate and monitor the agencies' Language Services Plans and other City language service efforts
- * That the basis for the Language Services Plans be the attached proposed Guidelines for the Use of Spanish

Bilingual Staff, Ad Hoc Interpreters, and Translators in New York City Agencies. The Guidelines set out the minimum procedures for agencies' language services.

- * That legislation be introduced mandating the use of language services in City agencies.
- * That Spanish-speaking candidates be given priority in hiring for all public contact job titles in City agencies.
- * That other City employees not in public contact titles but who are willing and able to interpret or translate for clients and other workers, be paid a Language Bonus of up to \$1500 per annum in exchange for "out-of-title" ad hoc interpreting and translating.
- * That all persons providing language services for the City be tested for their language skills and trained in interpreting and translating techniques.
- * That all Spanish-language translations used by City agencies be reviewed to ensure that they comply with the minimum standards set out in the Guidelines.

[PROPOSED] GUIDELINES FOR THE USE OF BILINGUAL STAFF, AD HOC INTERPRETERS, AND TRANSLATORS IN NEW YORK CITY AGENCIES

Responsibility for Agency Language Services Plan

Each agency covered by the Guidelines is to nominate an officer to develop the agency's individual Language Services Plan. Where an agency is sufficiently large, a full-time liaison/coordination position is to be created to work with the City Language Services Coordinator and to administer the ongoing functioning of the plan.

Statistics on LESA Users

Agencies must keep abreast of the changing LESA population. Agencies are required to submit to the Language Services Coordinator regular surveys or estimates of the LESA client population of the agency and its facilities.

Initially, five percent can be calculated using available Census data on English-language ability from the Department of City Planning. Later, agencies are expected to develop their own database on the language ability of their clients. Under the Language Services Program, and to fulfill the requirements of the enabling legislation, all agencies are required to keep statistics on the ethnic and language background of clients, or other mechanisms must be developed to calculate the LESA representation among agency clients.

Translations (written material)

Each agency is to identify the material to be translated and determine the ongoing need for translators. Some agencies may require full-time translators, but where a full-time translator cannot be justified, short translations can be made by qualified agency employees; or, the agency is to contract translations out.

All translations must meet the following criteria:

- * Translations are to be done only by qualified personnel. Translators should have native-speaker knowledge of Spanish and experience in translating.
- * Translations are to be typed and proofread by bilingual staff.
- * Translations are to be reviewed by an independent translator before publication.
- * Spanish punctuation and accents are to be used at all times.
- * The original English title and the words "Spanish translation" are to be prominently displayed on the first page of all translations.
- * City agency, other organizations, and program names are to remain in English, followed by a Spanish version in parentheses, e.g., "para información sobre el HEAP - Housing Energy Assistance Program - (Programa de Asistencia de Energía del Hogar) llame al Department for The Aging (Departamento Para Personas Mayores)."
- * Translations are to state if and when Spanish speaking staff are available for further contact.
- * Translations are to be dated.

Each agency, in conjunction with the Language Services Coordinator, is to produce a glossary of Spanish translations of words and phrases specific to the agency to ensure consistency in all translated materials.

Bilingual Services

To ensure that there are enough Spanish bilingual workers in casework and public contact positions, Spanish-language skills must be a

basis for priority in hiring. Agencies should effect this priority in hiring in one of two ways:

* Selective Certification. The agency adds provisions for testing in language skills to the entry requirements of an existing title. All candidates who pass the language test and other requirements are given priority on the subsequent civil service eligibility list for that title. If the agency requires bilingual workers and no person on the eligibility list for the title has the appropriate selective certification, then the job is to be advertised externally as a bilingual position in the designated language, despite the existence of a current eligibility list (e.g., Alcohol Rehabilitation Counselor -- knowledge of Spanish required).

* Parenthetic Titles. The agency splits an existing title into two titles the existing title and its parenthetic equivalent, e.g., Caseworker and Caseworker (Bilingual). The parenthetic title is then treated as a separate administrative entity with separate recruitment efforts, separate civil service lists established, and separate calculation of staffing needs and allocation.

In their individual plans, each agency is to nominate titles for selective certification or creation of parenthetic titles, identify the number of bilingual workers needed, and specify their distribution among service locations. The need for Spanish bilingual staff is to be calculated using fixed staff/client ratios to be determined in the agency plan. Where an agency feels it is also important to ensure that bilingual staff are available in titles with substantial public contact, but not involving an ongoing relationship (e.g., intake officer), the agency also is to use selective certification to employ staff in these titles.

Direct bilingual service workers are employed to use their language skills only to perform their own duties within their title. If a bilingual service worker is asked to translate or interpret for other staff, he or she is to be considered as performing ad hoc interpreter duties and eligible for the Language Bonus.

Ad Hoc Interpreting

The major burden of language services is to be carried by direct bilingual service workers employed specifically for their language skills. In areas where it is not possible to employ direct bilingual service workers or where the proportion of LESA Hispanics does not justify a full-time bilingual worker, language services through ad hoc interpreting must be provided by other City workers who are able to perform those duties. These workers will be reimbursed for this out-of-title work through a Language Bonus.

Interpreting will be done in person or over the phone in "three-way" conversations. Interpreting "assignments" will be kept to a minimum, with as little disruption to the worker's duties as possible. Workers can elect to perform telephone duties only. When there is to be an ongoing contact, the client is to be referred to bilingual workers or to appropriate non-government organizations.

Employees who qualify for the Language Bonus will only be expected to perform ad hoc interpreting duties to a level at which they do not significantly disrupt their normal work load. The supervisors of employees agreeing to do ad hoc interpreting are to be informed of their participation and their work responsibilities are to be adjusted accordingly. A complaint mechanism is to be instituted to protect workers who feel that they are being asked to interpret too often.

Non-City employee volunteers who work in public access positions in City services are to be encouraged to participate in language services as ad hoc interpreters and translators. Agencies are to provide training and support for them. Only volunteers who have passed approved tests can provide language services.

Non-government organizations working with ethnic/language groups are to be treated as partners in ensuring that LESA clients have access to City services. In specific instances, it may be possible to ask workers in

non-government organizations to act as ad hoc telephone interpreters for small service locations or for less commonly spoken languages.

Language Banks

Agencies are to institute language banks -- listings of all direct bilingual service workers, other personnel receiving the Language Bonus, and appropriate non-government organizations servicing Hispanics.

Language banks are to be organized agency-wide or, where an agency has a number of large administrative divisions (e.g., bureaus, sub-agencies, etc.) or large service centers (e.g., hospitals), separate language banks can be compiled. Depending on the agencies' needs, the banks are to be operated in one of two manners:

- * The bank publishes the listing of language services and distributes them to agency workers. When a worker needs language services, he or she contacts a bilingual service worker or an ad hoc interpreter directly from the list.
- * The bank is administered by a central office which receives all calls regarding access to the bank. The office contacts the relevant bilingual worker or ad hoc interpreter and asks him or her to respond to the original inquiry.

Hotlines/Telephone Information

Any telephone number that an agency uses and advertises as a contact number for emergencies is to have Spanish-speaking staff available on all shifts. In addition, agencies are to ensure that LESA clients have access to telephone information by either:

- * ensuring that all information numbers have access to bilingual staff.
- * establishing separate Spanish-language information numbers.

* contracting with a private telephone interpreting service to handle non-English calls through three way conversations. These telephone interpreting services usually charge a yearly subscription fee and a fee per call. The Police Department's "911" service, which handles six million calls per year, estimates that it would cost \$18,000 per year to give 24 hour coverage of 86 languages (not including Spanish which is covered by Spanish, operators on all shifts).

In all advertising and outreach, agencies are to specify the telephone number Spanish speakers should use.

Other Personnel

These Guidelines cannot be implemented without the knowledge and cooperation of all City personnel. Personnel are to be informed of the existence of the Guidelines and properly instructed in their use.

In important and high-volume service areas, "intake protocols" -- a set of administrative rules which mandate the staff procedures for dealing with LESA clients -- are to be instituted. The procedures include use of the language bank, the "flagging" of client files to indicate that an interpreter is needed, referrals to non-government organizations, etc. Each agency is to develop appropriate protocols as part of their agency plan.

Outreach

Many LESA residents lack sufficient knowledge about City services; nor do they know that some services are provided in Spanish. Therefore, outreach is an important component of providing language services. Advertising the existence of language services in the City and distributing written translated material is the responsibility of the Language Services Coordinator, agency liaison/coordinators, and agency public affairs offices.

Attachment 2

IMPLEMENTATION OF RECOMMENDATIONS

The Commission envisages that this proposal will be implemented in the following manner:

Phase 1 - Initiation (October 1986 - March 1987)

i) Appointment of Language Services Coordinator and administrative staff.

Responsibility: Office of The Mayor

Time frame: by December 31, 1986

Cost: \$50,000 per annum, plus increments

ii) Issue directive for Language Services Plans to City agencies

Responsibility: Mayor, Language Services Coordinator

Time frame: by March 31, 1987

Cost: no direct cost

Phase 2 - Development (March 1987 - June 1988)

i) Introduction of legislation for language services.

Responsibility: Language Services Coordinator, City Council, Office of Intergovernmental Relations

Time frame: March 1987 - June 1988

Cost: no direct cost

ii) Negotiation of labor agreements for Language Bonus

Responsibility: Office of Municipal Labor Relations

Time frame: March 1987 - June 1988

Cost: no direct cost

iii) Development of language exams, training materials, etc.
Responsibility: Language Services Coordinator, Department of Personnel, outside consultants
Time frame: March 1987 - January 1988
Cost: \$150,000 for initial course development and pilot course

iv) Agencies to submit Language Services Plans
Responsibility: Agency Commissioners
Time frame: by January 31, 1988
Cost: no direct cost

Phase 3 - Operation (July 1988)

i) Language access plans take effect
Responsibility: Agency Commissioners
Time frame: July 1, 1988
Cost: no direct cost

ii) Priority in hiring Spanish bilinguals for all public contact positions.
Responsibility: Department of Personnel
Time frame: as hirings occur from April 1988
Cost: cost associated with selective certification: Department of Personnel

iii) Spanish language testing of present City employees
Responsibility: Department of Personnel
Time frame: first testing April 1988, then ongoing
Cost: cost associated with increased testing: Department of Personnel

iv) Payment of Language Bonus
Responsibility: All agencies
Time frame: from July 1, 1988
Cost: (The exact cost to the City of the Bonus can only be calculated when all agencies have submitted their Language Services

Plans. The Commission estimates that some 2,000 workers -- 2/3 of the City's Hispanic office and clerical workers, the category most likely to be affected -- will be eligible for the \$1,500 per annum. As only employees performing ad hoc interpreting or translating out-of-title receive the Bonus, the cost can be reduced by insuring that, wherever possible, direct bilingual service workers are appointed.)

v) Training in interpreting and translating skills

Responsibility: All agencies, Language Services Coordinator,
Department of Personnel

Time frame: from January 1988

Cost: depending on training structure

vi) Publicity, Outreach

Responsibility: All agencies, Language Services Coordinator

Time frame: ongoing

Cost: no direct cost

Attachment 3

[PROPOSED] JOB DESCRIPTION FOR LANGUAGE SERVICES COORDINATOR

- * Coordinate the development of agencies' Language Service Plans.
- * Provide technical assistance to agencies on all aspects of language services.
- * Identify testing materials to be used in evaluating the language competence of City employees.
- * Produce training materials on language services skills for City employees, and assist agencies in the use of the materials.
- * Identify the resources available for translating City publications.
- * Develop a mechanism to periodically review the quality of City translations
- * Develop a resource bank of foreign language materials published by City agencies and other relevant organizations.
- * Foster research on language barriers and language services in New York City.
- * Keep abreast of legal compliance issues.
- * Study the City's long-term needs for language services.
- * Promote inter-agency coordination of information, expertise, and resources on language services.