

Testimony of Mindy Tarlow, Director of the Mayor's Office of Operations, before the New York City Council Committee on Governmental Operations

Hearing on Language Access

Intro 1181

November 17, 2016

Good morning Chairman Kallos and Members of the Committee, colleagues in government, and members of the public. My name is Mindy Tarlow, and I am the Director of the Mayor's Office of Operations ("Operations"). Thank you Speaker Mark-Viverito for Introduction 1181 and for your commitment to improving access to City services for limited-English proficient individuals.

In this time of uncertainty and fear in immigrant communities, it's more important than ever to ensure that the City is accessible and welcoming in the languages spoken by our residents. It is a pleasure to testify here today.

The Mayor's Office of Operations is responsible for citywide performance management and project implementation, working cooperatively with individual agencies as well as coordinating multi-agency efforts. In addition to our general mandate, our office has long been involved in the provision of language access programs and cares deeply about these services as a mechanism for successfully integrating immigrant New Yorkers into the City's civic, economic and cultural life.

In 2008, Executive Order 120 tasked Operations, in collaboration with the Mayor's Office of Immigrant Affairs ("MOIA"), with providing technical assistance to *any* city agency providing direct public services in drafting and implementing a language access plan. We therefore worked collaboratively with MOIA to develop the content and format of the Language Access Plan, as well as the corresponding Language Access Self-Assessment surveys.

As our partnership with MOIA has evolved in recent years, they have taken on a more significant oversight role of the City's language access programs, and these initiatives are currently housed within their office. Our partnership with MOIA remains strong on many aspects of language access, such as in 2015, when we co-presented plain language training to agency Language Access Liaisons and Coordinators as a part of the training series hosted by MOIA.

Other past language access work by Operations includes the creation of a Language Access Resource Page on the City's employee portal that aggregates links to training, signage and other relevant resources. We also developed a Volunteer Language Bank that provides free translation services from volunteer City employees, as well as the NYCertified program to test the volunteers' language proficiency and provide official language proficiency certification. Operations also shaped the Language Gateway, which gives access to NYC.gov in languages other than English, and 311 developed a language access complaint form. We continue to track submissions of 311 complaints related to language access, and we are on call as a potential member of NYCEM's emergency response team as a part of their Language Access Protocol.

Today, Operations runs the Language Access Secret Shopper Program ("LASS") in consultation with MOIA. As a part of the program, interns - called "secret shoppers" - visit 150-200 walk-in service centers throughout the five boroughs pretending that they do not speak English. Secret shoppers ask for information about the services offered, observe and rate interactions with frontline staff and security, determine the amount and quality of translated signage and documents, and assess the quality of

interpretations, all while staying in character. Operations and MOIA then meet with agency managers to report on their findings, and where necessary, agencies take corrective actions. LASS findings not only help the City identify areas for improvement, but also highlight and recognize exceptional customer service by city employees.

I will now turn it over to my colleague, Commissioner Nisha Agarwal, to speak to MOIA's present role in the City's language access work.



Office of
Immigrant Affairs
Nisha Agarwal
Commissioner

November 17, 2016

Testimony of Commissioner Nisha Agarwal

NYC Mayor's Office of Immigrant Affairs

Before a hearing of the New York City Council Committee on Government Operations:

“Oversight—Assessment of NYC’s Language Access Services”



Thank you to Speaker Mark-Viverito, Chairman Kallos, and distinguished Committee members for this opportunity to speak with you about language access.

As a public interest lawyer, before my appointment as Commissioner of the Mayor's Office of Immigrant Affairs, I advocated for better language access for immigrant New Yorkers. I'm proud to continue that work at the Mayor's Office.

MOIA's mandate is to promote the well-being of immigrant communities. Sixty percent of New Yorkers are immigrants or children of immigrants. We want all New Yorkers to be fully engaged in the conversation that is New York City. Toward that end, one of MOIA's goals is to promote immigrant inclusion within City government, to ensure that the City's operations - our policies, programs, hiring practices, and communications and outreach strategies - account for and are responsive to the needs of immigrants. Language access is one key aspect of immigrant inclusion. We know that immigrants are anxious and fearful about some of the proposals we've heard at the federal level. As the Mayor has said, it is incumbent on the city to do everything we can to protect our immigrant residents, and one of the most immediate and tangible is to make sure everyone gets information about how to access necessary city services.

In this testimony, I will address the City's efforts to serve Limited English Proficient (or LEP) New Yorkers. Clear and timely communications is central to effective government. We support the goals of Introduction 1181 to address language barriers and look forward to discussing legislation that serves the needs of New Yorkers and the City.

A multilingual city requires a multilingual government

Like its communities, the City's language landscape is diverse and dynamic. New Yorkers speak more than 200 languages. The backgrounds, education, and literacy of immigrant New Yorkers vary widely.

About 46% of New Yorkers speak a language other than English at home, some of whom speak multiple languages.

Nearly a quarter of New Yorkers are considered LEP, which means they do not speak English as their primary language and have a limited ability to read, speak, write, or understand English. LEP New Yorkers must navigate the City system for a variety of reasons, such as to register for services, manage small businesses, or perhaps secure social assistance or emergency services. Language assistance makes this possible.

Similarly, frontline staff at City agencies serve multilingual LEP New Yorkers on a daily basis. In order to fulfill their respective missions, agency staff need the tools and support to engage proactively with diverse populations.

A short history of language access in NYC

Under the leadership of the City Council and the de Blasio Administration, New York City has been a national leader in ensuring that limited English proficiency is not a barrier for residents. MOIA has been involved with improving language access since its establishment in the City Charter in 2003, working with our sister agencies to implement a series of language access laws:

- Local Law 73 of 2003, which strengthened language access services for LEP New Yorkers seeking social services;
- Local Law 55 of 2009, which addressed language barriers at pharmacies;
- Local Law 132 of 2013 and Local Law 65 of 2015, which improved language access for LEP business owners; and
- Local Law 25, passed in 2016, requires that City agency websites have a “translate” button,” and
- Executive Order 120, signed by Mayor Bloomberg in 2008, which created a city-wide language access policy to ensure meaningful access for LEP New Yorkers to City services.

MOIA reinvigorated language access in 2015

MOIA plays an important role in improving the accessibility of city services for limited English speakers. MOIA:

- provides language access technical assistance to city agencies;
- shares best practices and coordinates agencies to accelerate this progress across the City;
- expands the body of multilingual materials that is clear and audience-appropriate; and
- helps LEP New Yorkers find services and information, both in-person and online.

At the beginning of the de Blasio administration, MOIA found that many agencies had made great strides in serving the LEP public, but there was more work to be done to support and broaden language access across City agencies.

Last year, with the support of the Mayor, MOIA launched its Language Access Initiative to strengthen language access on a citywide level.

As part of the Initiative, the Administration asked that all City agencies:

- appoint senior-level Language Access Coordinators, who had the authority within their agency to work with agency partners to advance language access goals
- create language access cabinets within their agency to support implementation,
- ensure that the appropriate language service contracts are in place, and
- update their language access plans.

MOIA hosted a series of trainings for agency staff about language access policies and resources. These sessions addressed an array of topics including bilingual staff, data collection, plain language, and emergency preparedness. They were also an opportunity for agencies to share best practices on language access.

MOIA continues to oversee annual language access assessments, provide one-on-one technical assistance to the agencies, and explore ways to integrate LEP communications into the standard operating procedures of City agencies.

To increase agency accountability, MOIA established and provided signage for a 311 language access complaint process that allows New Yorkers to file complaints around language access by calling 311. MOIA also meets periodically with advocates to hear language access concerns and supports the Language Access Secret Shopper program run by the Mayor's Office of Operations.

In addition, MOIA works to build tools to enhance the City's communication with LEP New Yorkers. We manage a volunteer bank that includes over 1300 bilingual City employees and created a pilot program for community interpreters. We assist with providing interpretation services at Mayoral events. MOIA also certified and trained 125 community volunteers to serve as interpreters with support of NYC Service.

MOIA is currently working with professors and students from the Strategic Management program at Parsons to understand better the frontline interaction between LEP customers and City staff in order to develop solutions.

And earlier this year, MOIA launched an ethnic and community media directory to expand City use of community and ethnic media, often a key resource for LEP and immigrant communities.

Agencies continue to expand language access

As MOIA continues to work with City agencies to build capacity and integrate multilingual communications into day-to-day operations, we have observed solid progress citywide.

One indicator is agency spending on contracted language services. Across City agencies, expenditures on language services have grown significantly since the beginning of the de Blasio Administration, increasing from \$13.8 million in FY2014 to \$18.5 million in FY2015 to approximately \$21.2 million during this past fiscal year. This includes the DCAS Citywide contracts, NYPD, Health and Hospitals, and the Department of Education.

Similarly, expenditures on ethnic and multilingual media have risen as well, from just over \$1 million in FY14 to \$2.4 million in FY16. The percentage of ethnic and community media as a

percentage of overall ad buys increased during that time from 15% to 22.5%. Multilingual ad campaigns, like those for Paid Sick Leave and IDNYC, are becoming more frequent. New Yorkers can increasingly find City information in publications like El Diario, Bangla Patrika, and Sing Tao Daily.

In the meantime, individual agencies have also taken significant steps to advance language access. For example:

- The Department of Education expanded its commitment to language access by adding borough-level Field Language Access Coordinators to oversee improvement across the system. They are currently training the roughly 1,700 school-based language access coordinators on policy and tools. Additionally, expanded direct access to telephonic interpretation for the school-based LACs will enable LEP parents to participate more fully in their children's education.
- Emergency Management provides its Ready New York materials in 13 languages to expand preparedness across all neighborhoods. In a citywide emergency, there is a Language Access Lead Team and Task Force to focus on the communication needs of LEP New Yorkers.
- The City Commission on Human Rights has embraced language access and significantly expanded its capacity to work with and protect the rights of LEP New Yorkers. It has added staff to its Law Enforcement Bureau who speak seven languages and has translated recent agency materials into nine languages.
- Small Business First, or SB1, an initiative led by Small Business Services and the Mayor's Office of Operations, ensures that regulatory agency inspectors who engage with business owners can use interpretation services to speak with LEP individuals at their establishments. Agencies involved in Small Business First have also created multilingual informational materials so business owners have the information they need to comply with the laws.
- The Human Resources Administration translated content on its website into six languages and launched a multilingual website to raise awareness about SNAP. It regularly engages advocates to hear about and address language access concerns and has an immigrant resources page on its website containing information about eligibility for the various benefit and entitlement programs.
- The City created the NYCWell website, which is available in 200 languages, and connects New Yorkers to confidential mental health support.



Office of
Immigrant Affairs
Nisha Agarwal
Commissioner

This Administration will continue to advance language access to improve equity across New York City

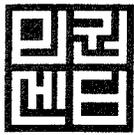
The de Blasio administration believes that the City must speak the languages of the New Yorkers we serve.

Just as IDNYC, New York's municipal ID program, helps all New Yorkers to participate more fully in civil society, improving language access is a critical way to assist more New Yorkers to thrive within the City.

And just like IDNYC is being replicated across the country, we want New York City to be a model for other municipalities as they address similar language access challenges.

MOIA supports codifying the substance and policies behind EO120 in the City Charter to help give these language access efforts a lasting effect.

We thank the Speaker for introducing Introduction 1181, and I look forward to working with the Council on this legislation as we continue to build a City that serves its diverse and multilingual communities in an equitable and just manner.



**STATEMENT TO COMMITTEE ON GOVERNMENTAL OPERATIONS ON
LANGUAGE ACCESS BILL INT 1181-2016
BY THE MINKWON CENTER FOR COMMUNITY ACTION
NOVEMBER 17, 2016**

The MinKwon Center for Community Action is dedicated towards serving and empowering the Korean American community, and working with the wider Asian American and immigrant communities to achieve economic and social justice for all. MinKwon places a special emphasis on meeting the needs of our most marginalized community members, including low-income, limited-English-proficient (LEP), and undocumented residents.

The MinKwon Center provides the under-served Asian American population in New York City (“NYC”) with a full range of free social and legal services, ranging from public benefits application assistance to full legal representation in housing, labor, and immigration cases. Through our work with the community, we have consistently found that one of the most hindering barriers to the Asian American community is its inability to access public benefits and assistance from city agencies due to high rates of linguistic isolation. 71 percent of the city’s Asian Americans are foreign-born, 43 percent of NYC’s Asian American households are linguistically isolated, and 60 percent of NYC’s Asian Americans are Limited English Proficient (62.5 percent of Koreans and 67.3 percent of Chinese Americans speak English less than “very well”) – all resulting in language, culture, and immigration status barriers that severely limit their ability to thrive in their own communities. This is a population who is less informed about existing support services, and less able to access the services anyway, due to linguistic inaccessibility or due to services not being culturally appropriate. As a result, the city’s Asian communities face systemic barriers to vital City services that can help them prevent or rise out of poverty.

Although Executive Order 120 was first implemented in 2008, LEP community members continued to face obstacles in requesting or obtaining services in their requested native language. Clients applying for SNAP were routinely given phone or in-person interviews in English even though they had specifically requested interpretation, sent untranslated documents, and told to come back or wait an unspecified amount of time at SNAP centers when seeking interpretation. Although the number of such incidents have declined over the years, it does still remain a significant issue.

Therefore, the MinKwon Center welcomes the Speaker’s language access bill in hopes that it will strengthen the implementation of Executive Order 120 and finally allow all residents of NYC, no matter their preferred language or country of origin, an equal chance at accessing the resources which are critically needed by so many immigrant communities. We look forward to continue working with the City to address the needs and concerns of the Asian American and immigrant communities.

Thank you.

**Written Comments of Cecilia Gastón, Executive Director of Violence Intervention Program
New York City Council Committee on Governmental Operations
Oversight Hearing: Assessment of NYC's Language Access Services**

November 17, 2016

My name is Cecilia Gastón and I am the Executive Director of Violence Intervention Program and I am here today as the organizational plaintiff in a case against the New York Police Department for failing to provide language access to Limited English Proficiency victims. Violence Intervention Program is a nationally recognized Latina organization dedicated to ending violence in the lives of women. VIP delivers a full range of culturally competent services that enable victims to become free of violence and achieve their full potential including NYC's only 24-hour Spanish & English hotline. Well over half of our clients have limited English proficiency and are directly impacted by the city's language access policies. What is spelled out in this document is a well-intentioned plan which among other things stipulates that city agencies should train their staff on language access policies and procedures and that said policies and procedures should incorporate information gathered from the service population in language access surveys. But this plan can only be effective in so much as it can be enforced and, quite frankly, it has no teeth.

Domestic violence victims trying to rebuild their lives need timely and meaningful access to various city agencies and this plan just simply does not do enough to ensure that the right of Limited English Proficiency individuals to communicate effectively is protected. It is precisely due to this plan's unenforceability that our clients are met time and time again with unqualified "interpreters". Just because someone was raised speaking Spanish with their grandmother, for example, does not make them qualified to provide competent Spanish language interpretation. Language interpretation includes not just translation but capturing comparable meaning from one language to another. Needless to say, there is a huge difference between being a speaker of another language and being a trained interpreter in that language and that distinction needs to be respected and codified into a New York City law that can be enforced. Victims need language access in its purest sense and a way to hold those city agencies accountable that do not comply. In short, having a language access plan does not guarantee having guaranteed qualified interpretation at all city agencies.



Coalition for Asian American Children + Families

FOR THE RECORD

**New York City Council - Governmental Operations Committee
Oversight Hearing - Assessment of NYC's Language Access Services
November 17, 2016**

**Testimony of Patricia Dayleg, Policy Manager
The Coalition for Asian American Children and Families (CACF)**

Good Afternoon. My name is Patricia Dayleg and I am the Policy Manager of the Coalition for Asian American Children and Families (CACF). I would like to thank the Governmental Operations Committee in holding this important oversight hearing on the assessment of NYC's Language Access Services.

For over 30 years, CACF has been the nation's only pan-Asian children's advocacy organization. We work to improve the health and well-being of Asian Pacific American (APA) children and families in New York City in three policy areas: education, health, and child welfare. CACF advocates on behalf of underserved Asian Pacific American families, especially immigrants struggling with poverty and with isolation due to limited English proficiency.

Many APA families in New York City are challenged by linguistic isolation, poverty, and a lack of familiarity with city social service systems. Our parents struggle to support their children in navigating their education; families are unaware of their rights as patients and unsure of resources available for health care; and individuals desperately need translated information delivered in a culturally competent manner. One CACF member reflected earlier this year that APA parents have experienced interpretation delivered in an incorrect language, have received inaccurately interpreted information, and that translated documents that they've received use words and phrases that they don't understand. City agencies need more resources and additional staff to fully meet the language needs of the Asian Pacific American children and families.

The Needs: APA individuals and families face a multitude of barriers to success, one of which is language access.

Limited English Proficiency: 35% of APAs living in New York City are Limited English Proficient, meaning that no one in a household above the age of 14 speaks English well.¹ This often forces children to serve as interpreters for their families, which causes additional stress and anxiety for the child and parents. For instance, limited English proficiency is also a barrier to parent participation in school events, discussions, and meetings about students' educational achievement as interpretation is not easily accessible.

Linguistic and Ethnic Diversity: There are over 100 Asian languages and dialects spoken in the US², and at least 40 Asian languages and dialects spoken in New York City.³ The diversity of languages and dialects spoken by APA families makes community outreach and education challenging, and without targeted outreach these communities will continue to be isolated.

¹ Salvo, Joseph. "New York City's Asian Population: One Million and Counting." City University of New York: AAARI Conference on Rethinking NYC's Asian American Communities May 5, 2014. <http://www.aaari.info/notes/14-05-05Salvo.pdf>

² National Education Association. <http://www.nea.org/home/15555.html>

³ "Distinct Places, Shared Opportunity: A Neighborhood-based Analysis of Asian Americans in NYC." Asian Americans for Equality, Inc., February 2011. http://www.nyc.gov/html/dc/downloads/pdf/asian_americans_for_equality_report.pdf

Limited Literacy in Native Languages: In addition to limited English proficiency and a diverse range of languages spoken, many APAs also have limited literacy in their native languages. This limitation underscores the necessity of partnering with community-based organizations and community members to engage in direct outreach to contact isolated families by phone, visits, or word of mouth.

Recommendations: CACF's member organizations are direct service providers who work closely with APA students and families. We meet with members regularly to discuss the needs and concerns that APA community members face. Our communities have reported innumerable difficulties in supporting their children's education and connecting with schools, especially due to language barriers.

CACF fully supports Intro 1181-2016 which seeks to improve access to city services for limited English proficient individuals by codifying and expanding upon Executive Order 120.

Immigrants must have access to quality translation and interpretation services in order to be engaged in their children's education, access the health care system when they need it the most, and understand their rights to services and resources they are eligible for.

Additionally, we recommend: improving City Agencies' data collection and reporting practices; providing cultural competency training for interpreters and front line staff; targeted community engagement; improved socio-emotional supports; and making City Agencies' language access plans more accountable and transparent to communities they serve. We feel these are all critical factors to ensure limited English proficient individuals can get the services they need.

CACF also supports the reporting of racial and socio-economic data, particularly on the crucial need to include the disaggregation of data. For the past 5 years, CACF has worked closely with the City Council and the Administration to pass legislation to collect and report disaggregated data in city and state social service agencies. On October 31, 2016, this became a reality when Mayor de Blasio signed a package of data equity bills (Intro 251-A, 551-1, 552-A) into law.

Intro 1181-2016 should leverage these data bills in helping to tracking the dynamic and growing, emerging populations in NYC. This will ensure that communities that need language services the most are receiving the proper linguistic and cultural appropriate resources for their families. The collection and reporting of disaggregated data would spotlight challenges and barriers that APA groups face in public services as many struggle with financial, linguistic and cultural barriers. The reporting of such data would also contradict prevailing perceptions of APA's as a homogenized well-to-do group.

CACF members have voiced the need for the inclusion of cultural competency training of interpreters and front line City Agency staff when interacting with LEP Asian Americans. These individuals are often intimidated about asking for interpretation for fear of imposing on staff or that there may be repercussions for their children and families. Cultural competency helps ensure that interpreters and front line staff are sensitive, that the interpreter uses colloquial language, front line staff are respectful and acknowledge cultural practices, and that LEP individuals feel comfortable engaging with City Agencies. Additionally, CACF encourages the City to implement cultural competency trainings for all City Agency staff; in a coherent, integrated, and systemized manner that discusses the challenges faced across races, ethnicities, gender identities, sexual orientations, religions, and physical/mental abilities.

New York City has been a leader on language access. We hope that you will continue to honor this commitment by implementing the suggestions contained in this letter. We welcome the opportunity to speak with you further about these issues. Thank you for considering our concerns and recommendations.

Testimony on 11/17/2016 -- Tsering Lama, Organizer, Adhikaar

My name is Tsering Lama. I am the Language Justice and Domestic worker organizer at Adhikaar. Adhikaar is the only women-led worker and community center that serves and organizes the Nepali-speaking immigrant and refugee community. We are one of the newest immigrant communities in New York City, and the majority of our members are low-wage workers. At Adhikaar, I teach English classes, citizenship classes and have provided Nepali and Tibetan interpretation in high risk legal, medical and school situations. From this first hand experience, I know that our city's services can do much better to serve communities with limited english proficient individuals.

Adhikaar has worked hard to give our community a fighting chance to live a healthy and productive life in New York City. We've seen victories and know that language justice solutions are possible. Just recently, regulatory and legislative changes were made to include Nepali, Tibetan and Vietnamese options for the nail technician licensing exams. Government documents about nail salons are now available in Nepali and Tibetan. These types of systemic changes reflect an understanding of not just blanket language resources, but what resources are most needed by which populations. They help low-wage workers access their rights. There are many industries, agencies and institutions that can better serve the people who use their services most frequently.

Just a few weeks ago, I accompanied a long-time community member and English class participant as she attempted to navigate communications with her child's school. Her son, a 10 year old with special needs, needed additional support while getting on the bus to come back home. As the situation escalated, the principal, transportation officials, police officers all

struggled to simply get in touch with the mother, not realizing that language services could be accessed, not even having it on file that they needed to consider this before moving to the next step. The child was taken to a hospital, and due to the rushed admittance, more than 24 hours passed before the child was discharged. I was able to help her field calls, work with officials, help her navigate to the hospital in Westchester. He was released in spite of the many institutions that should be able to provide support to vulnerable mothers and children. They were made to feel out of place, like their limited English capability was a reason to be cast aside and not dealt with properly.

We seek to increase access to in-language information and services by translating documents and developing a core group/staff of trained interpreters. We have expanded the reach of our classes and developed new resources, but we need the city to do its part too. Every week we hear from women trying to get help in situations of domestic violence, who make it to the website of a city service, but end up staying in a dangerous situation because an interpreter wasn't available. As low-incidence languages, Nepali and Tibetan are not covered by language access policies at City, State, or Federal levels. We see the possibility for the mother I worked with to not only communicate during emergency situations, but to one day comfortably attend parent teacher conferences. After more than 5 years of accompanying her from one institution to the next, we haven't seen an improvement. We urge you to remember her story, and consider the places that low-wage workers and our most vulnerable immigrant families visit frequently, where they receive vital communications from and need assistance from the most. We need leadership to take on this responsibility, and make it clear to all parts of the system that language justice is a priority.

Good afternoon, and thank you to the members of the Council for convening this hearing and to New York City Council Speaker Melissa Mark-Viverito for her continued leadership on behalf of immigrant communities.

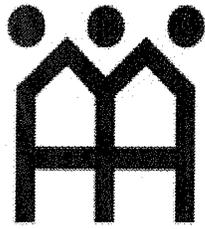
My name is Tiffany Wheatland and I'm a Manager for Community Engagement at the New York Immigration Coalition. We are an umbrella policy and advocacy organization with nearly 200 members across New York State. We aim to achieve a fairer and more just society that values the contributions of immigrants and extends opportunity to all.

In February of 2016, in her annual State of the City address, Speaker Mark-Viverito stated the need for justice for our immigrant communities. Key to achieving this goal is ensuring that immigrant communities are able to access the broad City services available to them and communicate with City officials. The landmark 2011 **Executive Order 120**, which requires that all City agencies that provide services to the public create a language access plan to ensure that those that do not speak English can still access city services, brought us closer to fuller immigrant inclusion in New York City. However, the provision of City services in only six languages is simply not enough. In a city where there are more languages spoken than nations recognized by the United Nations, we must not only codify language access protections but increase the number of languages mandated. Without such actions, many immigrants across New York City will continue to face political and economic marginalization.

There are five key points we would have the Council consider:

1. This is an opportunity to codify the language access executive order (EO 120, [here](#)). While the order explicitly states how the top 6 languages should be determined, it currently does not say how frequently these languages should be re-assessed. This reassessment is vital, given that there are changing demographics within NYC and fast-growing populations, thus language access needs are changing with time.
2. Intro 1181 creates the hypothetical of an agency providing language access services in 12 languages (if the results of the survey demonstrate that there are an additional 6 languages that clientele need services in). However, given that Intro 1181 does not require that the surveys be distributed to and collected from a certain percent of the clientele population, the results may not truly reflect the language access needs of a specific agency's clientele.
3. The current method used in EO 120 to determine the top languages spoken in NYC (Department of City Planning, Census Data) does not take into account a second language that may be spoken by limited English proficient (LEP) individuals. This is particularly relevant for LEP French and Arabic speakers. For this reason, the City should reexamine the methodology used to determine top languages.
4. NYC is home to thousands of immigrants and 6 languages is not sufficient to meet the language access needs of this city's residents. The City should use this opportunity of codifying EO 120 to increase the floor of 6 languages to 8 languages, at a minimum. Maintaining only 6 languages dismisses the needs of an entire community of immigrants, namely African and Asian immigrants who need services in French and Arabic.
5. It is critical that Intro 1181 not hinder the language access provision within agencies requiring services in more than 6 languages, such as the Department of Education.

In New York State, home to the one of the largest immigrant populations across our nation, we have failed to provide meaningful language access for a diverse array of speakers from Africa and the Middle East. We are calling upon the Council to act expediently to codify both language access protections and EO 120, increasing the floor of languages from six to eight, at minimum.



亞洲人平等會

房屋及社區服務部

Asian Americans for Equality

Housing & Community Services

AAFE TESTIMONY IN SUPPORT OF

INT. NO. 1181

PRESENTED BEFORE:

THE COMMITTEE ON GOVERNMENTAL OPERATIONS

PRESENTED BY:

DONNA CHIU, ESQ.
DIRECTOR OF HOUSING AND COMMUNITY SERVICES
ASIAN AMERICANS FOR EQUALITY (AAFE)

November 17, 2016



Asian Americans for Equality

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My name is Donna Chiu and I am the Director of Housing and Community Services at Asian Americans for Equality (AAFE). I am here to testify in support of the Speaker's language access bill Intro 1181.

AAFE is a non-profit organization with a community office based in and serving Chinatown and the Lower East Side for over 40 years. In recent years, AAFE's services have expanded to include satellite offices in Sunset Park, Brooklyn, and Jackson Heights and Flushing in Queens. We pride ourselves in assisting New York's most vulnerable residents, which include senior citizens, people with disabilities, working poor families, and new immigrants. In the past year alone, AAFE served approximately 850 clients just on housing-related matters.

AAFE is also a member of the Stand for Tenant Safety Coalition (STS). STS is a citywide coalition of community organizations working with residents to fight back against their landlords using construction as a harassment tactic. Through this community driven effort, we have organized and assisted tenants to access services from the New York City Department of Buildings (DOB) and New York City Housing Preservation and Development (HPD).

In my work as the Housing Director at AAFE, I have witnessed first-hand the language access issues today's bill seeks to address. Because I am a housing attorney and a native Chinese-Cantonese speaker, I've had the pleasure of assisting monolingual, Chinese New Yorkers for over 10 years. My testimony today will focus on their experiences and challenges in accessing City housing and tenant services.

Since 2008, when Mayor Bloomberg signed the City's first Language Access Executive Order, I have noticed improvements by HPD, DOB and the Department of Finance in their administration of the New York City Senior Citizen Rent Increase Exemption (SCRIE) program. I have interacted with these agencies on behalf of limited-English proficient (LEP) clients on countless occasions.

However, these improvements have not been enough for LEP New Yorkers to have meaningful, equal language access to City services. Eight years after Executive Order 120 was signed, the most popular service at our offices is still assisting LEP clients to translate notices and documents from City agencies and assisting them to fill out forms for City services. Since Executive Order 120 was signed, I noticed that letters sent by HPD's Emergency Services Bureau now includes a translation of the English content. However, the notices ask the residents to call HPD. The caller cannot communicate with HPD staff unless she speaks and understands English.

On countless occasions, I've had to help my client call the HPD number on these notices because the HPD employee only spoke English. I have also helped my client leave a message, but learned later that my assistance was futile because the HPD employee who calls the tenant back only speaks English. The tenant, not knowing who or what the call is about, then hangs up on HPD. I've also served as an interpreter for my clients on countless occasions when the HPD

inspector, who appears at the tenant's door to inspect her apartment, do not speak her language. This, despite noting for the 311 operator, that she would need the assistance of an interpreter in order to communicate with an inspector who only spoke English. I have spent countless hours helping my clients interpret and make these calls in English because the alternative would be for HPD to close these housing standard violation cases.

AAFE clients routinely come to our neighborhood offices for assistance to translate their SCRIE notices and letters and renewal applications that are sent only in English. Again, my colleagues and I have spent countless hours translating these documents to the LEP tenants and assisting them in filling out the forms.

But what really worries us are all the senior citizens, people with disabilities, and new immigrants who do not know about us or cannot come to our office for assistance. Who will help them translate the documents they received so they can respond within the short deadline given? In these situations, City agencies become critical first responders. If the agency's staff cannot communicate with its customers, how can it assist the customer?

This is why AAFE applauds the Speaker's initiative in Intro. 1181 that expands the categories of documents agencies must translate into the top six languages, develop and implement a language access survey, and increase an agency's staffing capacity to better address these language access issues. I see in the Speaker's initiatives a different way of thinking about LEP New Yorkers as actual people with real needs and not simply as problems to get rid of. Intro 1181 recognizes that meaningful equal language access is a critical component of delivering services to New Yorkers. Thank you for your time.

Legal
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TESTIMONY OF LEGAL SERVICES – NYC

New York City Council, Committee on Governmental Operations

Hearing on November 17, 2016

Good afternoon. My name is Christine Clarke. I am the Director of the Civil Rights Justice Initiative at Legal Services NYC, which represents some 80,000 low-income New Yorkers every year. Throughout LSNYC, we represent tens of thousands of New Yorkers who do not speak English well. In my practice in particular, we frequently represent clients in litigation where our clients have been denied access to government services because of their inability to speak, read, or understand English.

Firstly, let me say that there is no question that today, immigrants residing in New York City who do not speak English well are frequently entirely unable to access important governmental services. I have, in the past month alone, spoken with individuals who have been unable to access police services, who have been unable to access life-sustaining benefits, and who have been unable to communicate with the public and private school teachers and administrators charged with educating their children – all due solely to the fact that the individual does not speak English well and the institutions in question not only failed to provide language services, but in some instances refused outright, even when those services were explicitly requested.

This year, we also conducted a survey of 227 community groups, individual community members, and elected officials about the most pressing needs of low-income New Yorkers. We asked whether and to what extent low-income New Yorkers face difficulties accessing government services due to language barriers. The overwhelming response was that low-income New Yorkers unquestionably face barriers out of poverty because of language based discrimination. By far, the most common concern raised by those interviewed was the simple fact that *virtually all* government agencies are difficult to access for New Yorkers with limited English proficiency (LEP).

Legal
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Unit

Legal
Services NYC

Therefore, we would like to applaud the City Council and Speaker Mark-Viverito for taking up this issue. It is absolutely crucial for our low-income LEP clients that they be able to communicate with City agencies and for City agencies to effectively communicate with them. This City – and this City Council in particular – has fought so hard to make this City welcoming and safe for low-income New Yorkers. We am thrilled that our elected representatives so fully understand the importance of translation and interpretation services in order ensure that these hard-fought services, benefits, and protections are available to *all* New Yorkers, no matter where they were born or what language they speak.

I believe that the City Council and the Speaker are therefore intending to introduce legislation which will guarantee and secure the right of all New Yorkers to meaningful access to our government services. However, I am concerned that the legislation as written may be interpreted in a way which might defeat this intent. A language and framework which is suitable to an Executive Order may not be equally suited to legislation.

For example, the Equal Access to Human Services Act is a law which advocates and many passionate City Councilmembers fought to pass. The Act, unlike Intro 1181, explicitly required that agencies themselves must provide interpretation and translation to members of the public seeking crucial services or information. However, despite this very clear language, the New York Supreme Court and the Appellate Division both held that this law was unenforceable because it did not explicitly include a private right of action. As a result, our clients had to rely on other City laws in order to enforce what we believe was the intent of the drafters of that Act. The Equal Access to Human Services Act, therefore, remains unenforceable to those people who are negatively affected when that Act's terms are violated. It is crucial that the actual LEP individuals suffering language-based discrimination be able to enforce their right to receive meaningful access to government services.

Intro 1181 does not include clear language concerning a private right of action and, further, does not include explicit and unequivocal language that requires City agencies to provide interpretation and translation services to members of the public. In fact, there exists a distinct possibility that Intro 1181 could be misinterpreted to place obligations only on the Office of Language Services, and that such obligations extend only so far as requiring the office to “work with” some City agencies to create a plan, which plan must have certain provisions. Similarly, the language of the bill could be, I believe, erroneously misinterpreted as not covering all City

agencies that provide crucial services or information to the public, as it is currently limited to only those agencies which have “program beneficiaries or participants.” Who, for example, is a “program beneficiary or participant” of 311, a City service which currently provides substantial language access and which New Yorkers rely on for crucial information and services. Similarly, the language of the present bill could be misinterpreted as requiring less than existing Federal or City law with respect to what kinds of documents must be translated, as the current language of the bill focuses on the frequency with which documents are disseminated to the public rather than the importance of the information contained in the document, as is the focus of federal law under Title VI of the Civil Rights Act of 1964.

However, Intro 1181 does include a provision requiring language access surveys, which will consider a number of factors other than the mere prevalence of a given language in a U.S. Census Tract. This is a welcome development. The surveys would be given greater meaning and import, however, if they were taken into account in determining which languages agencies must provide interpretation and translation in, which the current language of the bill does not make clear.

The reference to interpretation in the bill as it is currently written limits the number of languages for which interpretation is to be provided. Given that every agency in the City of New York currently has access to Language Line, which provides immediate interpretation over the telephone in 170 languages, we do not believe there is any need to limit interpretation to only the top six most common languages.

It may be useful to look at other language access laws for guidance. For example, New York State Executive Order 26, signed by Governor Cuomo in 2011, explicitly requires that agencies themselves must provide language services, that agencies must translate all “vital documents,” and that agencies shall provide interpretation. Executive Order 26 moreover did not limit the languages for which agencies must provide interpretation.

Similarly, federal civil rights law also requires interpretation and translation without specific limitations on the number of languages or even the types of documents. Rather, federal law employs a balancing test which is intended to ensure that agencies that provide important services or information take *reasonable steps* to provide *meaningful access* to individuals with limited English proficiency. Thus, given the access City agencies already have to Language Line, existing federal law certainly could not be read to limit the languages for which interpretation

must be provided, as interpretation in any language is essentially equally accessible to agency staff. Moreover, the focus on “meaningful access” in federal law has been interpreted by the federal executive branch and administrative agencies as requiring that “vital documents” be translated – meaning, that the question of what documents should or should not be translated rests on a question of the importance of the information contained in the communication.

Another relevant law which may provide guidance is the New York City Human Rights Law, whose prohibition on national origin discrimination similarly requires that City agencies not discriminate against people who do not speak English well. I do not believe that the current bill is intended in any way to *narrow* the protections already afforded by the Human Rights Law, nor do I believe it could even be fairly interpreted as doing so. Nevertheless, it is important to note that there is not language in the bill currently which makes this explicit. Clear language can serve as a bulwark against future misinterpretation.

As the Speaker and the City Council is aware, however, the fact that laws already exist which prohibit language-based discrimination and require language services, certainly does *not* mean that our low-income immigrant clients would not benefit enormously from a clear mandate from the City requiring all City agencies provide language services to the public. I am *incredibly* encouraged that this Council and the Speaker in particular are interested in taking steps, including by introducing Intro 1181, to protect the rights of all New Yorkers to have equal access to governmental services. We absolutely applaud these efforts. Such efforts are incredibly important to my clients, now more than ever.

In our current political climate, where xenophobia, Islamophobia, and anti-immigrant sentiment have proven to be pervasive and virulent, this City can be a beacon of light which makes clear to our immigrant neighbors, friends, and family, that they are not only welcome in our City, but that they are equal in the eyes of the law and that our City government represents all of us. Ensuring that our City government and every public-facing City agency provides interpretation and translation to limited English proficient New Yorkers will unquestionably reassure all of us – and low-income immigrant New Yorkers in particular – that we are all equal citizens of this great City.

Thank you.

PUBLIC TESTIMONY

FOR THE RECORD

ON

**IMPROVING ACCESS TO CITY SERVICES FOR LIMITED ENGLISH
PROFICIENT INDIVIDUALS**

PRESENTED BEFORE:

THE NEW YORK CITY COUNCIL
COMMITTEE ON GOVERNMENTAL OPERATIONS

PRESENTED BY:

Danielle Alvarado
Urban Justice Center

November 17, 2016

Good afternoon, my name is Danielle Alvarado and I am an Immigrants' Rights Staff Attorney at the Urban Justice Center's Community Development Project ("CDP"). CDP's vision is to strengthen the impact of grassroots organizations in New York City's low-income and other excluded communities by partnering with community groups to win legal cases, publish community-driven research reports, assist with the formation of new organizations and cooperatives, and provide technical and transactional assistance in support of their work towards social justice. CDP's five practice areas are workers' rights, housing, immigrants' rights, consumer justice, capacity building, and research and policy. All of our practice areas dedicate significant resources to working with immigrant New Yorkers; many of our clients struggle on a daily basis to access critically important services and protections because of their limited English proficiency ("LEP").

I am pleased to testify today on behalf of CDP to offer support for Int. 1181-2016, which will strengthen the City's commitment to language access by expanding upon Executive Order 120. In particular, CDP supports provisions that instruct agencies to adopt additional priority languages based on service population and that provide more meaningful mechanisms for ensuring that agencies design and implement plans consistent with City policy.

In 2015, CDP issued a report with CAAV: Organizing Asian Communities entitled "*No Access: The Need for Improved Language Assistance Services for Limited English Proficient Asian tenants of the New York City Housing Authority*," that highlighted the tremendous impact of inadequate language access implementation on New York City Housing Authority (NYCHA) tenants. The report's findings and recommendations are relevant to the proposal being considered today.

The report focused on the experiences of NYCHA tenants who speak Asian languages including Urdu, Punjabi, Bengali, Korean, Cantonese, and Mandarin. As speakers of "non priority" City languages who nonetheless constitute more than 5% of New Yorkers living in NYCHA managed units, survey respondents overwhelmingly reported being unable to access resources and services in a language they understood. Less than half had successfully obtained spoken interpretation services, and less than one in five had received a written translation of a housing-related document. Almost all tenants had signed documents in English without translation. Further, NYCHA signage regarding language services was often only available in Spanish, Chinese, and Russian.

In the housing context, issues of language access have serious implications for tenants' health, safety, and sense of belonging. Tenants who cannot communicate with NYCHA regarding improper rent increases may be taken to housing court; tenants who are survivors of domestic violence may not be able to communicate emergency housing needs; and families may be unaware of unsafe conditions in their apartment due to an inability to communicate with NYCHA staff regarding repairs. This disconnect between the City priority languages and a

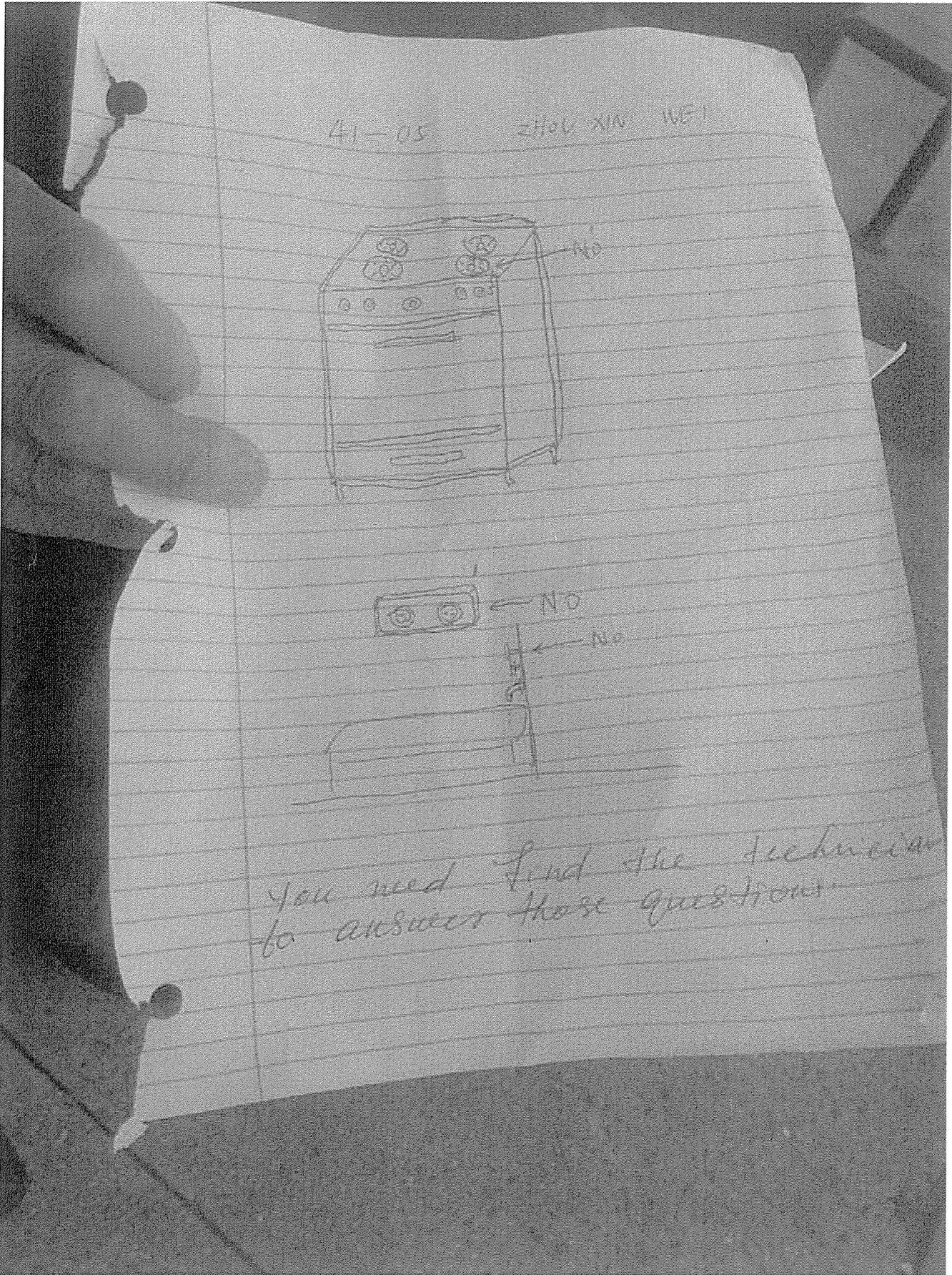
specific agency's service population in this case underscores the importance of the provision directing agencies to adopt additional priority languages when appropriate.

In addition, CDP supports provisions that are intended to ensure that agencies actually develop plans that reflect the needs of their specific service populations. To date there has been significant variation across agencies in the quality and extent of client needs assessment. When agencies do not conduct their own surveys, the City priority languages function as a ceiling rather than a floor. Further, CDP shares our partners' concerns that data resulting from poorly designed or inconsistent surveys significantly undercounts certain communities, including multilingual immigrants from Africa. In particular, inconsistent survey design undercounts the number of French or Arabic-speaking immigrants, who may speak another, less common language in their home. We encourage the City to consider strengthening the biannual survey questions to ensure consistency across agencies.

Finally, CDP urges the City consider expanding the number of City-wide "priority languages" and the factors considered in identifying them. Int. 1181-2016 directs agencies to consider several factors in addition to population size, including frequency with which LEP individuals come into contact with the agency and the consequences of inadequate language access or poor interpretation; we believe such factors would be appropriate to consider at the City level as well. Or, if the City continues to rely on population size alone, it should expand to at least eight priority languages. Expanding the number of priority languages will help ensure that immigrant communities that are more vulnerable due to socioeconomic status and length of time in the country are adequately served at both the City and agency level. We echo our partners' concerns today about inadequate access for French and Arabic speakers in particular.

As we are all aware, the urgent need to ensure that the City offer expansive and meaningful protections to all its residents is clearer than ever. Language access is an essential part of maintaining a City in which all immigrant communities are truly welcome and given equal opportunity to thrive. Int. 1181-2016 is an important step forward in that effort.

Thank you for the opportunity to testify today.





Testimony from CAAAV Organizing Asian Communities
55 Hester Street New York, NY 10002, (212) 473-6485, www.caaav.org

Int 1181-2016- Improving access to city services for limited English proficient individuals

CAA AV Organizing Asian Communities was one of many organizations who fought for Executive Order 120. We believe that it was a great step forward in ensuring access for the millions of limited English proficient (LEP) immigrants in New York City and their ability to access services and information directly from the City. We support Intro 1181-2016 in its effort to ensure that there are plans and policies in place to expand language access for the current city agencies mandated by the Executive Order 120. However, we are here to address an additional need for the expansion of the Executive Order and this bill.

Since we won the signing of Executive Order 120; CAAAV has been organizing Bangladeshi, Korean, and Chinese immigrants in Queensbridge Houses where the tenants we work with experience major barriers around access to repairs and services. Accessing services and repairs with NYCHA is already difficult in English, another layer is added onto LEP immigrants. In 2015, we released a report where we surveyed 211 NYCHA Asian immigrant residents in Chinese (Mandarin/Cantonese), Korean, Bangla, Urdu, and Arabic. Our report found that more than half (64%) of the residents do not receive translation from NYCHA. In addition, more than 70% of non-English speaking tenants had not been able to talk to someone who spoke their language when they called NYCHA's Customer Contact Center to request a repair. We have countless stories of tenants who haven't been able to communicate with NYCHA to seek essential repairs. More recently, there was a tenant whose neighbor had passed and he wasn't able to communicate with NYCHA about the smell of the decomposing body and the flies that surrounded the building. As a result, his building was plagued with the condition for weeks before it was resolved.

Although we know that this hearing is for Intro 1181-2016 to expand Executive Order 120, we do want to share recommendations residents have developed. Some of the recommendations are similar to those already outlined in this bill - 1) providing interpretation/ translation services, training workers, and creating public awareness strategies; 2) survey and collect accurate data on languages spoken in households. Others include: 1) expanding their current languages of English, Spanish, Russian, and Chinese to include Korean and Bangla, 2) office hours in-language at developments with language needs or someone who can travel to the different sites with designated office hours. Additional recommendations are in our report, *No Access* (see attached).

We hope there will be a future consideration of expanding Executive Order 120 or identifying mechanisms in which NYCHA will be included. They are accountable to 600,000 residents, 20,000 of who are Asian immigrants who are left out of the dark because of language barriers. The more who are informed, the more agency New Yorkers have.

NO ACCESS

THE NEED FOR IMPROVED LANGUAGE ASSISTANCE SERVICES FOR LIMITED ENGLISH PROFICIENT ASIAN TENANTS OF THE NEW YORK CITY HOUSING AUTHORITY

EXECUTIVE SUMMARY

통역하자! 통역하자!

翻譯服務是我們的基本人權

আমরা বাংলা ভাষায় সেবা চাই

A REPORT BY CAAV: ORGANIZING ASIAN COMMUNITIES
AND THE COMMUNITY DEVELOPMENT PROJECT AT THE URBAN JUSTICE CENTER

EXECUTIVE SUMMARY

More than 400,000 New Yorkers live in public housing developments run by the New York City Housing Authority (NYCHA).¹ For them, NYCHA is property manager, landlord and super. NYCHA systems and staff are the points of interface for repair issues, rental payments, emergency information and more.

For NYCHA tenants with limited proficiency in English, navigating the policies, procedures and paperwork associated with their housing can be fraught with challenges. Issues of language access have serious implications. Tenants whose rents are raised incorrectly may be taken to housing court for non-payment of rent because they were not able to communicate with NYCHA to resolve the error. Tenants may be forced to miss work because they have to schedule repeated meetings in an attempt to communicate their needs. Victims of domestic violence who are in need of emergency housing transfers may not be able to make that need known. The safety of tenants' apartments can be jeopardized by a lack of language access in the repairs process. Crucial housing information, such as emergency protocols, may not reach tenants because they are not translated. Lack of language access impacts the day-to-day experience of tenants in interaction with NYCHA staff and their ability to participate meaningfully in the NYCHA community, perpetuating isolation.

CAAHV: Organizing Asian Communities in partnership with the Community Development Project at the Urban Justice Center has conducted research on the experience of limited English proficient Asian tenants living in NYCHA. Our findings reveal that NYCHA is not executing its current language access policies in full, and that those policies, even if fulfilled, fall short of meeting the needs of Asian tenants.

In May of 2015, Mayor de Blasio and Shola Olatoye, NYCHA's Chair and CEO, announced a ten-year plan for NYCHA reforms, titled "NextGeneration NYCHA."² The stated goals of the plan include stabilizing NYCHA's financial situation, operating as an efficient and effective landlord, (re)building and preserving housing stock, engaging residents, and connecting residents to services.³ This presents an opportune moment to review and reform NYCHA's language access services and processes. As NYCHA takes stock of its current challenges and plans for the future, limited-English proficient tenants must not be left behind.

RESEARCH FINDINGS

For this research, CAAHV administered surveys to 221 NYCHA tenants from 14 developments. Survey data was complemented by an analysis of documents received in response to a Freedom of Information Law (FOIL) request, secondary source and legal background research, and interviews with limited-English proficient tenants. Key findings include:

1: NYCHA is Not Providing Language Access Services to Most LEP Asian Tenants Who Need These Services.

- Of surveyed tenants who had a need for spoken interpretation in the past three years, only about 40% were connected with NYCHA to request services.
- Of those who had a need for written translation of a housing-related document, fewer than 1 in 5 (18%) connected with NYCHA to request services.

2: Family and Friends are Filling the Gap.

Despite NYCHA's policy that informal interpretation and translation (by family members, children or friends) should be discouraged, in practice, tenants must rely on family and friends.

- 86% of non-English speaking tenants who needed written translation asked someone who does not work for NYCHA to help translate.
 - Of these tenants, 66% asked a family member to translate, and 21% asked a friend.
- Similarly, 74% non-English speaking tenants who needed spoken interpretation asked someone who did not work for NYCHA for help with interpretation.
 - Of these tenants, 71% asked a family member and 22% asked a friend.

3: NYCHA Does Not Comprehensively Identify or Track Tenants Who Need Language Access Services.

- No comprehensive census of NYCHA tenants is taken to identify language needs.
- The Language Identification cards that are intended for use by NYCHA staff are not being presented to LEP Asian tenants: more than 90% of non-English speaking tenants had not been given a card.

4: NYCHA Does Not Effectively Inform LEP Asian Tenants of Language Access Services.

- NYCHA's advertising of language access services is limited in scale and scope. Much of the advertising is presented in only three non-English languages (Spanish, Chinese and Russian) and sometimes only in Spanish, and these advertisements are not sufficiently widespread.

5: NYCHA's Customer Contact Center (CCC) and Repairs Process are not accessible to LEP Asian Tenants.*

- Nearly one in three (31%) non-English speaking tenants reported that there was a time when they decided not to request a repair via the Customer Contact Center (CCC) because they did not think they could talk to someone in their language.
- Of non-English speaking tenants who called the CCC to request a repair, more than 70% had not been able to talk to someone who spoke their language.
- Of non-English speaking tenants who had been asked to sign something related to a repair in their apartment, 92% had been asked to sign a repair-related document that was *not* written in their language.

6: NYCHA's Language Access Staffing Structure is Not Sufficient to Meet the Needs of LEP Asian Tenants.

- NYCHA has a small language access staff—only six people for the entirety of the of NYCHA population (over 400,000 people). Only two of these staff people speak an Asian language (Cantonese and Mandarin).
- NYCHA relies on employee volunteers to supplement language access services. Asian languages are not sufficiently represented among this volunteer bank. In addition, while it is admirable that employees volunteer in addition to their regular job duties, volunteer service is not a desirable way to comprehensively meet the needs of tenants.

7: NYCHA Does Not Have Mechanisms In Place to Solicit, Evaluate Or Utilize Feedback From Tenants About Language Access Services.

- More than two-thirds (67%) of non-English speaking surveyed tenants did not believe that NYCHA took sufficient steps to communicate with them in their language, however NYCHA does not currently have mechanisms in place to solicit, evaluate or utilize comprehensive feedback from tenants with limited English proficiency.

* Note that the discussion of reforms to NYCHA proposed by the de Blasio administration have included the prospect of closing the call center and instead processing repair requests through the City's 311 system. In the event of such a change, all findings and recommendations related to the CCC should be applied to 311's system to ensure that LEP tenants have meaningful access.

RECOMMENDATIONS

Language access issues impact tenants' ability to understand crucial housing matters, and can impact their health, safety, the stability of their housing, and their sense of belonging to NYCHA's community. Our research shows that language access services are lacking, and tenants suffer as a result. Key recommendations are highlighted below, and expanded upon in the full report.

We call on NYCHA to:

Conduct Comprehensive Assessment and Tracking of LEP Population.

- Take additional steps to identify and track tenants with limited English proficiency, including implementing a comprehensive census on the languages spoken by NYCHA tenants and developing a single, centralized database to track the language service needs of limited English proficient tenants.

Inform Tenants of Language Access Services.

- Disseminate information about language access services widely, and ensure that information about available services is shared in the languages tenants speak.
- Develop strategies to ensure that tenants with low levels of literacy in their primary language are notified of NYCHA policies and services.

Provide High Quality, Professional Language Access Services through Targeted and Streamlined Systems.

- Arrange for language access services proactively, whenever possible.
- Tailor language services to developments with limited-English proficient tenants, including translating all signage, forms and informational materials into the languages spoken at the development, and holding language-specific "office hours" in the languages that tenants speak.
- Ensure that non-English speakers can successfully navigate the CCC system, and the 311 system in the event that repair requests are directed to 311.
- Ensure that the repair process is accessible to tenants with limited English proficiency.

Ensure Language Access in Key Areas of Tenant Community: Community Centers and Tenant Associations.

- Support expanded language access at NYCHA community centers and Tenant Associations.

Ensure Language Access Services Receive the Appropriate Resources.

- Dedicate sufficient resources for language access staffing and services, including:
 - o Increasing the staffing of the language services unit to meet the needs of tenants.
 - o Identifying and allocating sufficient resources to improve language access services.
 - o Ensuring that senior services, services for people with disabilities, and other services at NYCHA are sufficiently resourced and equipped to offer language assistance.
 - o Offering supplemental funding for interpretation and translation to Tenant Associations and Community Centers in developments where more than 10% of residents are not English proficient.

Ensure Clear Systems for Quality Assurance, Tenant Input, Collaborative Evaluation of Language Access Services.

- Update and publish NYCHA's language access plan.
- Widely advertise the new 311 language access complaint system.
- Include tenants and community groups as partners in evaluating and improving language access services.

ENDNOTES

1 New York City Housing Authority Website. "About NYCHA." <http://www.nyc.gov/html/nycha/html/about/factsheet.shtml> (Retrieved 6/3/2015)

2 The Official Website of the City of New York, Office of the Mayor. "De Blasio Administration Unveils 'NextGeneration NYCHA': A Comprehensive Plan to Secure the Future of City Public Housing." <http://www1.nyc.gov/office-of-the-mayor/news/325-15/de-blasio-administration-nextgeneration-nycha--comprehensive-plan-secure-future#/0> (Retrieved 6/3/2015)

3 The Official Website of the City of New York, Office of the Mayor. "NextGeneration NYCHA." <http://www1.nyc.gov/assets/nycha/downloads/pdf/nextgen-nycha-web.pdf> (Retrieved 6/3/2015).

ABOUT THE AUTHORS



CAA AV works to build grassroots community power across diverse poor and working class Asian immigrant and refugee communities in New York City. Through an organizing model constituted by five core elements- basebuilding, leadership development, campaigns, alliances, and organizational development- CAA AV organizes communities to fight for institutional change and participates in a broader movement towards racial, gender, and economic justice.

**URBAN
JUSTICE
CENTER**



COMMUNITY DEVELOPMENT PROJECT

COMMUNITY DEVELOPMENT PROJECT AT THE URBAN JUSTICE CENTER

The Community Development Project (CDP) at the Urban Justice Center strengthens the impact of grassroots organizations in New York City's low-income and other excluded communities. We partner with community organizations to win legal cases, publish community-driven research reports, assist with the formation of new organizations and cooperatives, and provide technical and transactional assistance in support of their work towards social justice.



Asian American Federation

STATEMENT SUBMITTED TO THE COMMITTEE ON GOVERNMENTAL OPERATIONS OF THE NEW YORK CITY COUNCIL

Hearing on Proposed Bill Int 1181-2016 - Improving access to city services
for Limited English Proficient individuals

November 16, 2016

Thank you to Chairperson Kallos and the Committee on Governmental Operations for convening this hearing. I am Jo-Ann Yoo, executive director of the Asian American Federation. The Federation's mission is to raise the influence and well-being of the pan-Asian American community through research, policy advocacy, public awareness, and organizational development. Established in 1989, the Federation is a pan-Asian nonprofit organization representing a network of nearly 60 community service agencies in the Northeast. These agencies work in the fields of health & human services, education, economic development, civic participation, and social justice.

The Asian population continues to be the fastest-growing group in New York City, averaging an annual growth of 2.9% from 2010 to 2015, a rate that outpaces the Hispanic population, which only grew at a rate of 1.2% in that same time period. Asians now represent 10% or more of residents in 26 out of 51 Council Districts. Immigrants make up 7 in 10 Asians in the city. By the City's own estimates from the Center for Economic Opportunity, more than one in four Asians live in poverty in New York City, yet Asian households are less likely to receive assistance. Only 31% of Asians in households that meet the income requirements for SNAP actually receive them, compared to 52% of all residents in potentially eligible households. Not only that, the community organizations that serve Asians are also underfunded. Despite the rapid growth in the Asian community and the persistent demand for culturally- and linguistically-competent services, only 1.4% of contract dollars from city social service agencies went to programs run by Asian-led community organizations or programs aimed at serving mostly Asian clientele.

We applaud the City Council's efforts to codify the best practices of language access. Currently, a mix of language access policies specific to each agency exists, which creates some confusion among constituents regarding availability and quality of language services. The Federation suggests the following recommendations for the proposed law:



Asian American Federation

Snapshots of Asian Americans in New York City Council Districts

2016

Definitions

Children – New York City residents age from 0 to 17 years old.

Seniors – New York City residents age 65 years or older.

Voting-Age Citizens – New York City residents who are citizens and are 18 years or older.

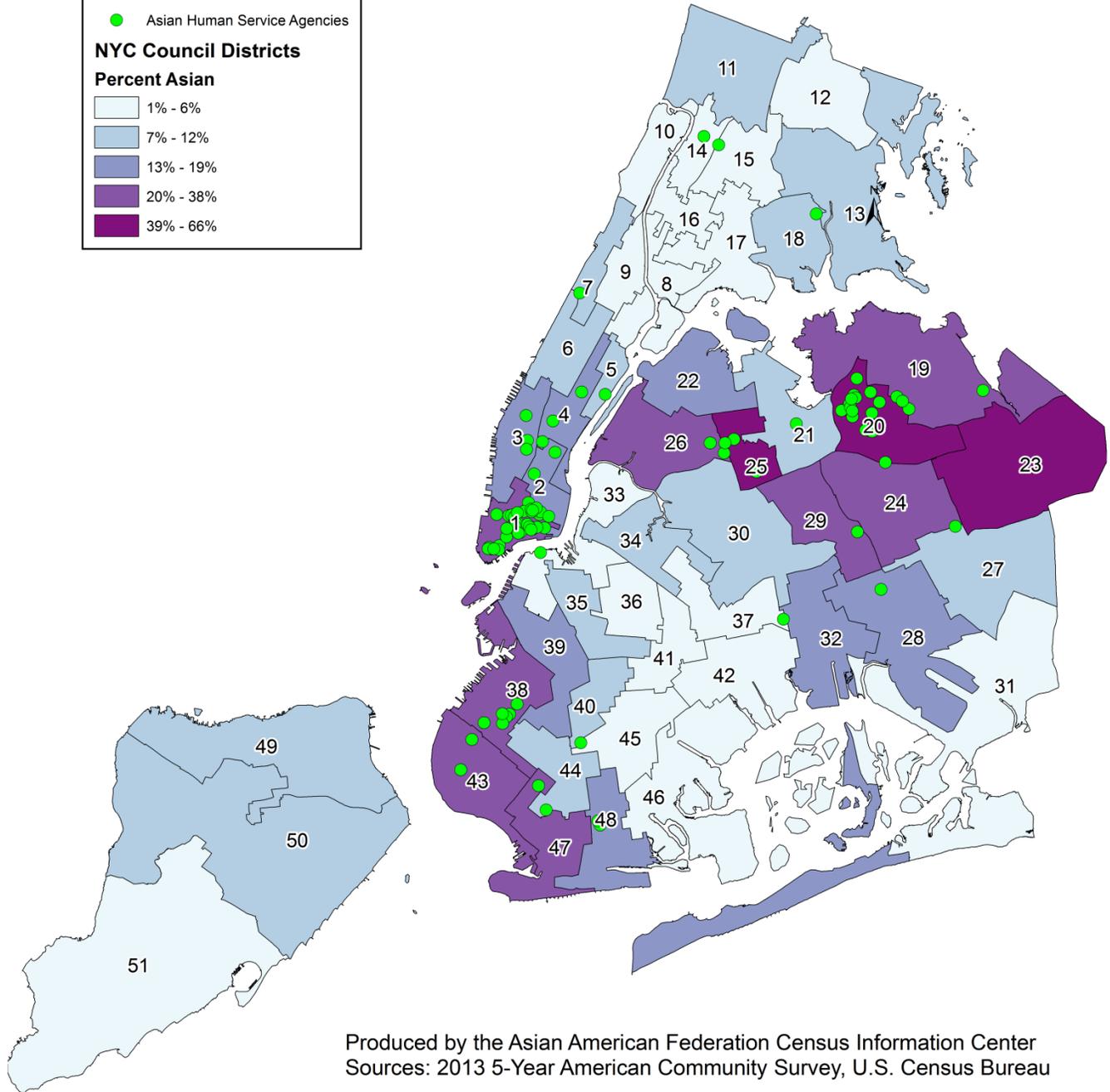
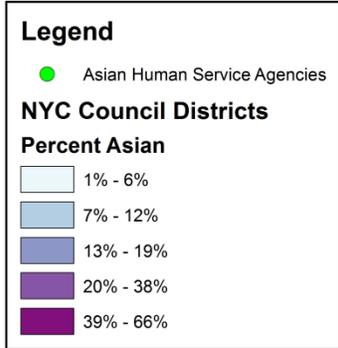
Other Asian — For New York City this ethnic category primarily includes Burmese, Bhutanese, Cambodian, Indonesian, Malaysian, Nepalese, Sri Lankan, and Thai residents.

Other Asian Languages – Category includes Malayalam, Tamil and Telugu languages from South Asia.

Other Indic Languages – Category includes Bengali, Punjabi and Nepali languages from South Asia.

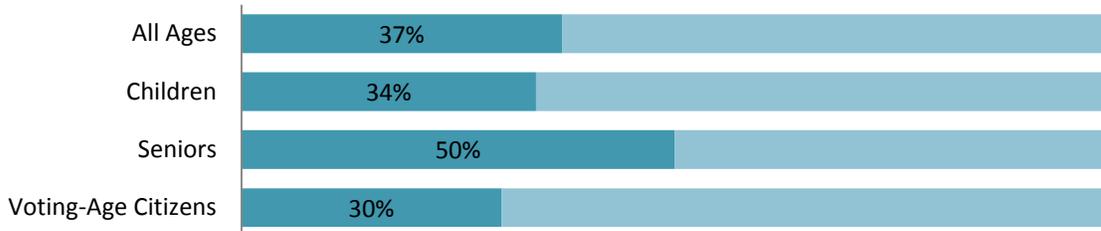


Percent of Asian New Yorkers by District

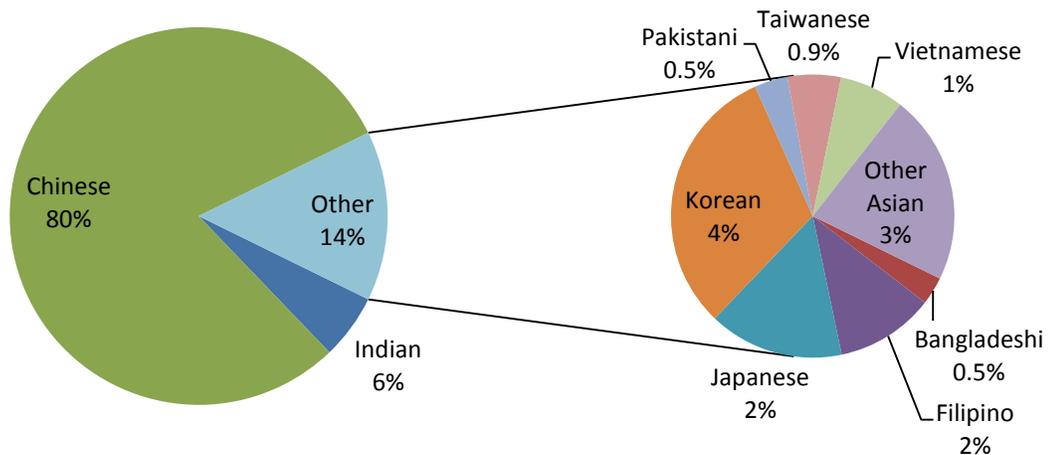


City Council District 1

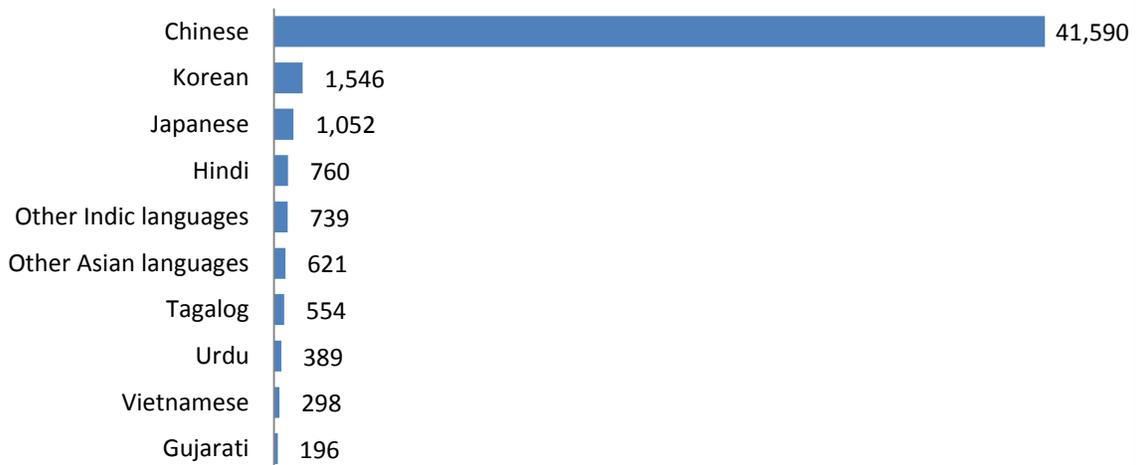
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

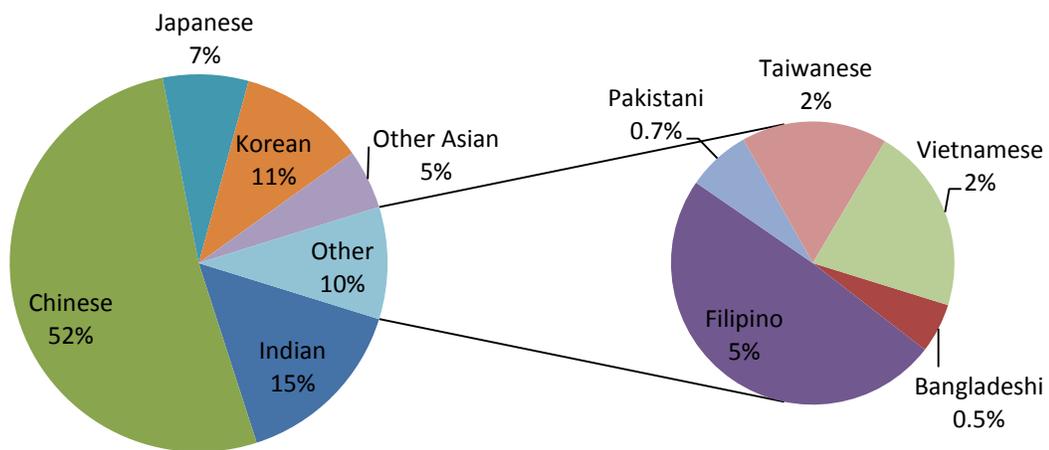


City Council District 2

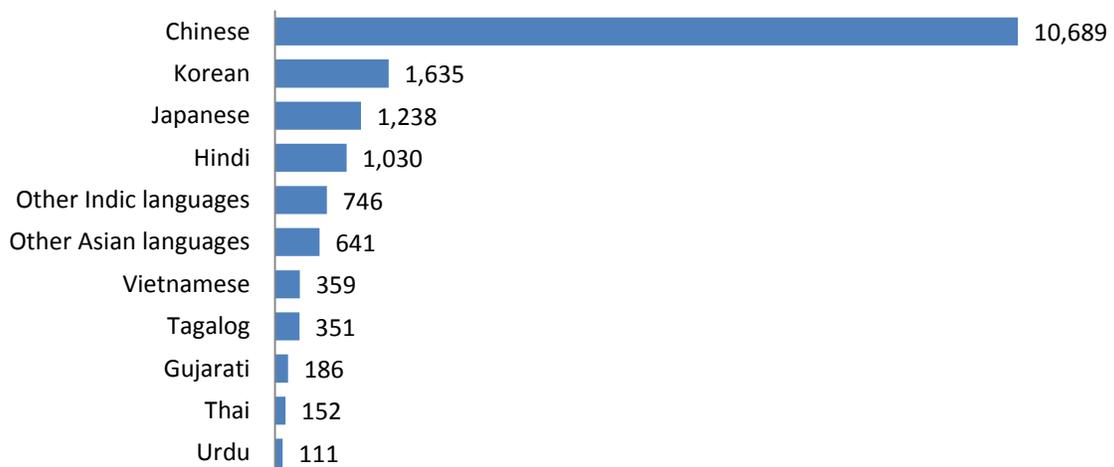
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

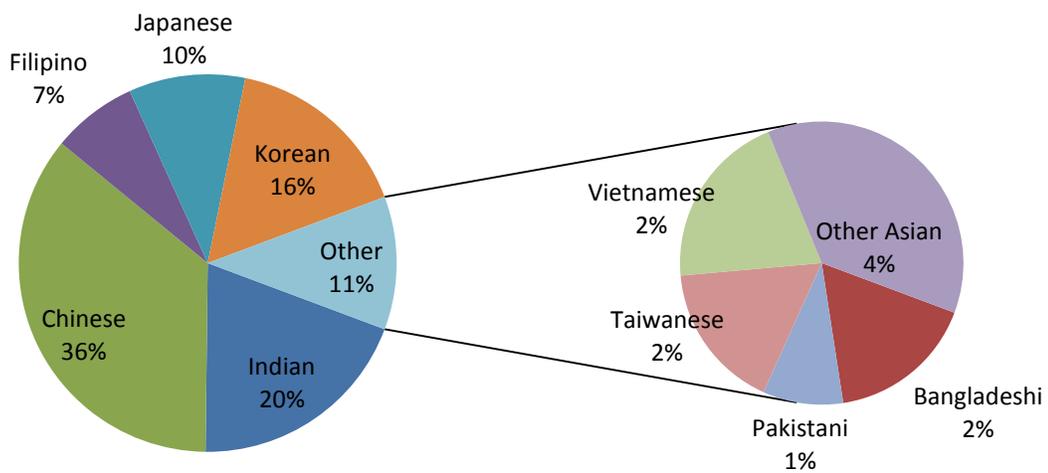


City Council District 3

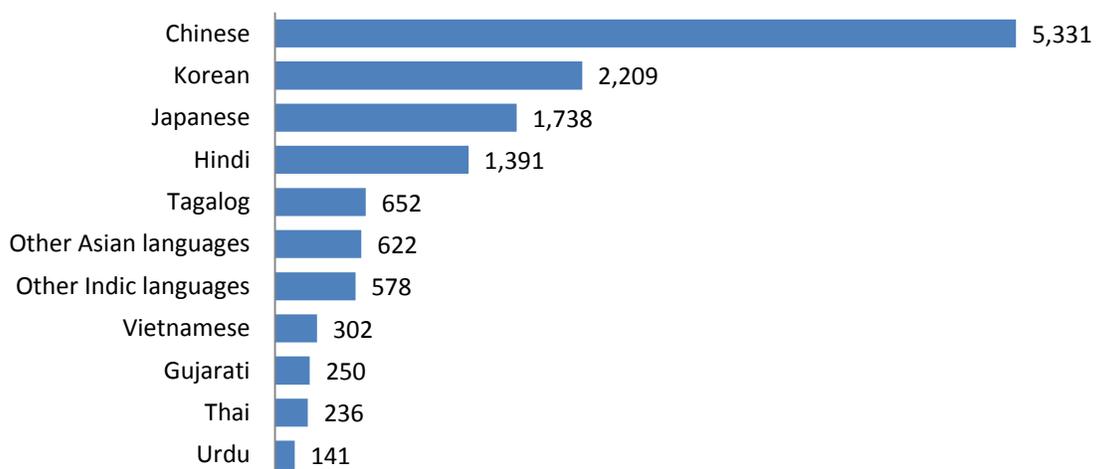
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

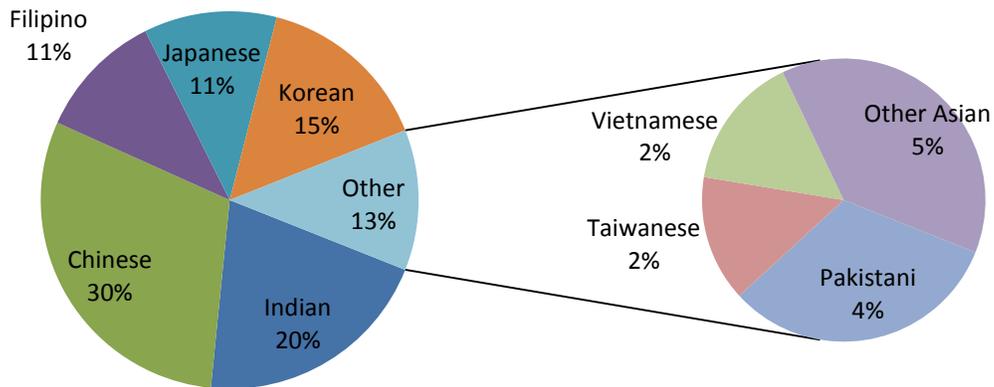


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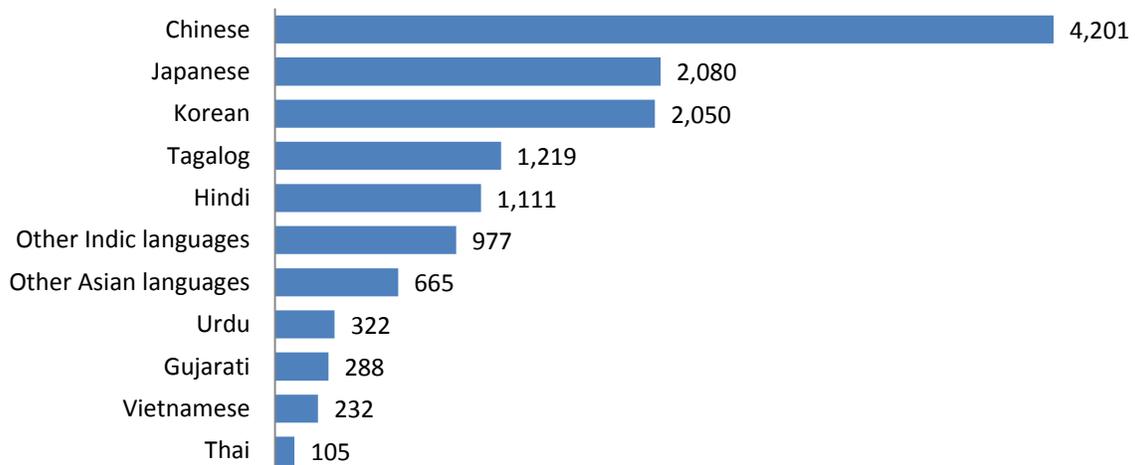
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

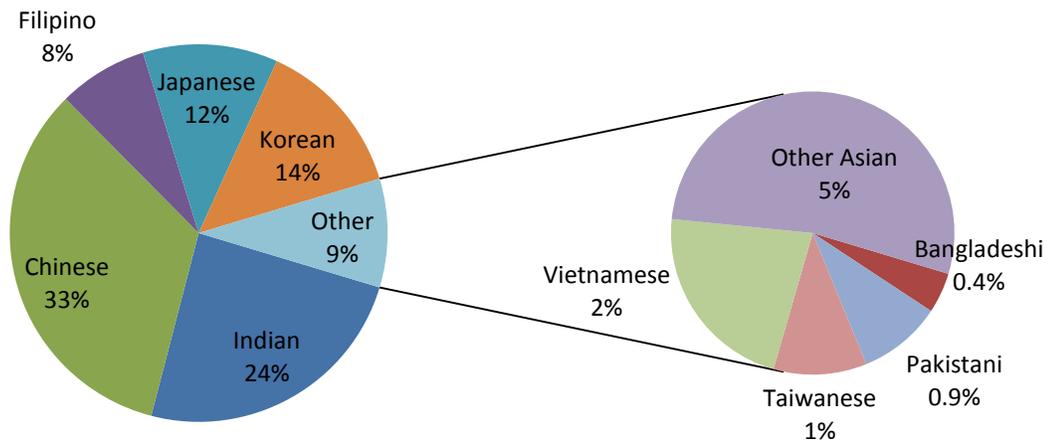


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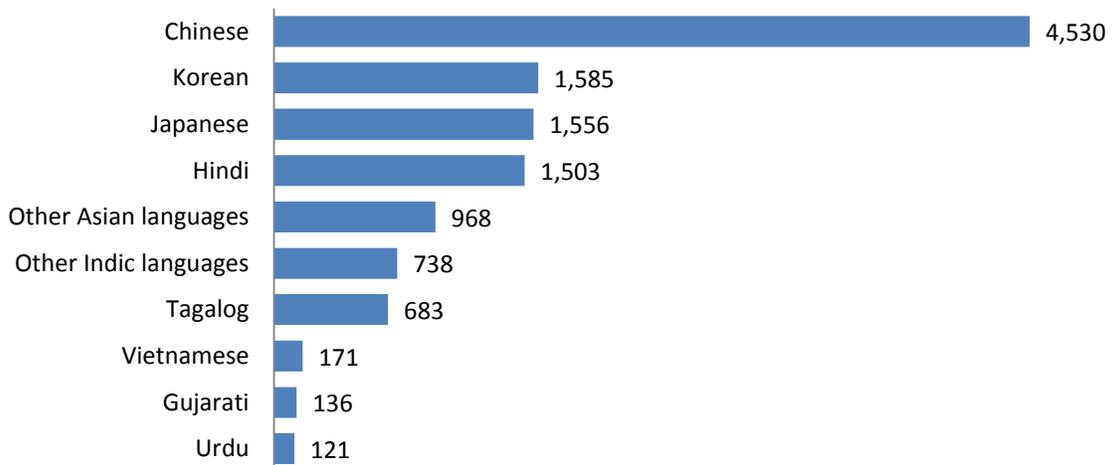
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

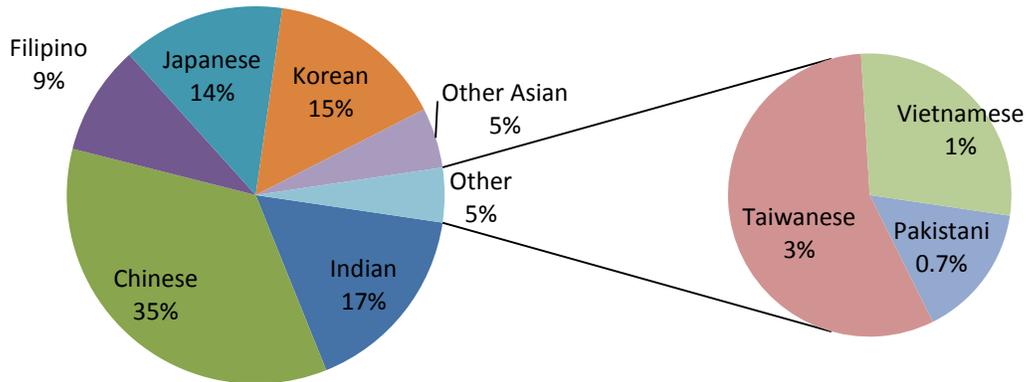


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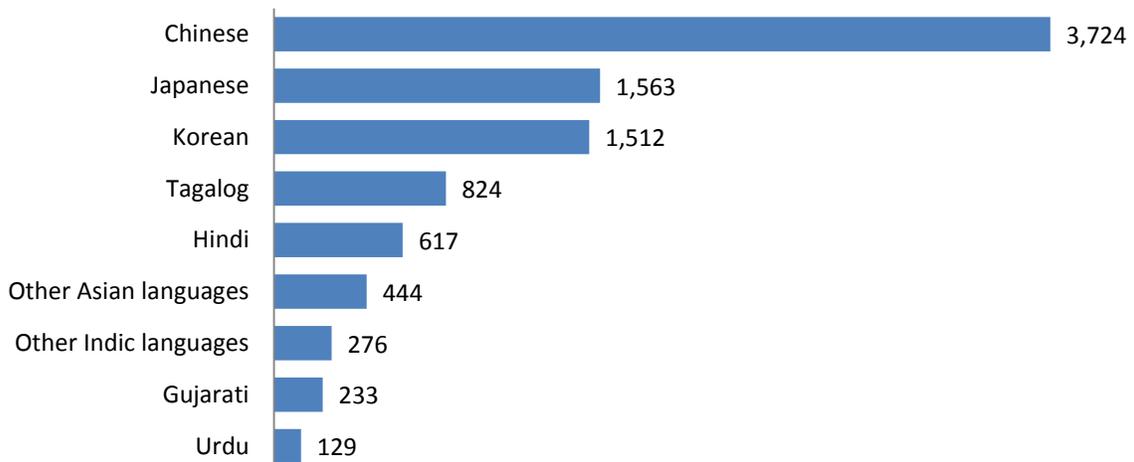
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

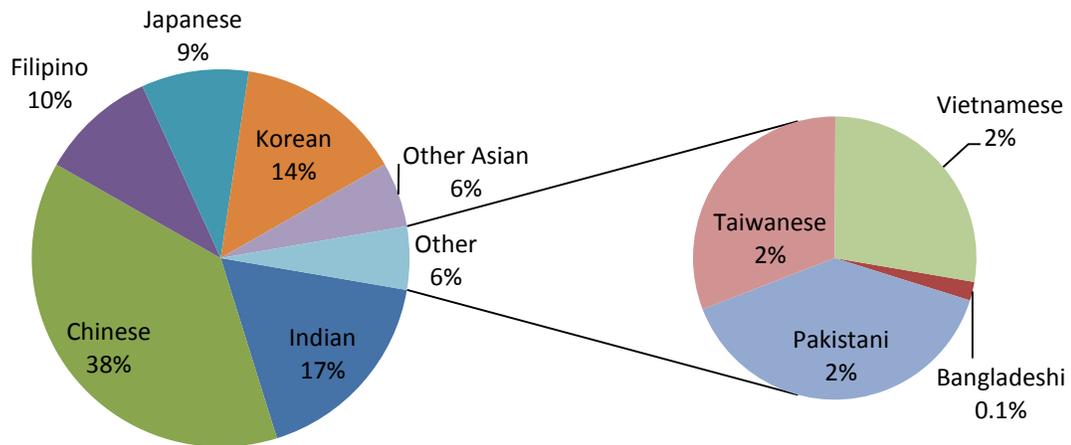


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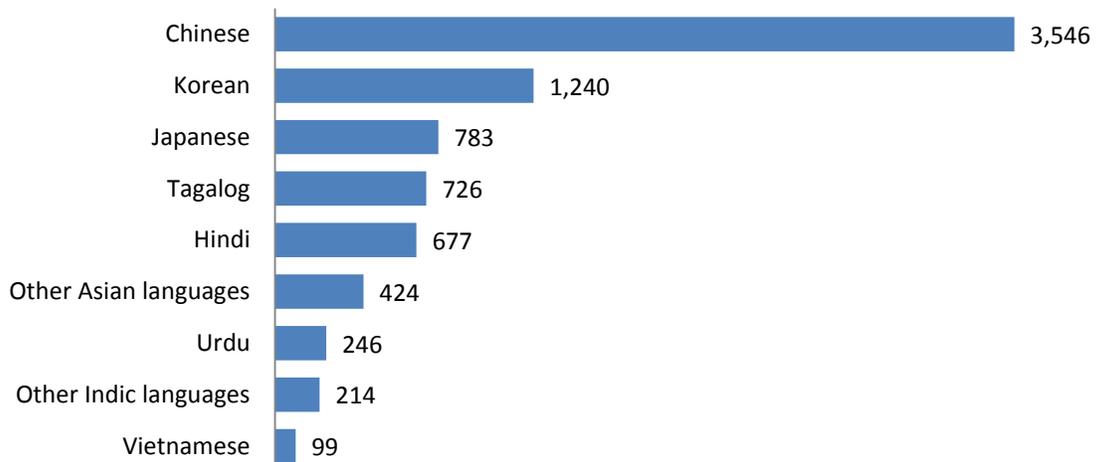
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

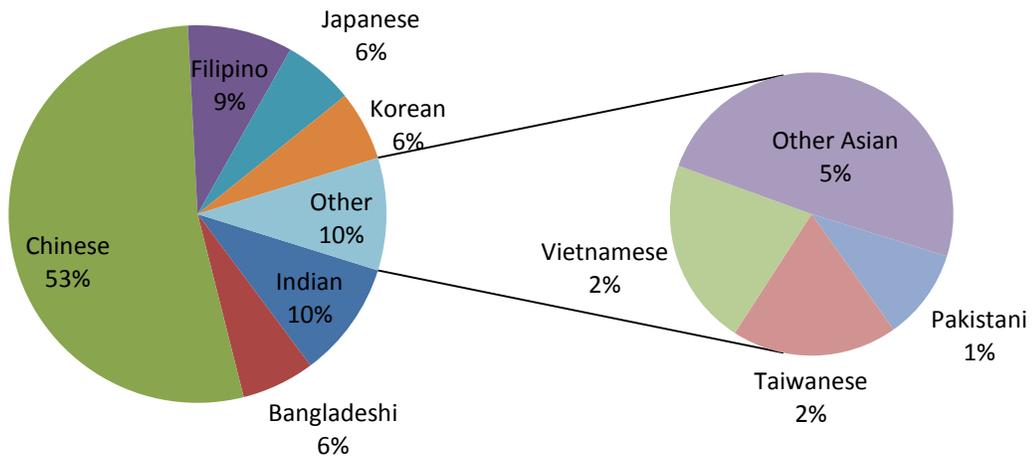


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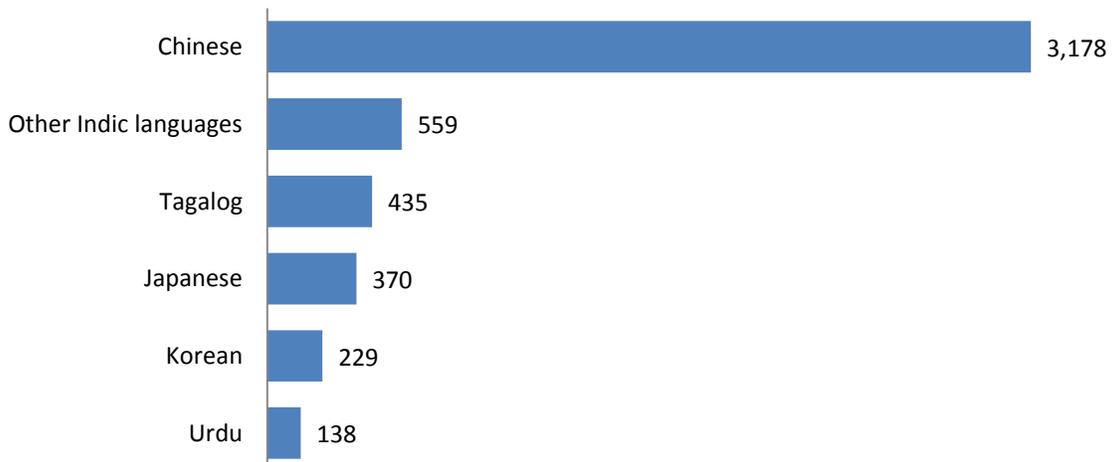
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

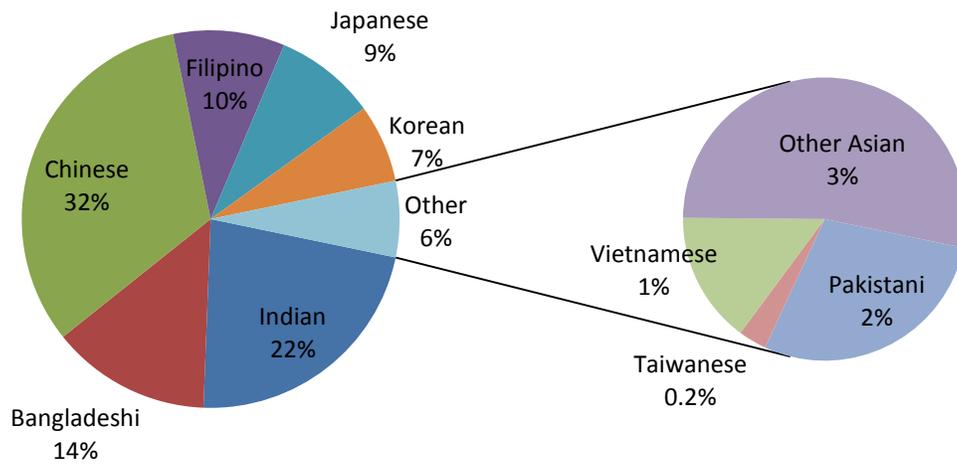


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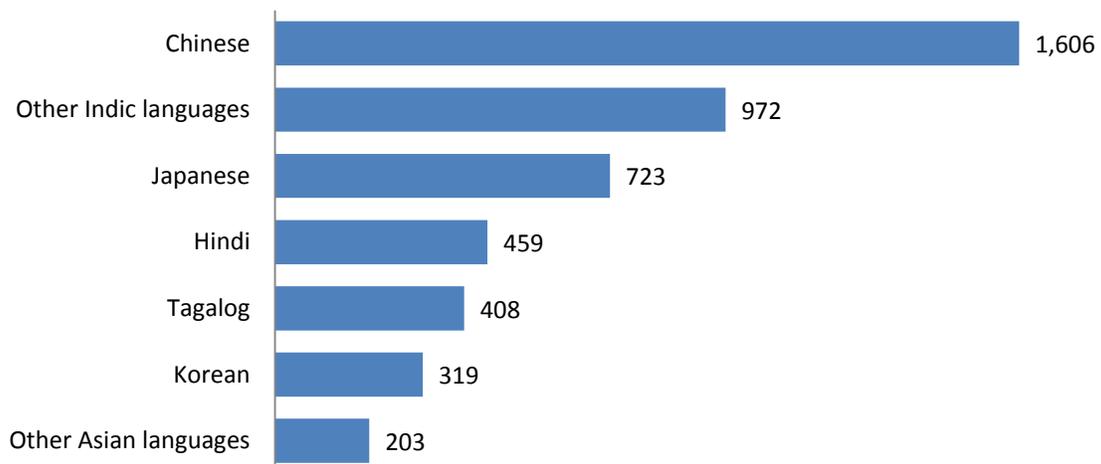
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

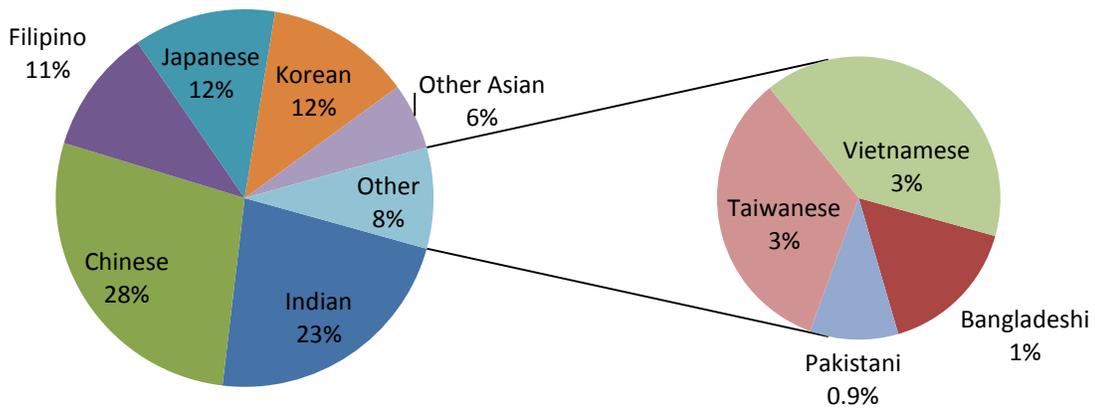


City Council District 10

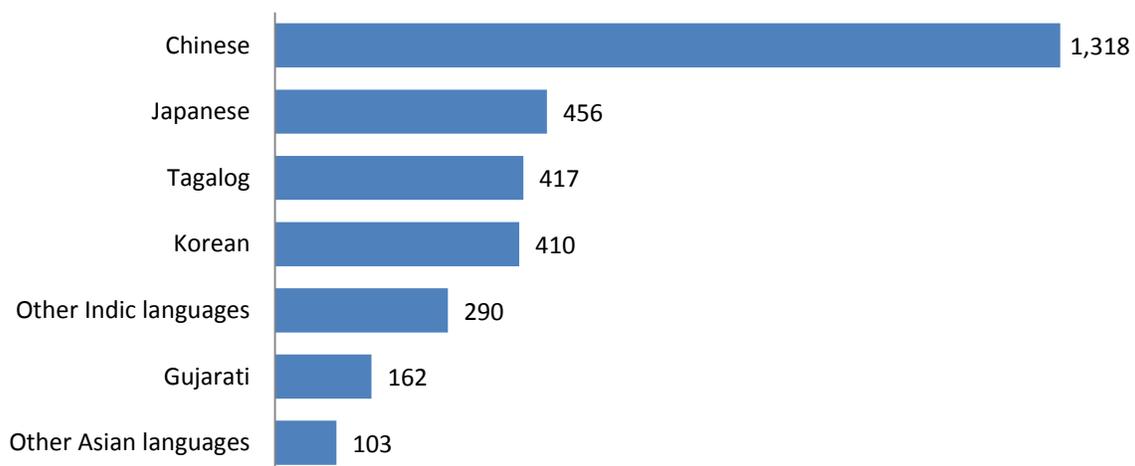
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

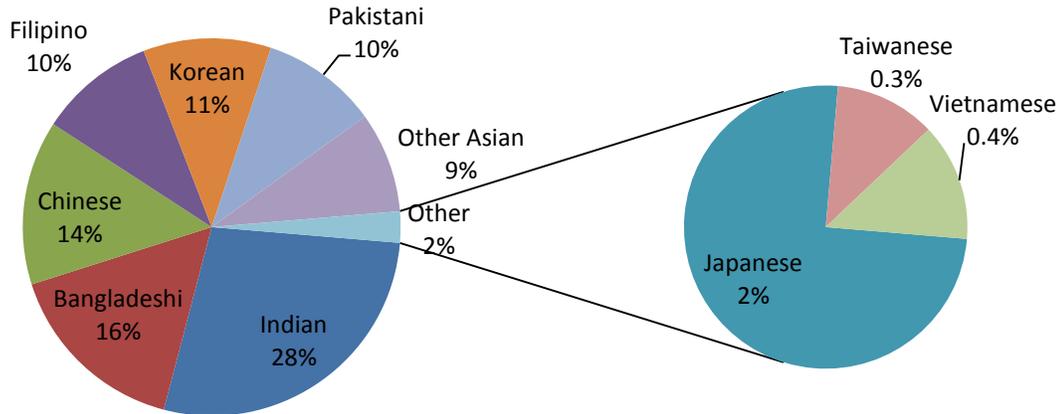


City Council District 11

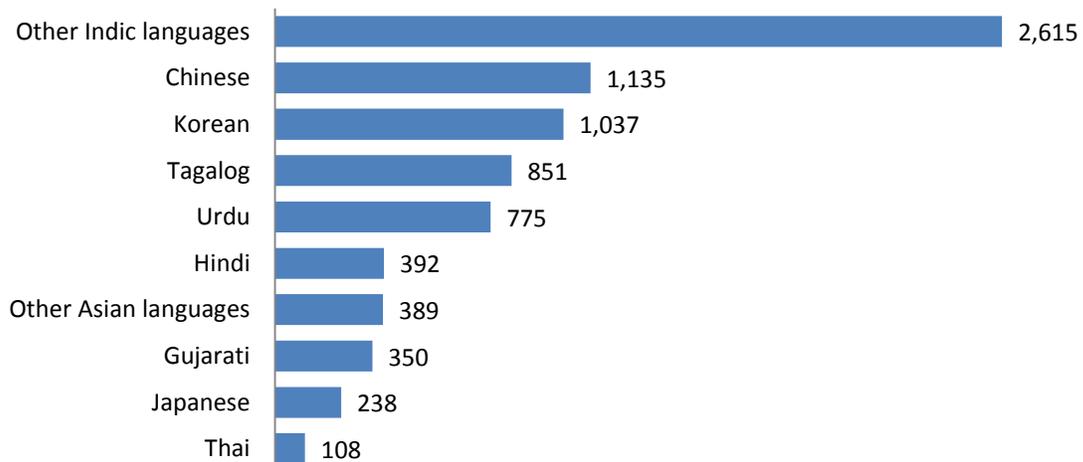
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

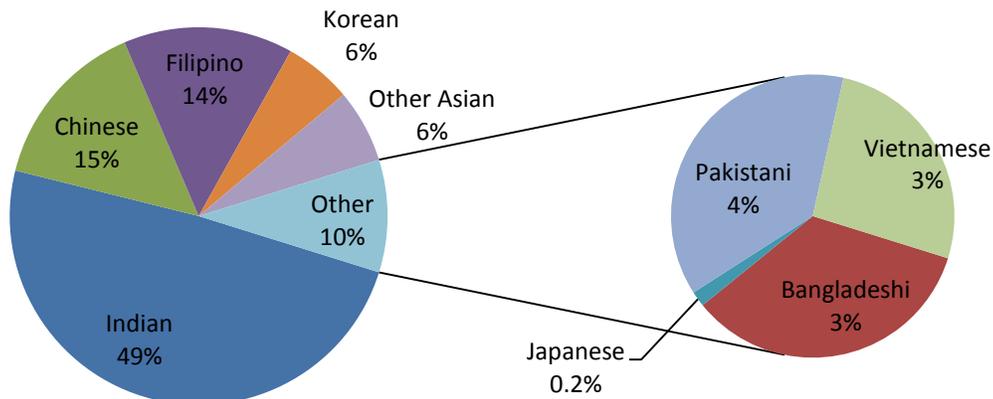


City Council District 12

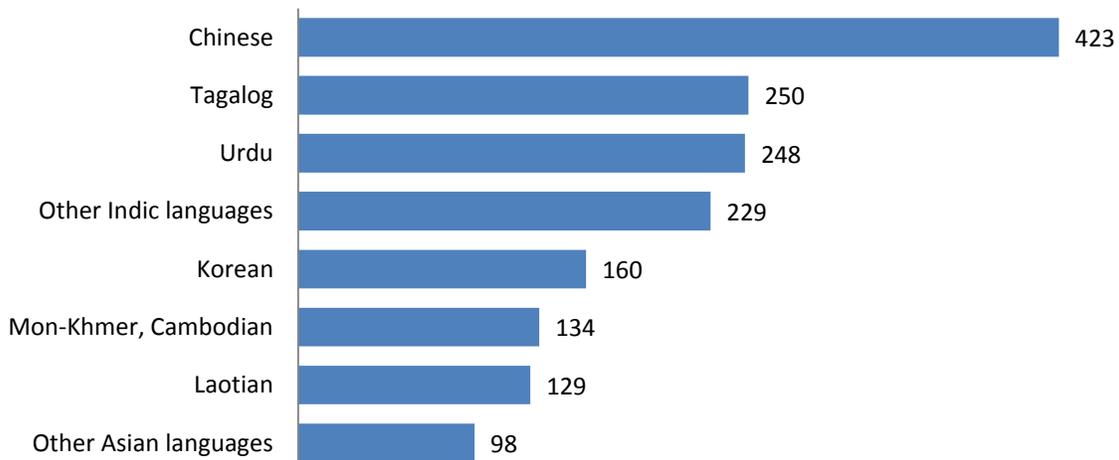
Asians as a Percent of District



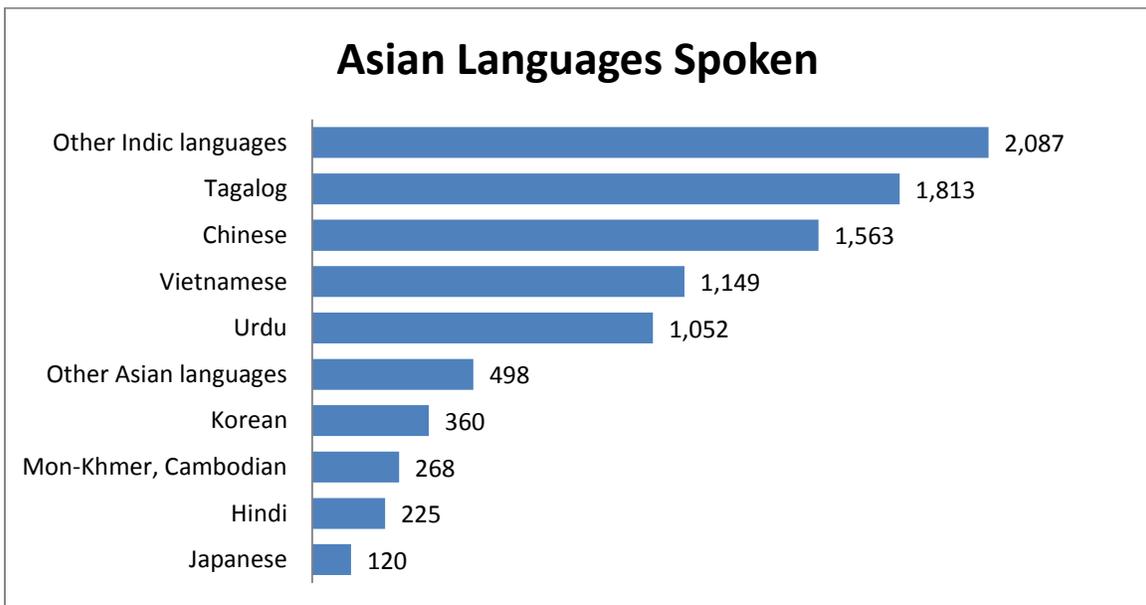
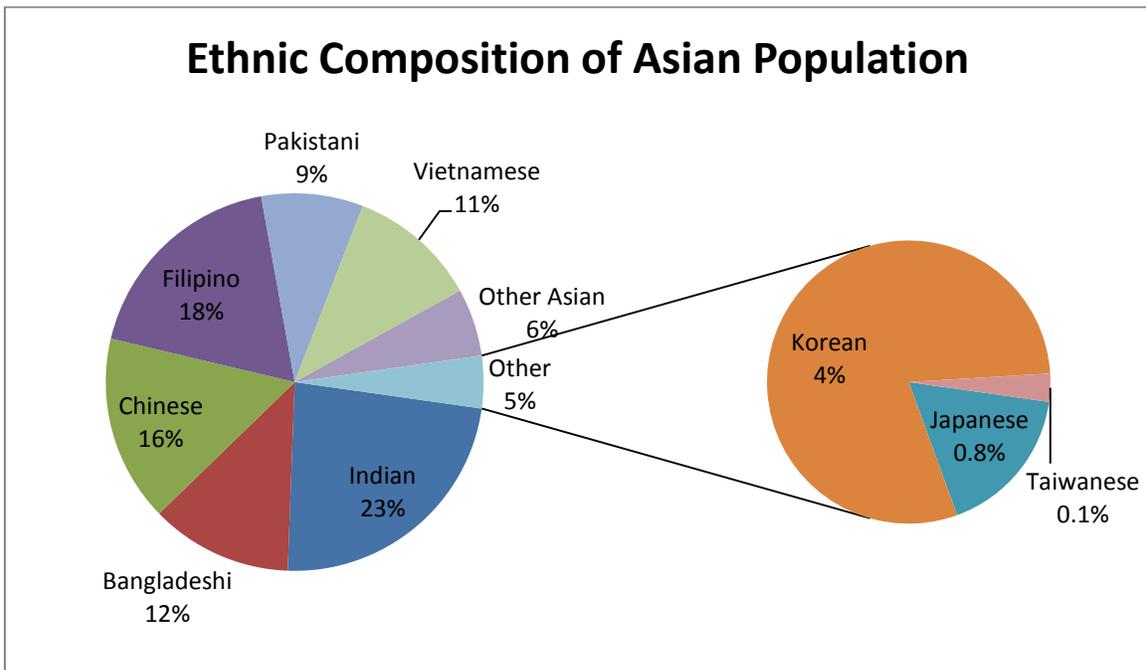
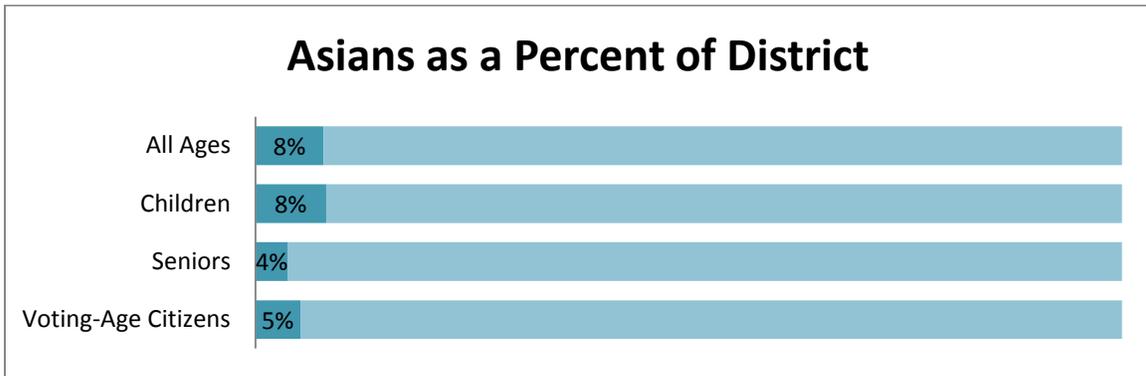
Ethnic Composition of Asian Population



Asian Languages Spoken



City Council District 13

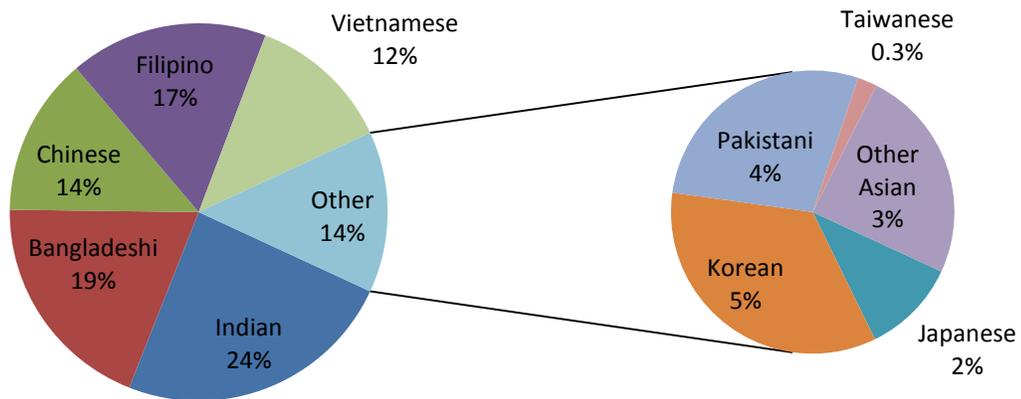


City Council District 14

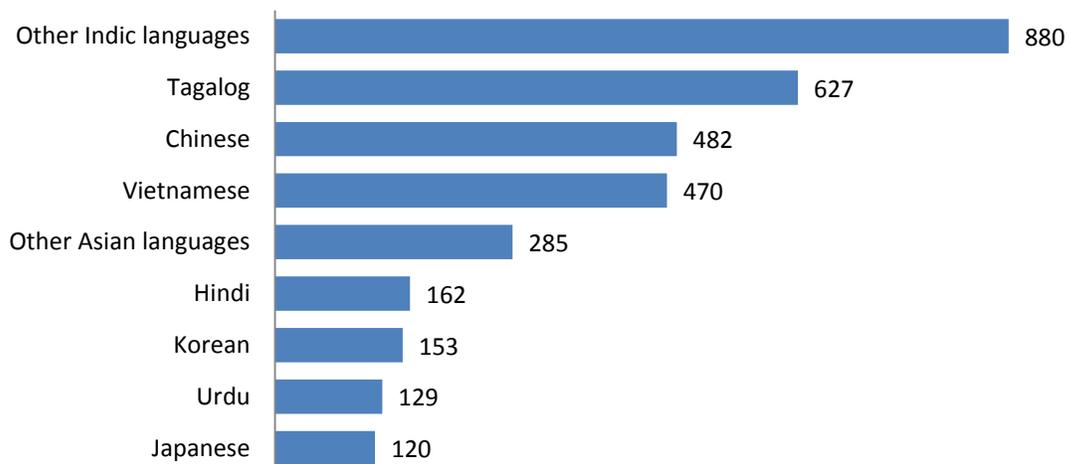
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

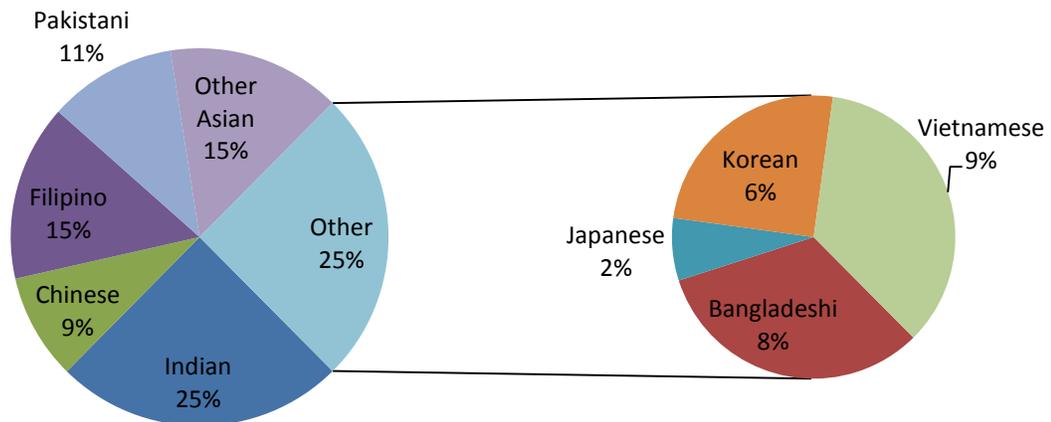


City Council District 15

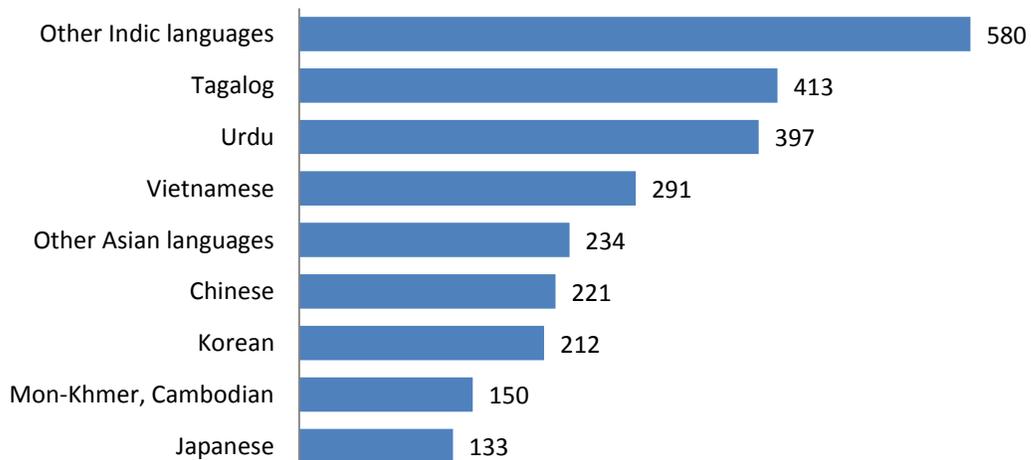
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

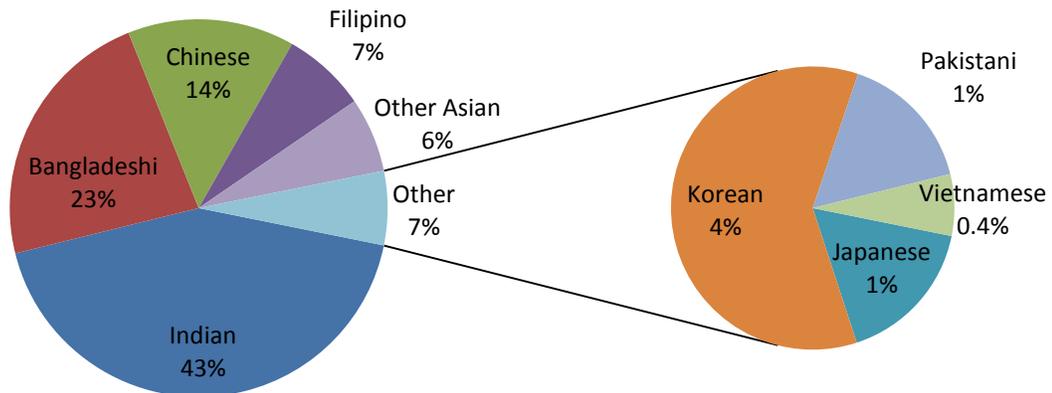


City Council District 16

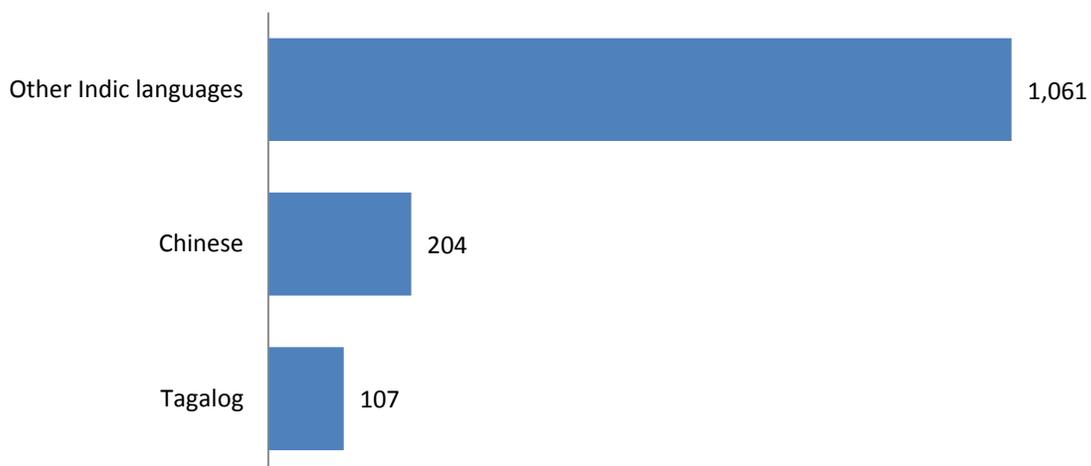
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

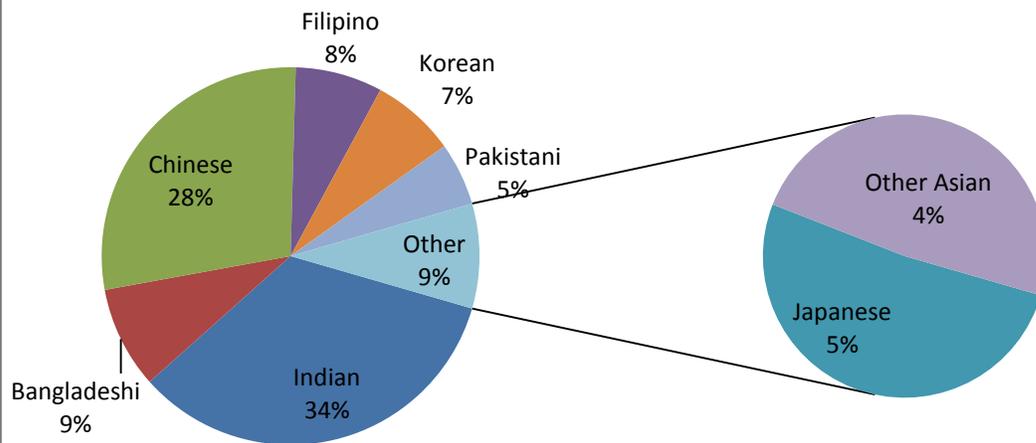


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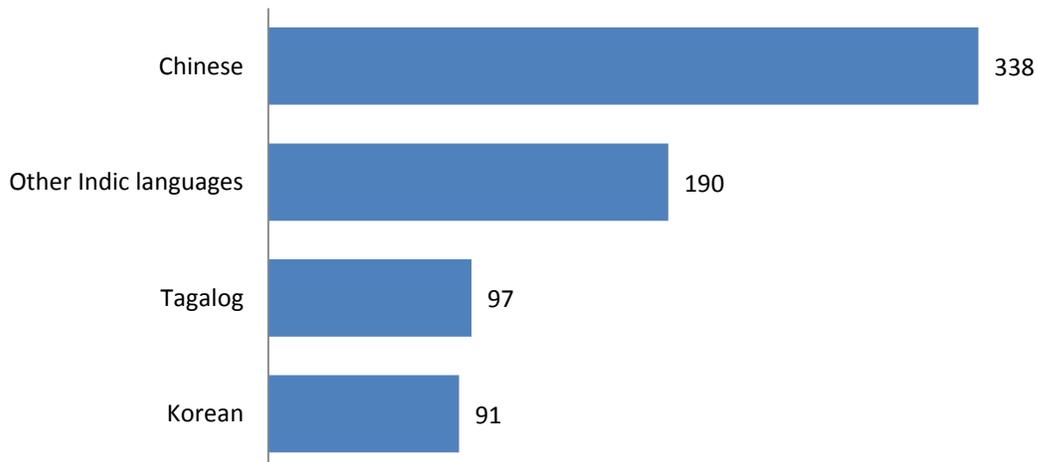
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

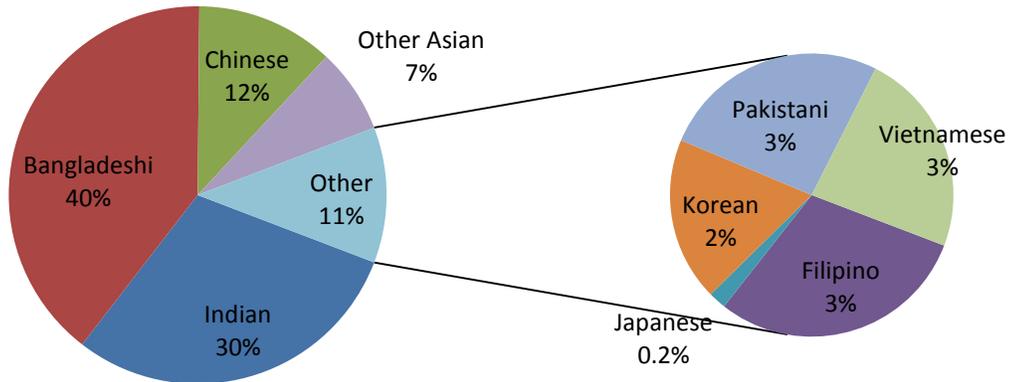


City Council District 18

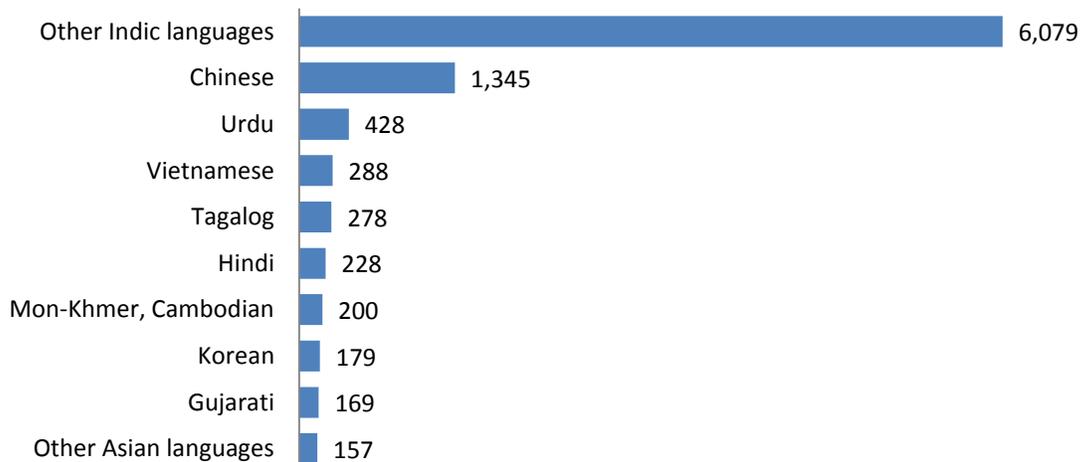
Asians as a Percent of District



Ethnic Composition of Asian Population

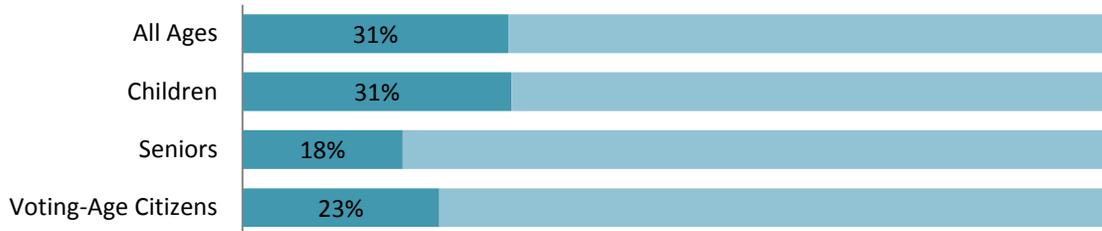


Asian Languages Spoken

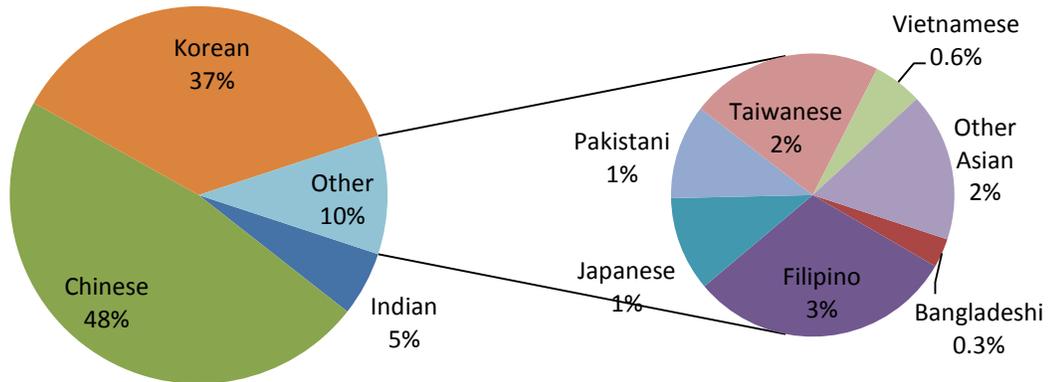


City Council District 19

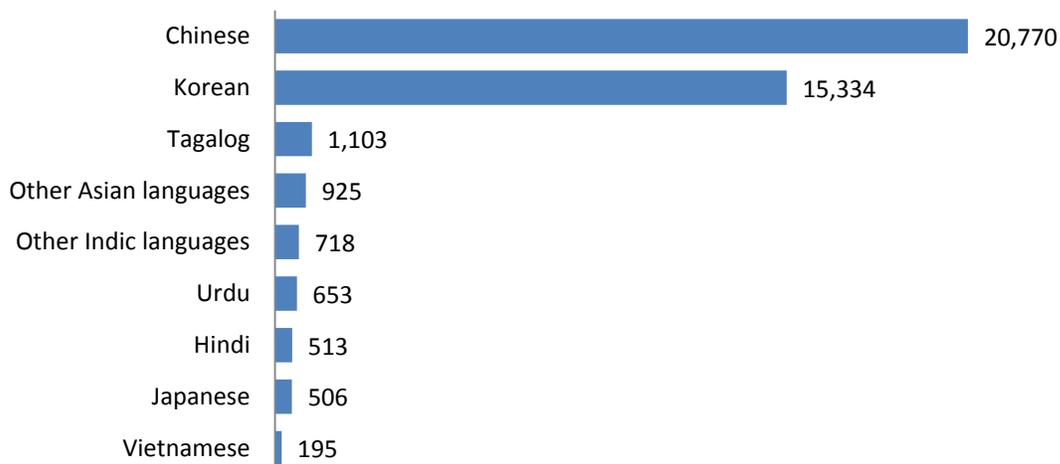
Asians as a Percent of District



Ethnic Composition of Asian Population

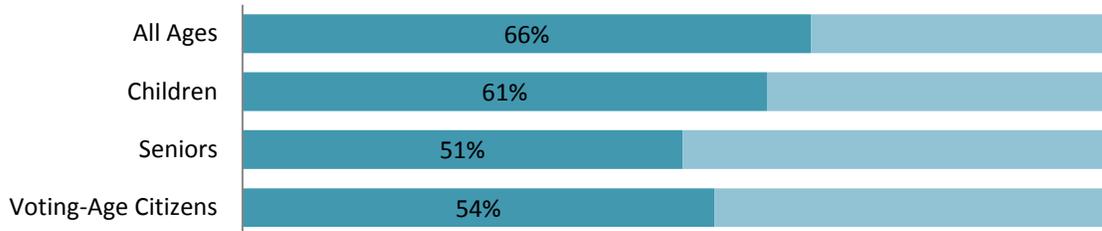


Asian Languages Spoken

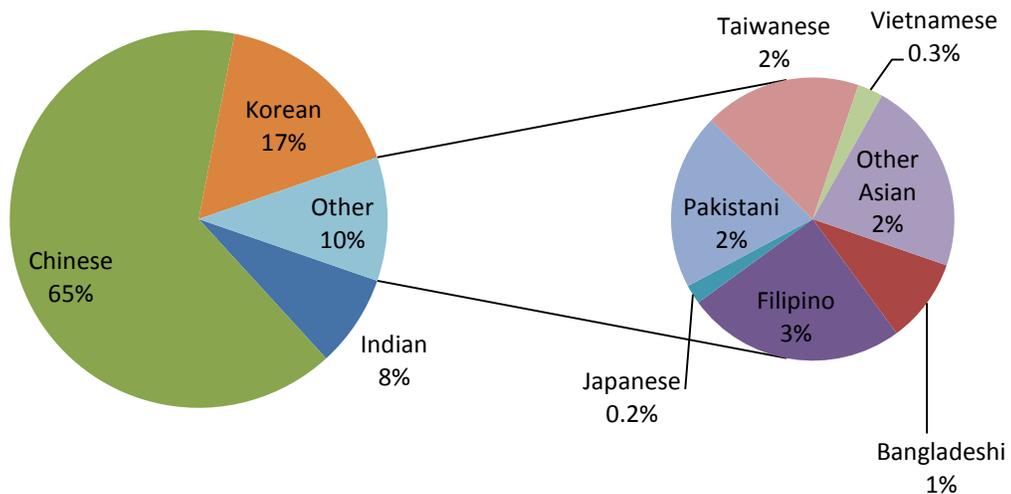


City Council District 20

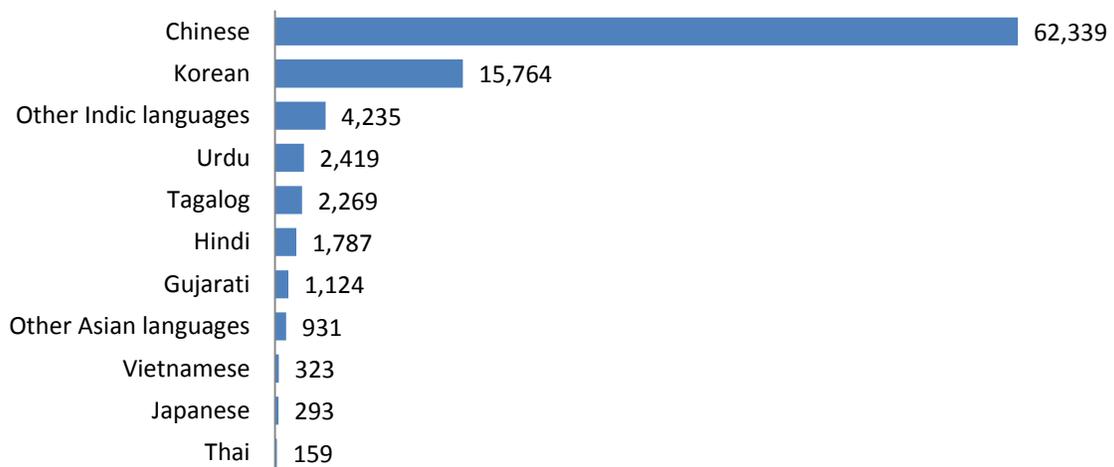
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

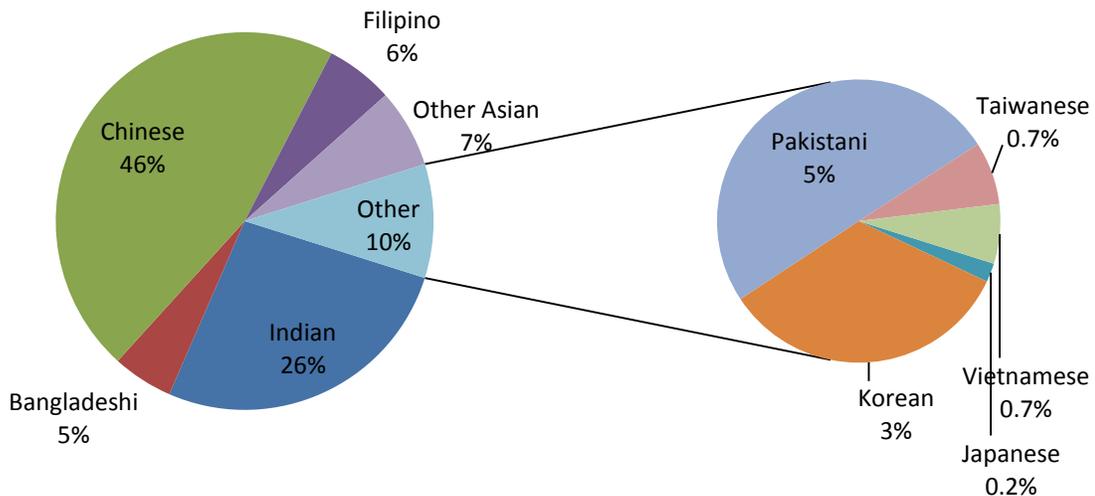


City Council District 21

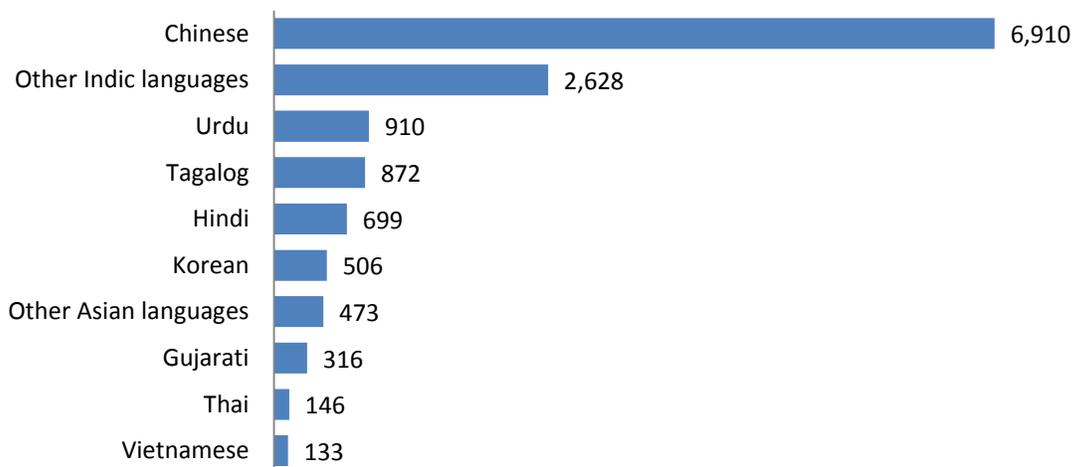
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

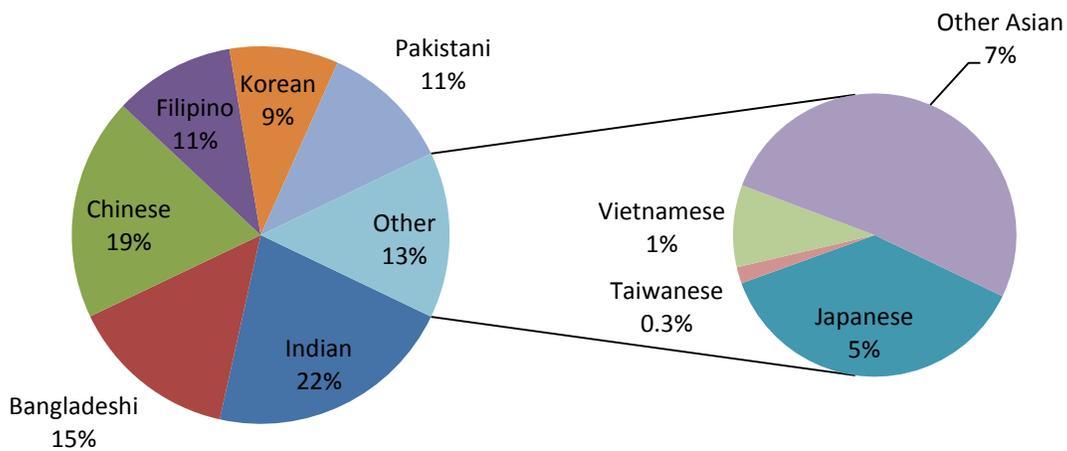


City Council District 22

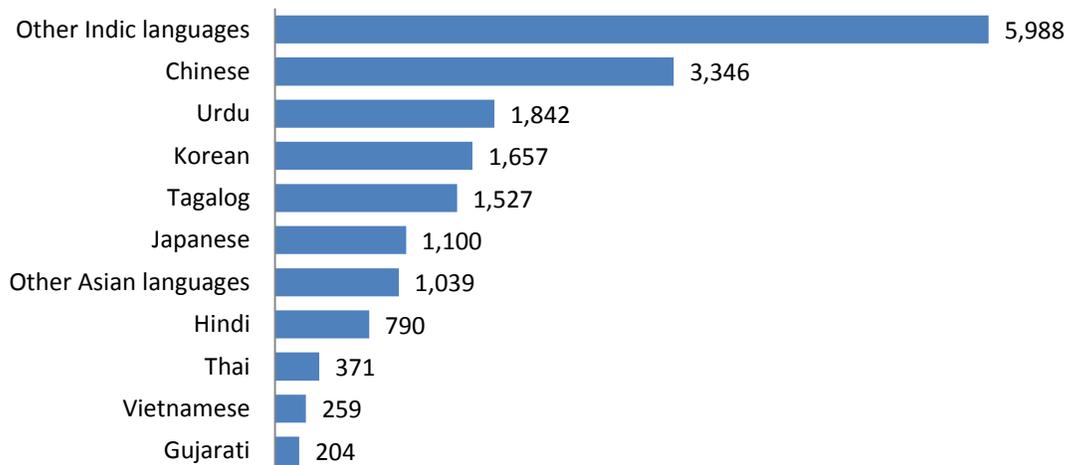
Asians as a Percent of District



Ethnic Composition of Asian Population

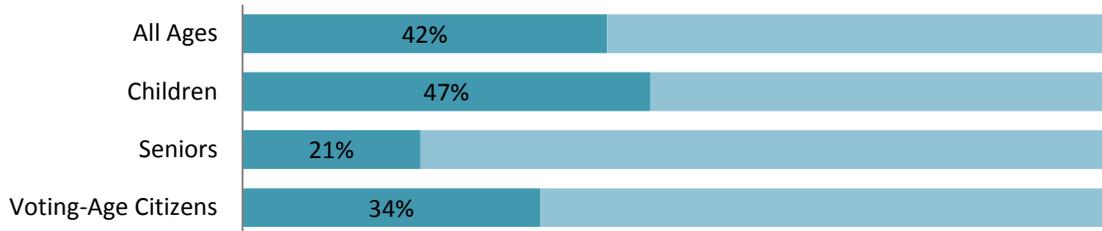


Asian Languages Spoken

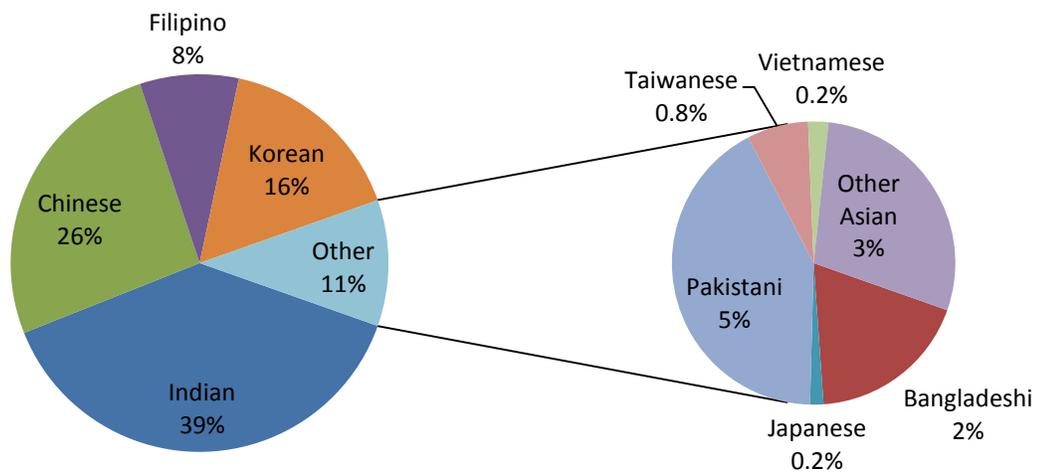


City Council District 23

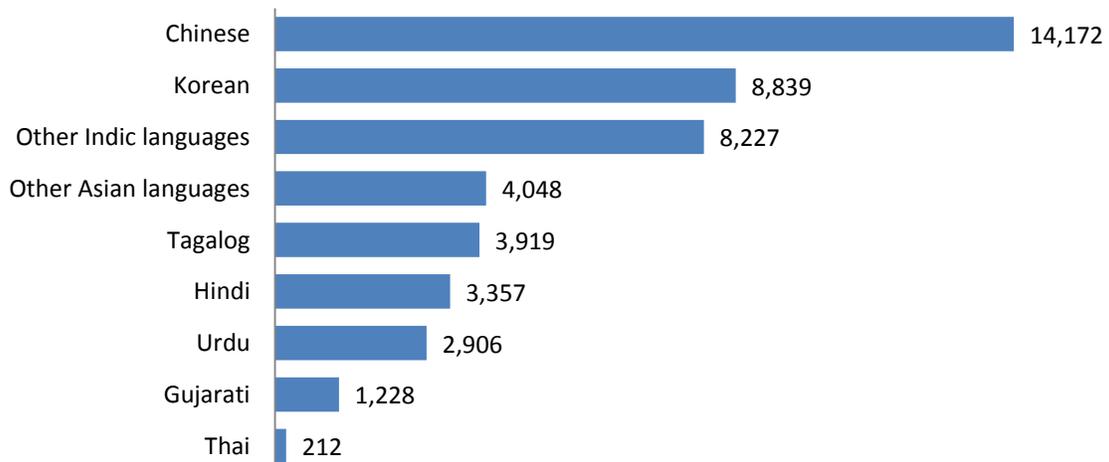
Asians as a Percent of District



Ethnic Composition of Asian Population

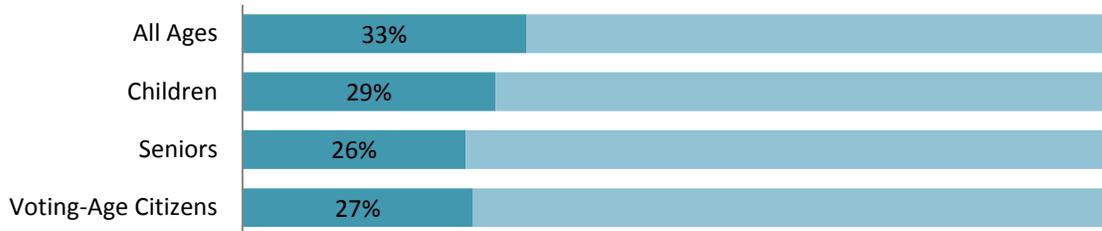


Asian Languages Spoken

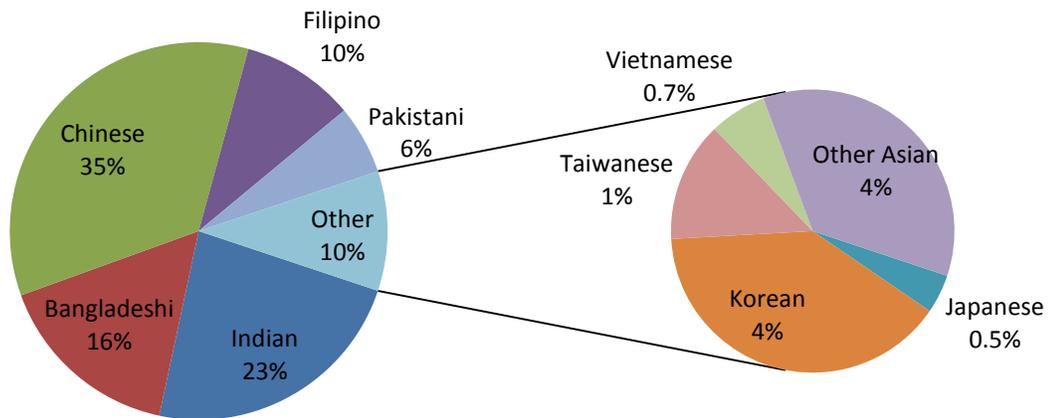


City Council District 24

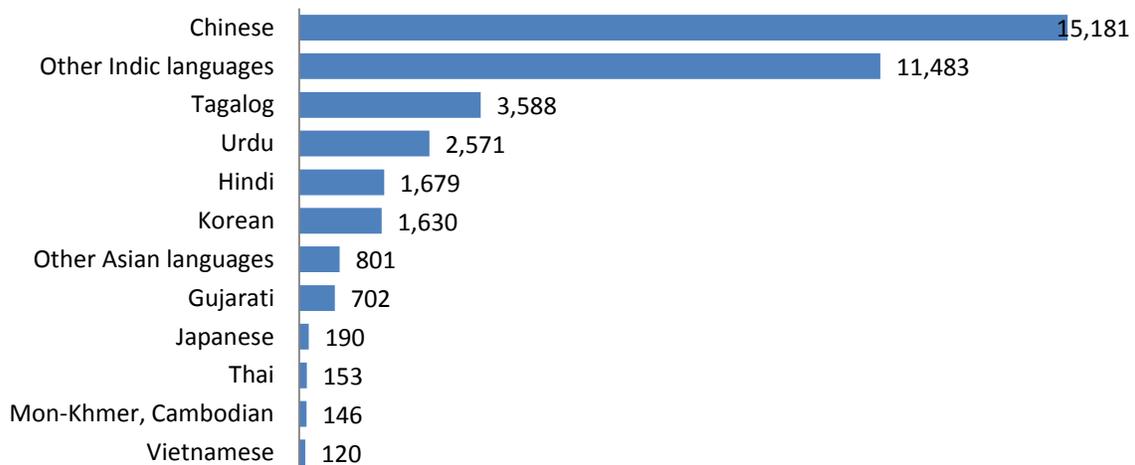
Asians as a Percent of District



Ethnic Composition of Asian Population

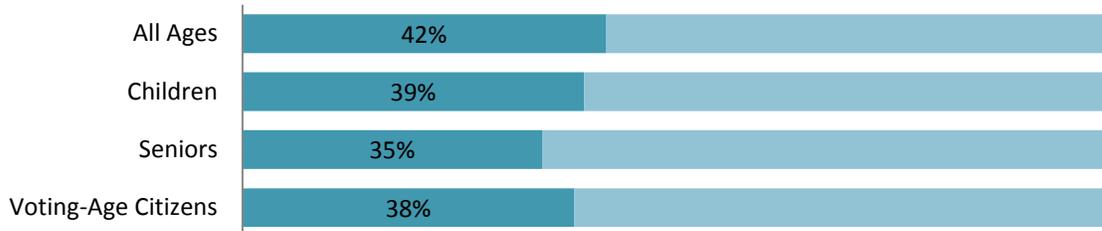


Asian Languages Spoken

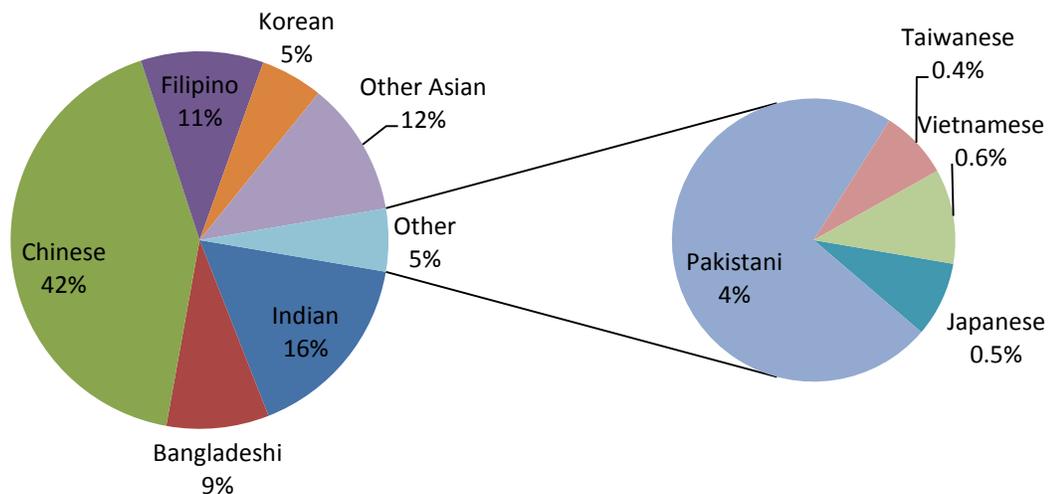


City Council District 25

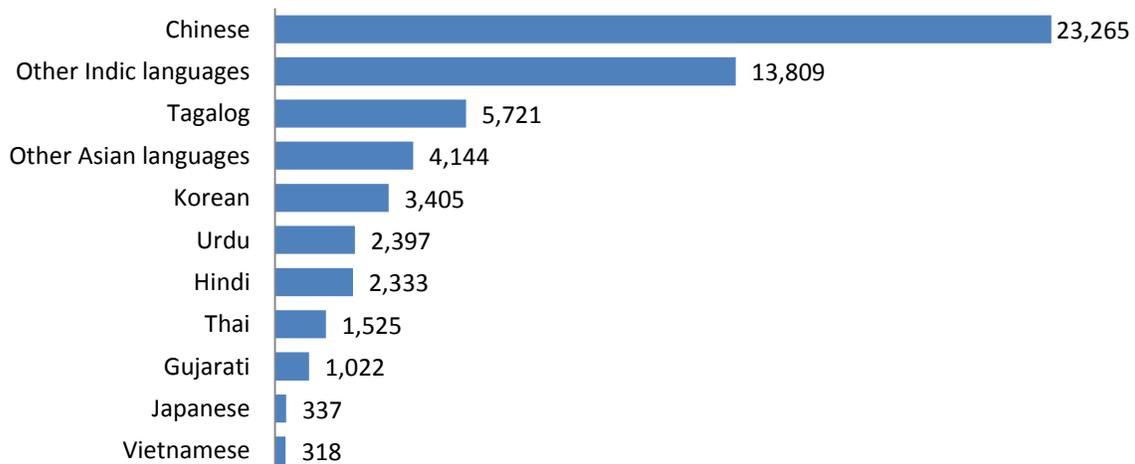
Asians as a Percent of District



Ethnic Composition of Asian Population

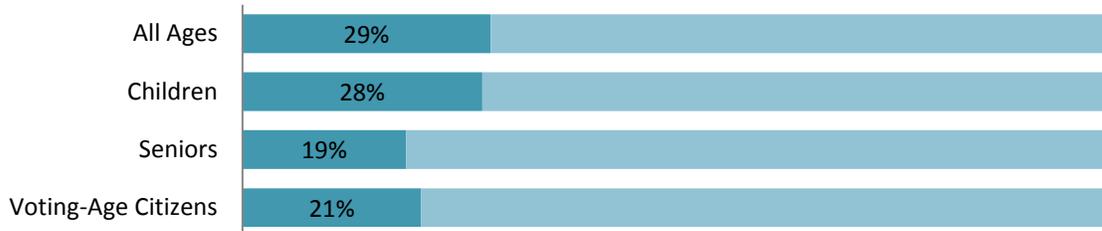


Asian Languages Spoken

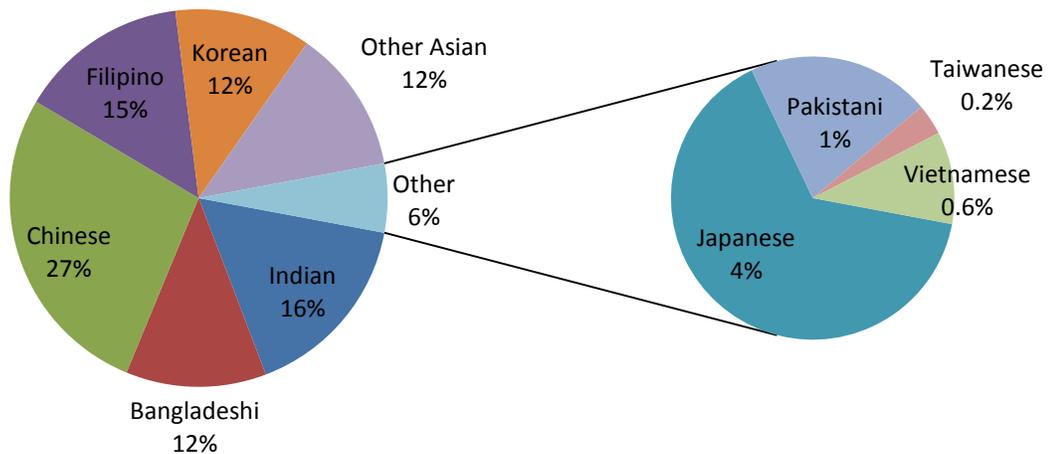


City Council District 26

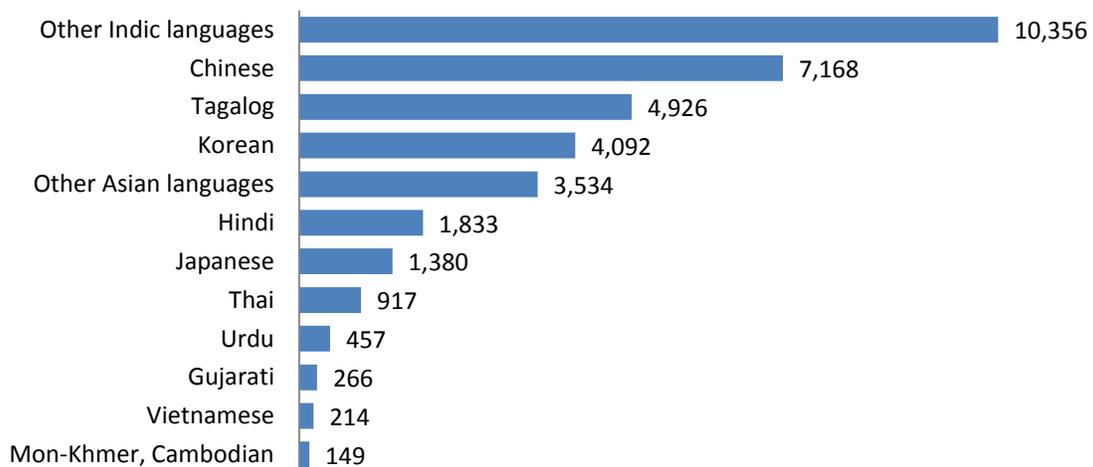
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

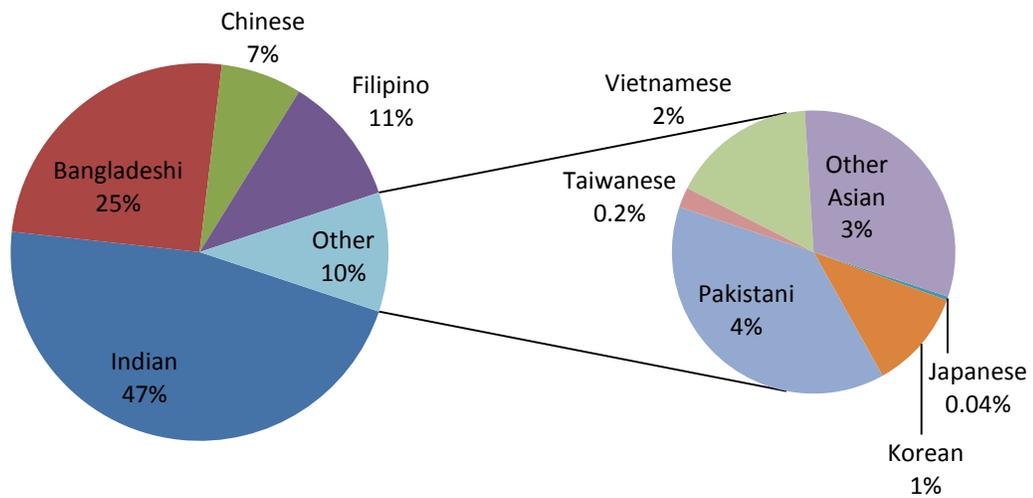


City Council District 27

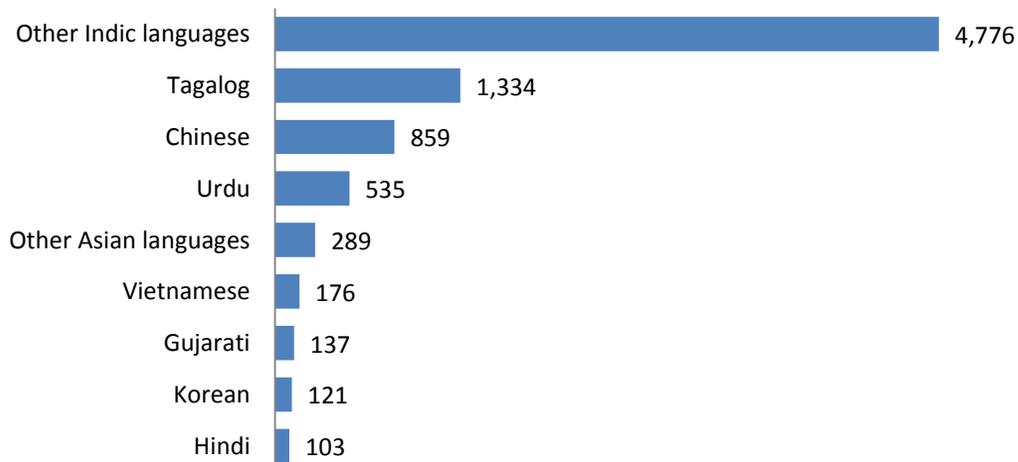
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

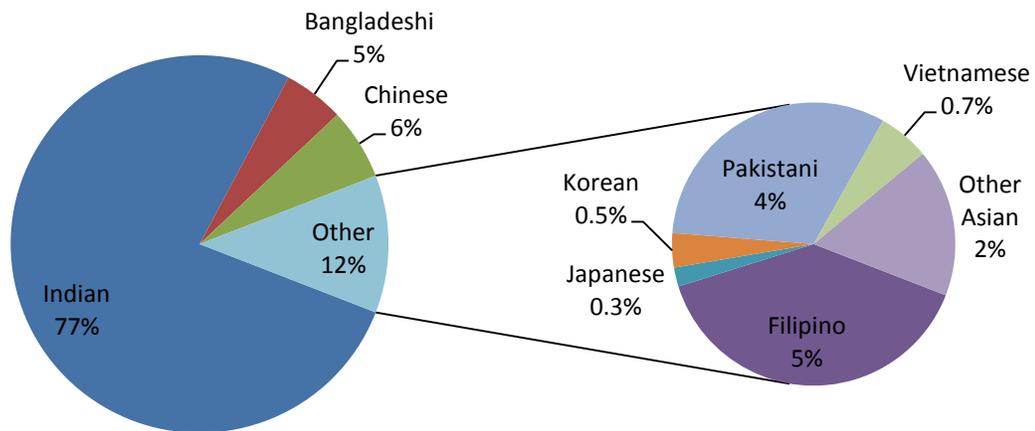


City Council District 28

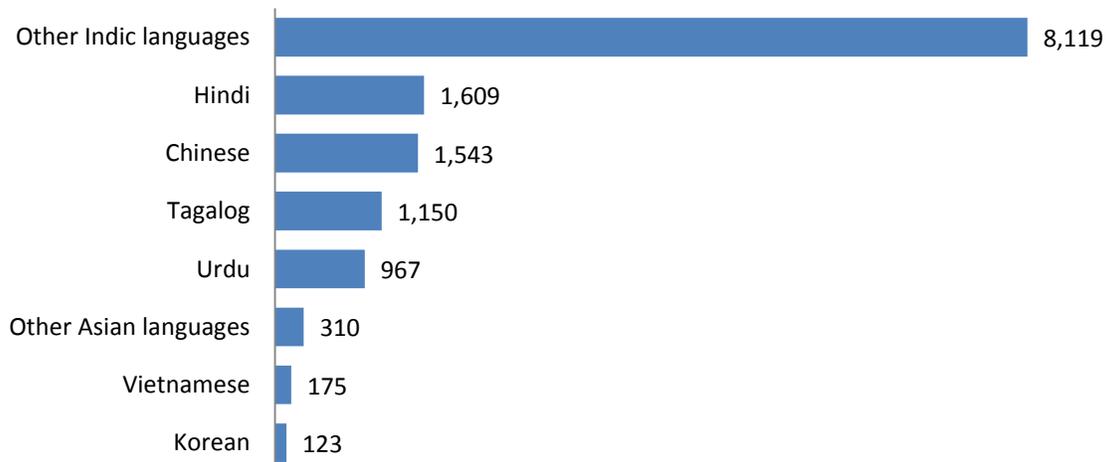
Asians as a Percent of District



Ethnic Composition of Asian Population

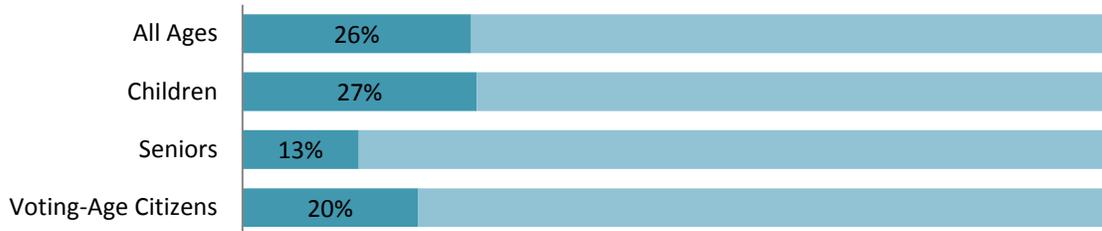


Asian Languages Spoken

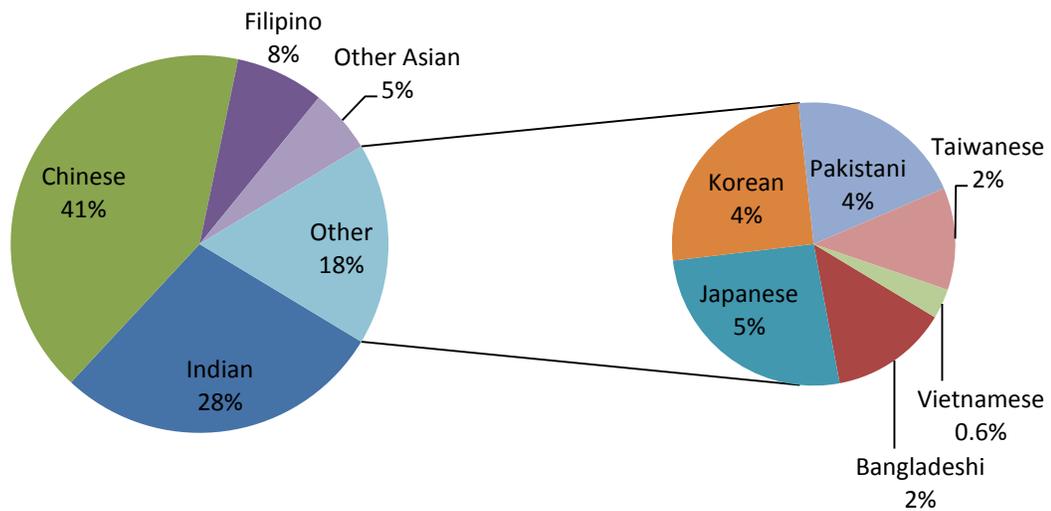


City Council District 29

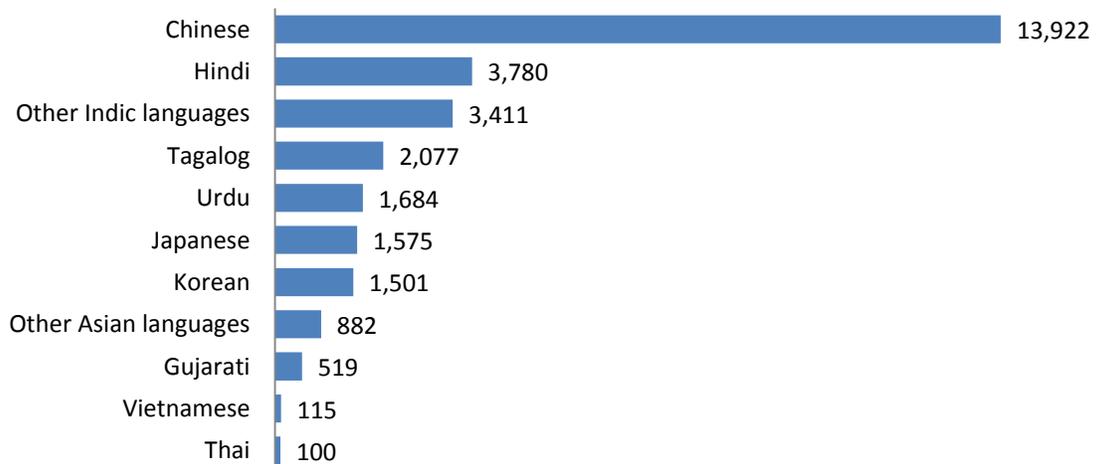
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

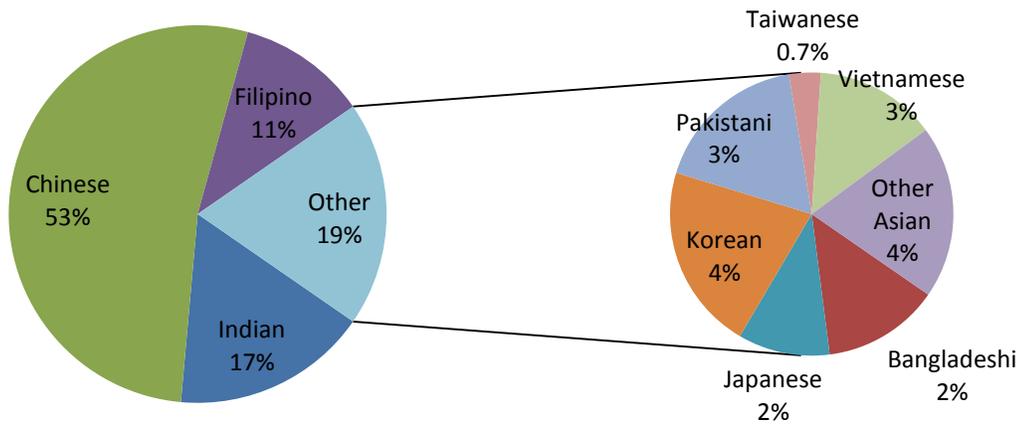


City Council District 30

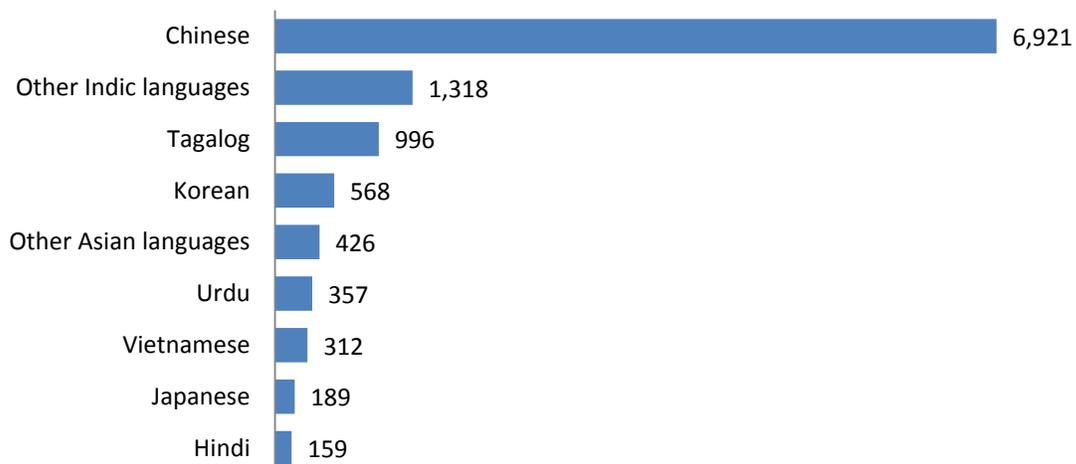
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

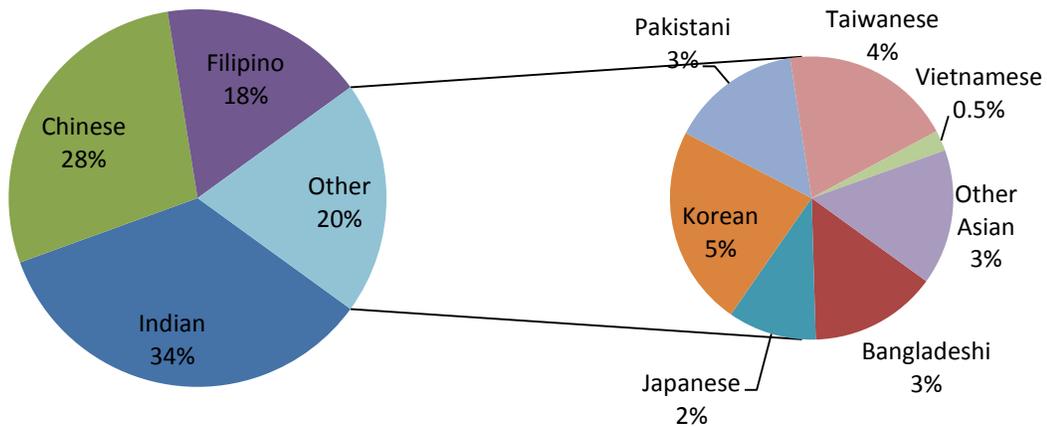


City Council District 31

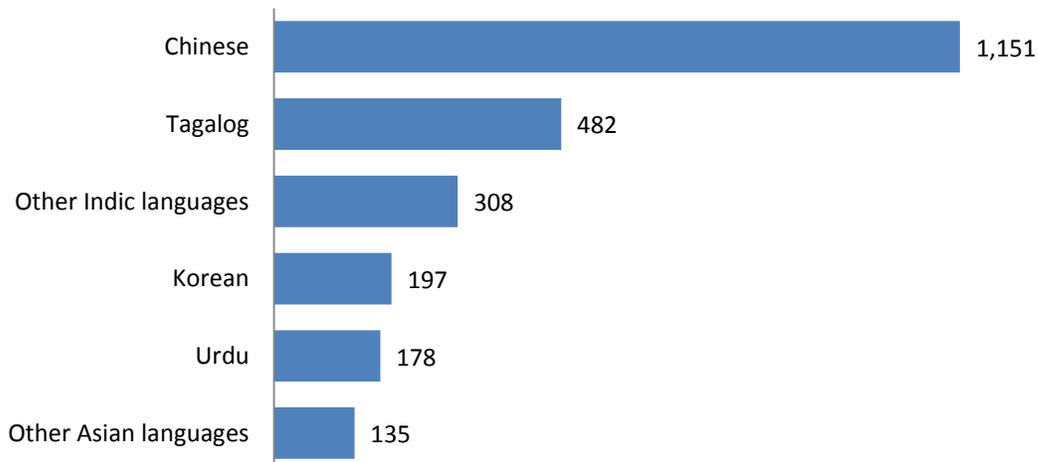
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

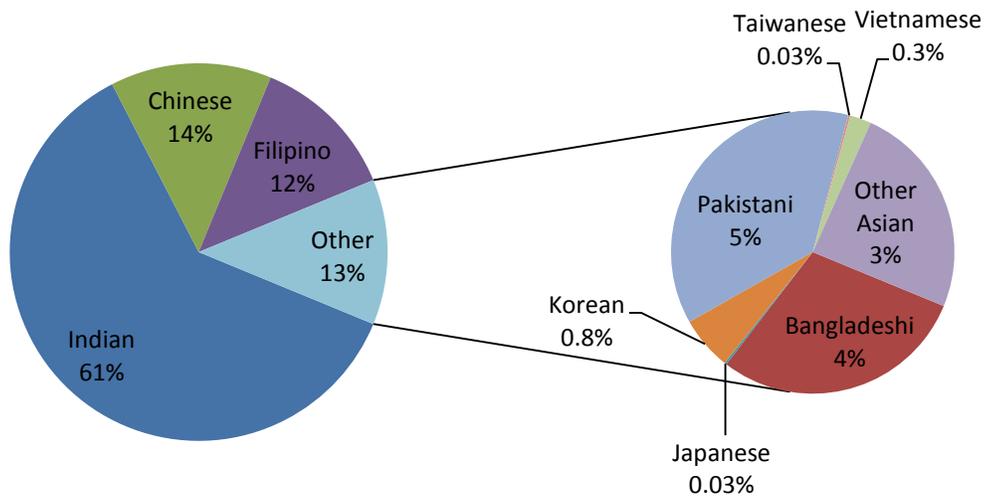


City Council District 32

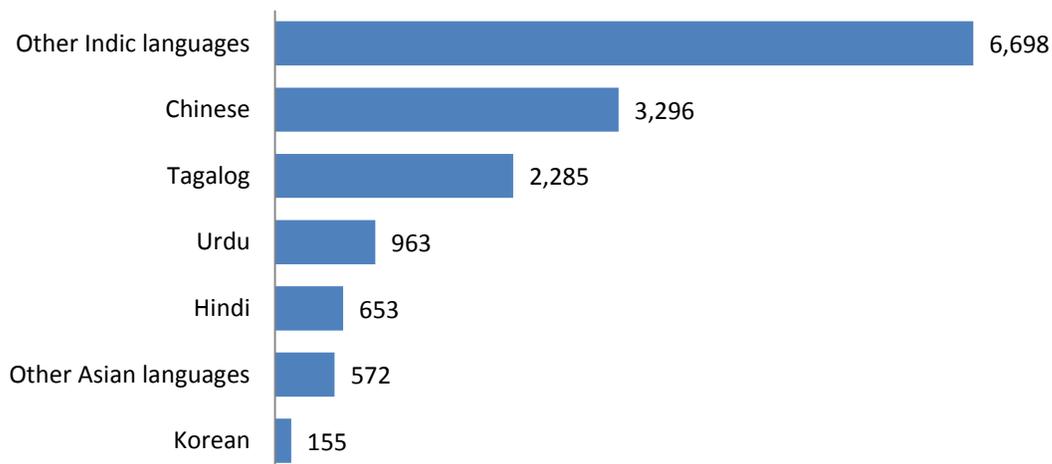
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

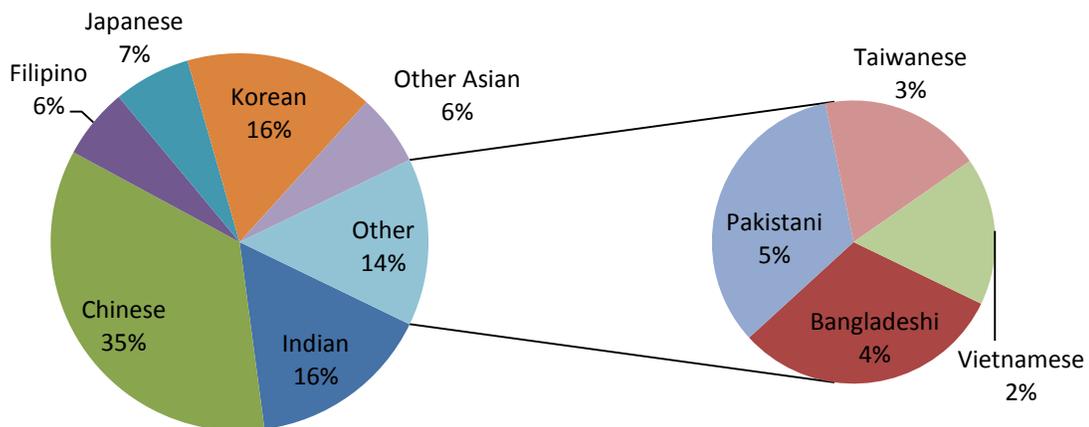


City Council District 33

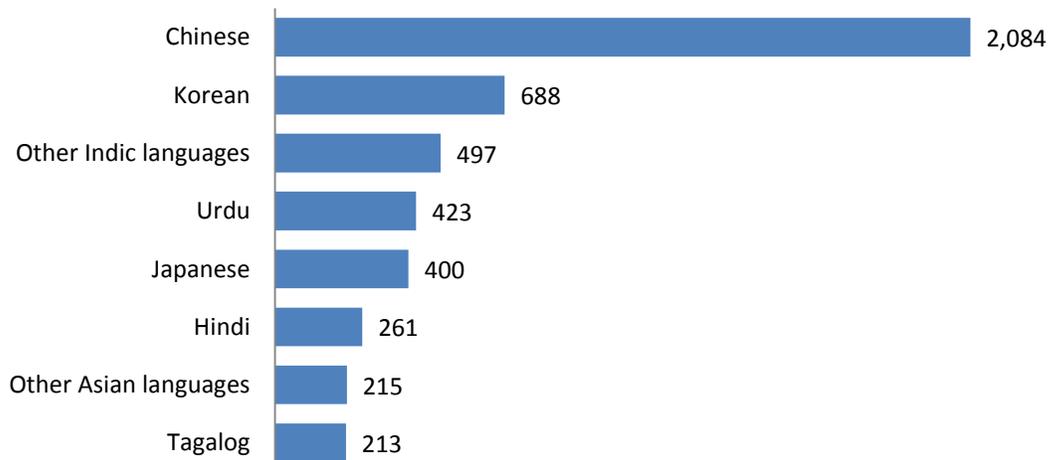
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

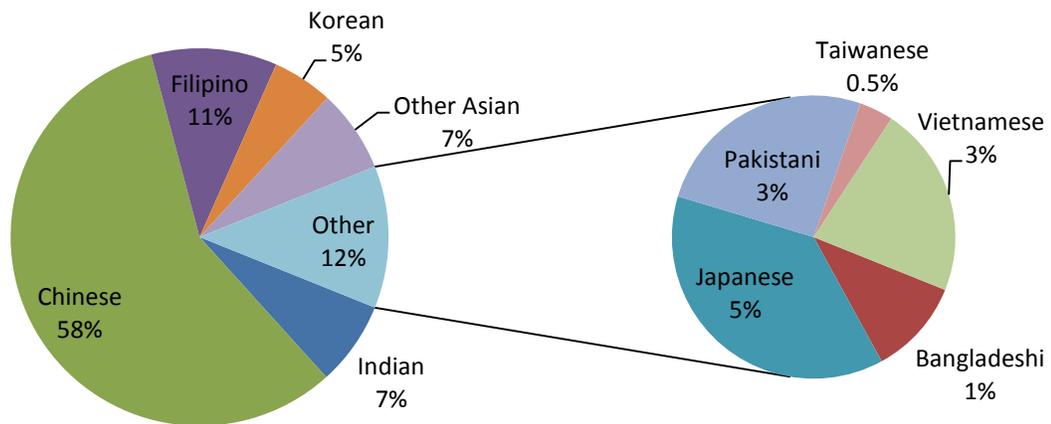


City Council District 34

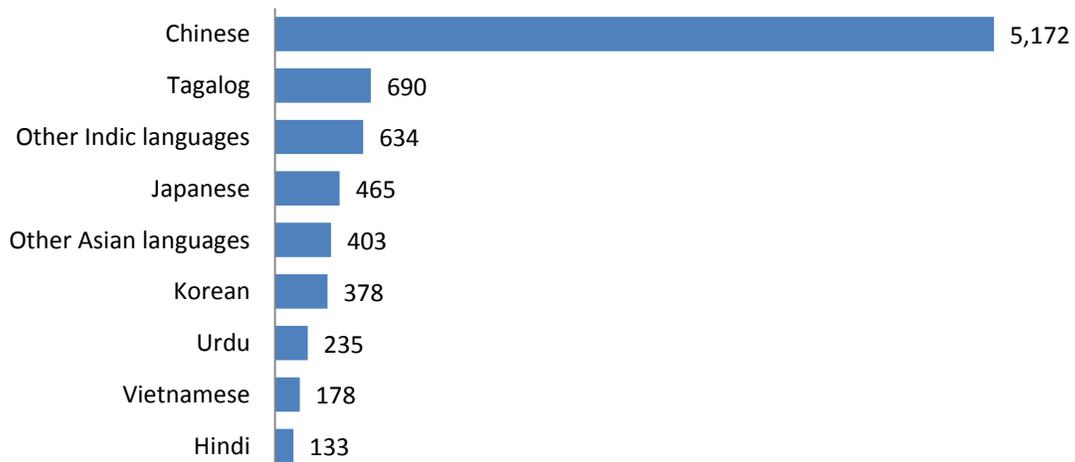
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

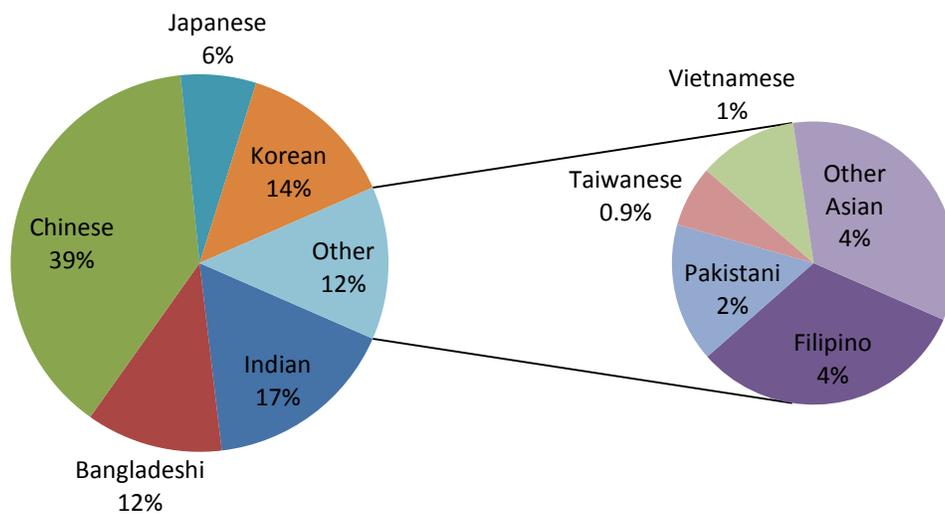


City Council District 35

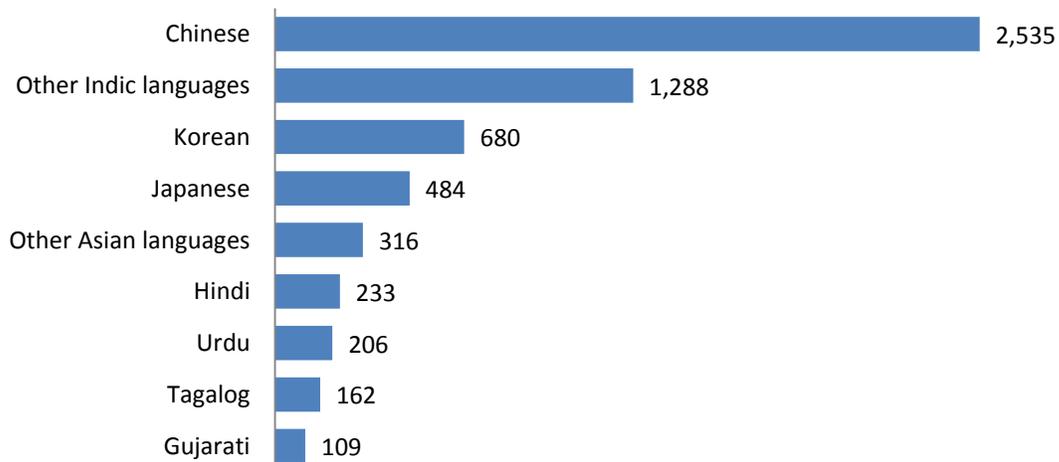
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

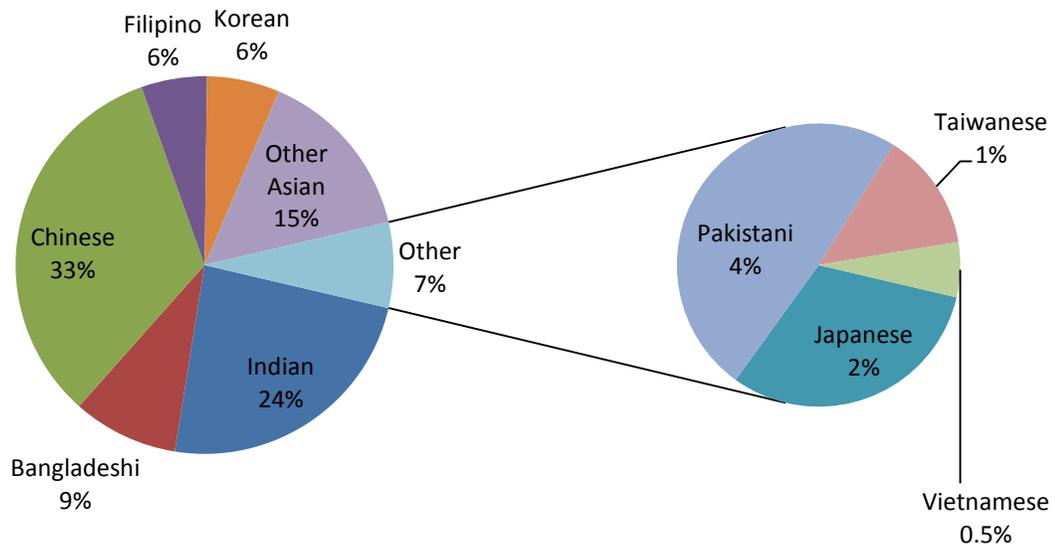


City Council District 36

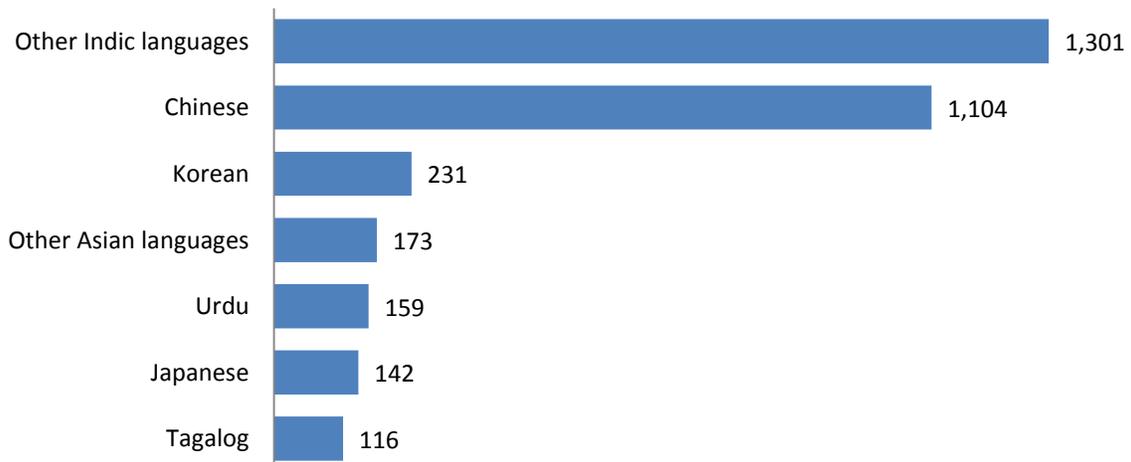
Asians as a Percent of District



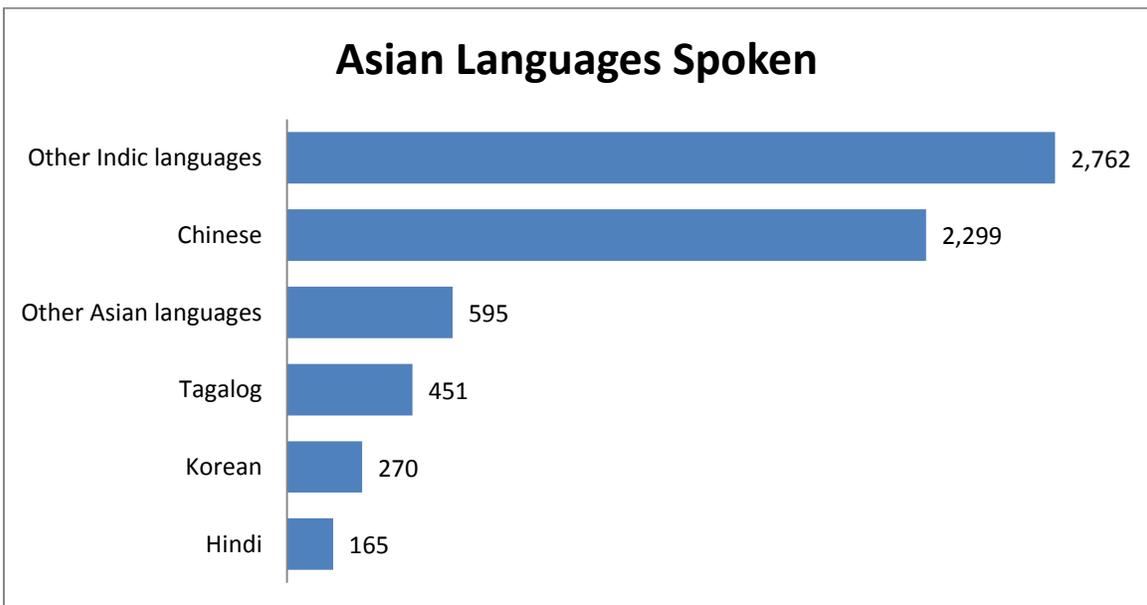
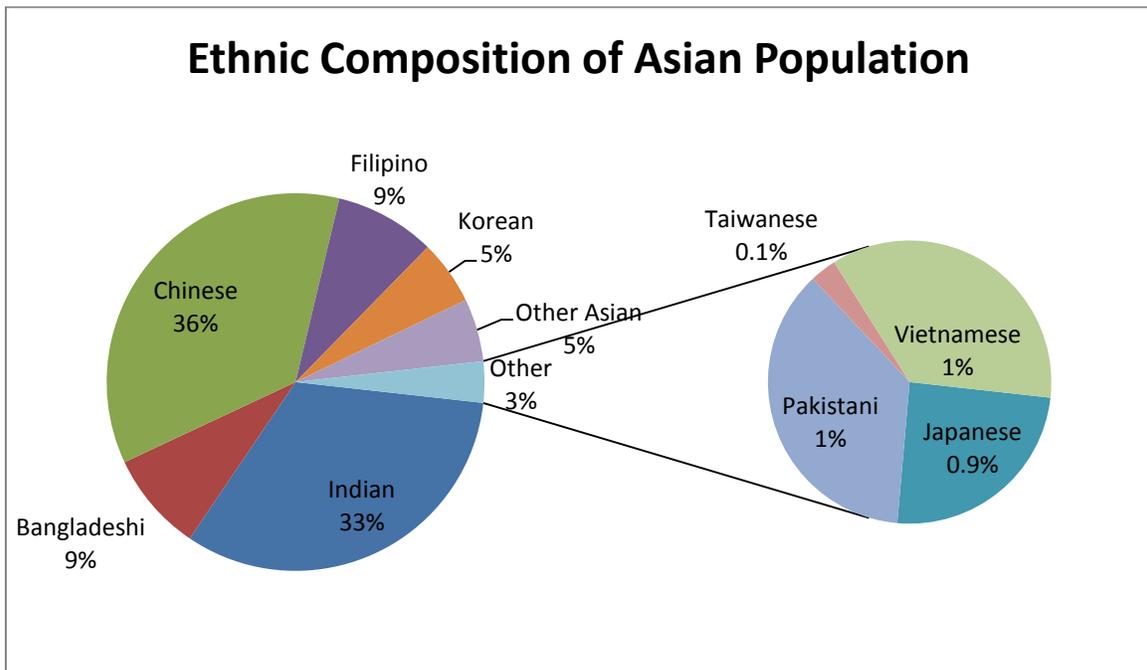
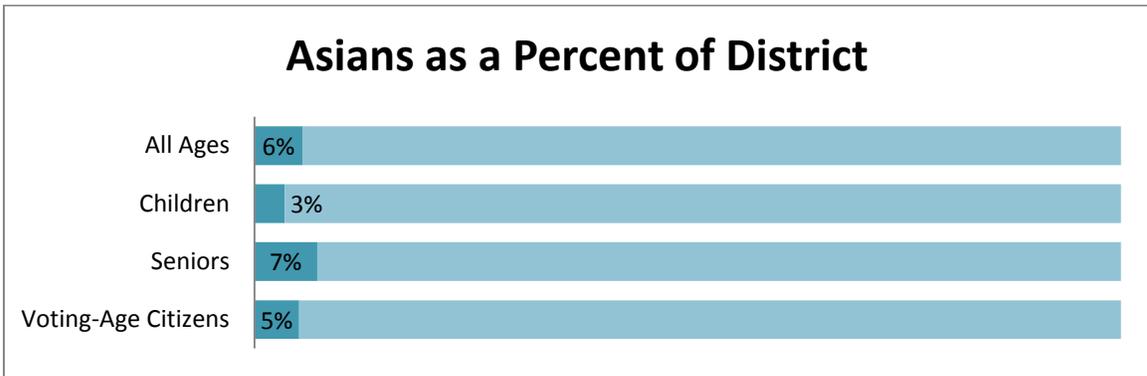
Ethnic Composition of Asian Population



Asian Languages Spoken

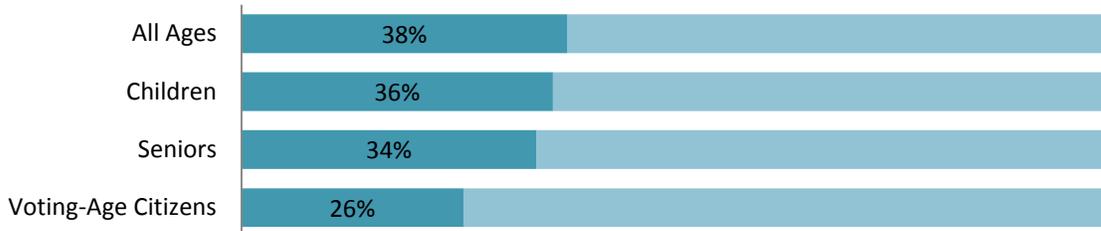


City Council District 37

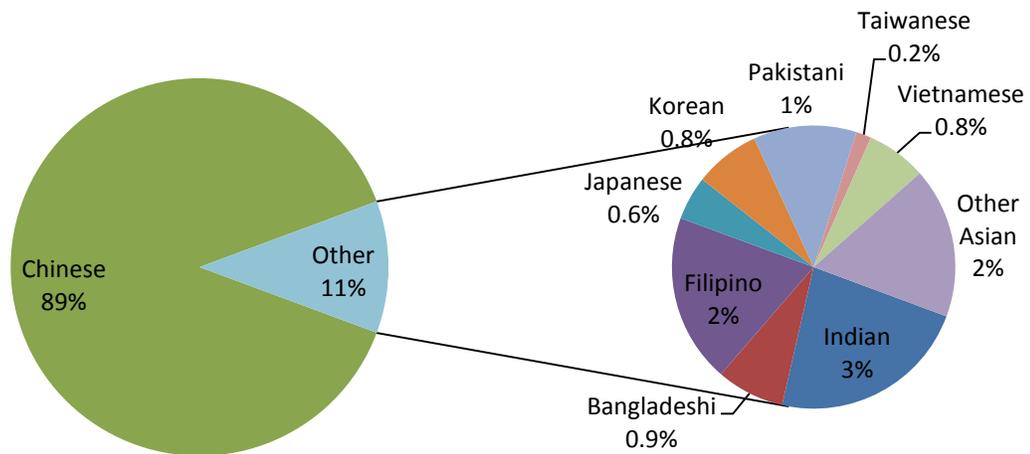


City Council District 38

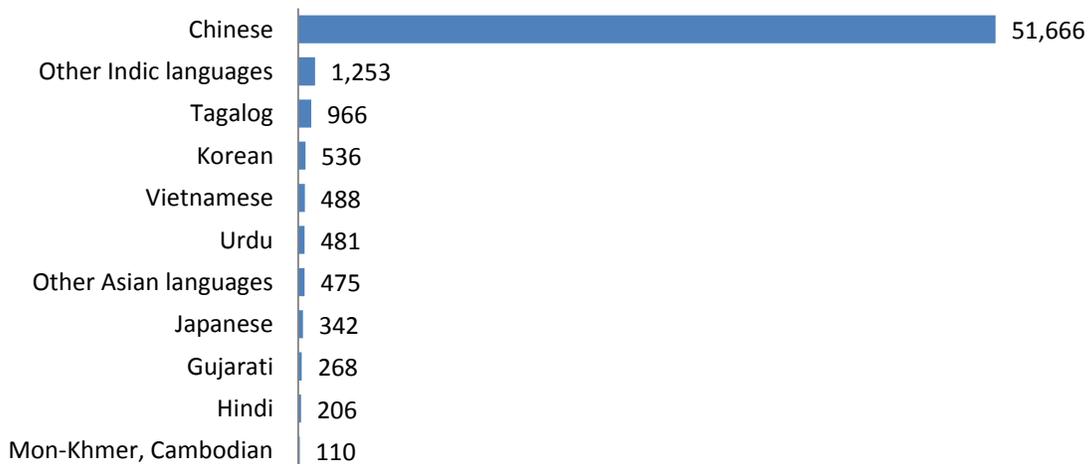
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

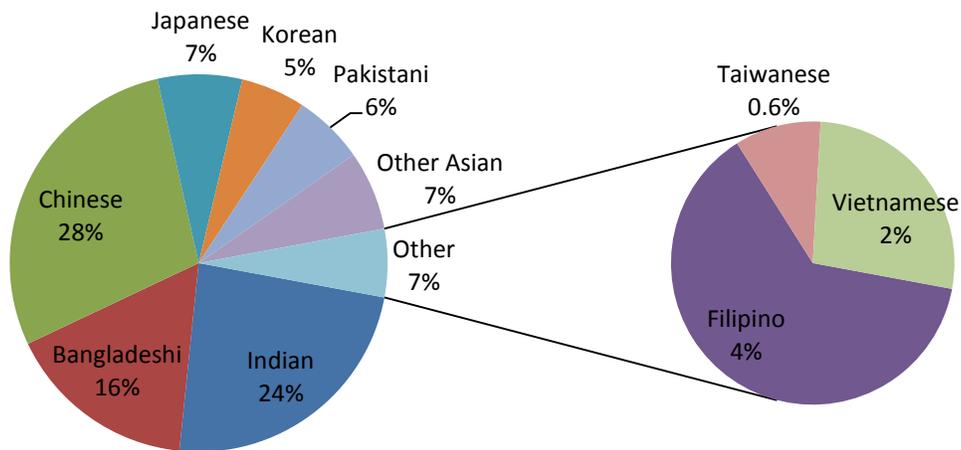


City Council District 39

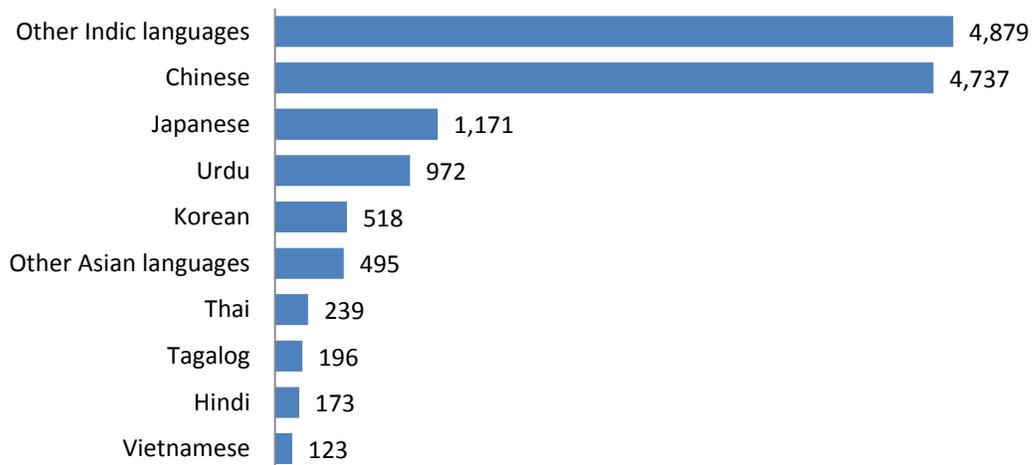
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

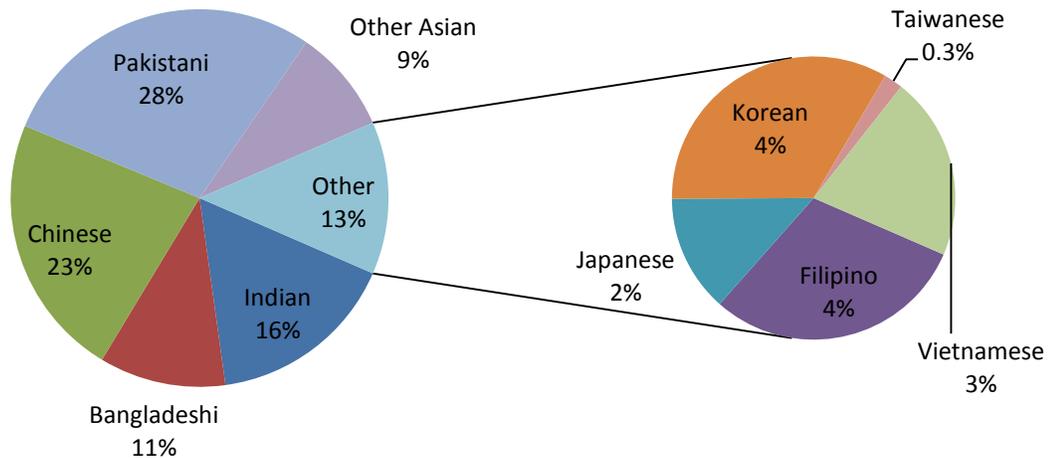


City Council District 40

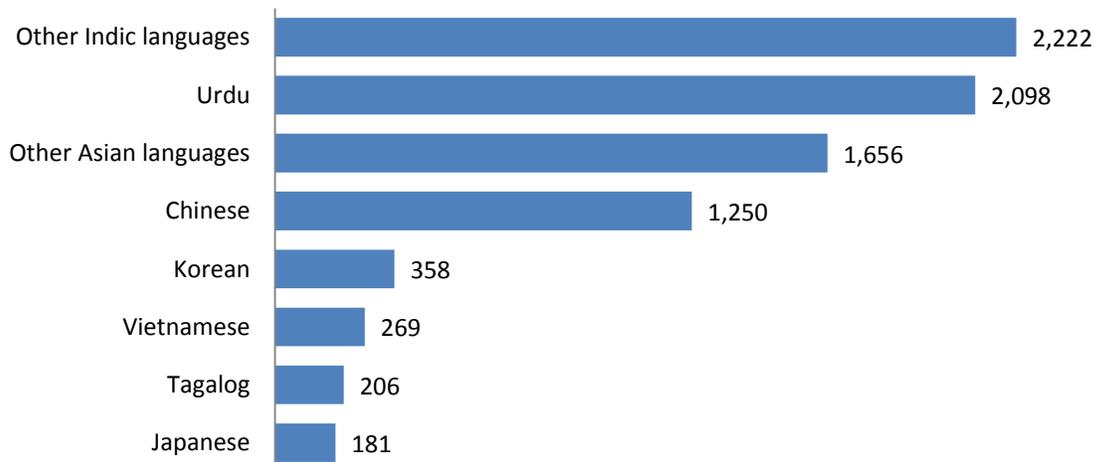
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

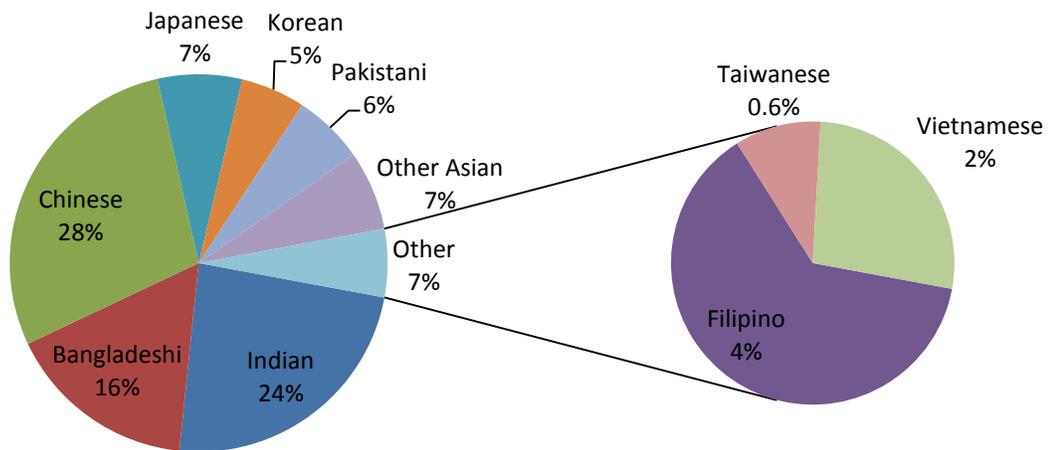


City Council District 41

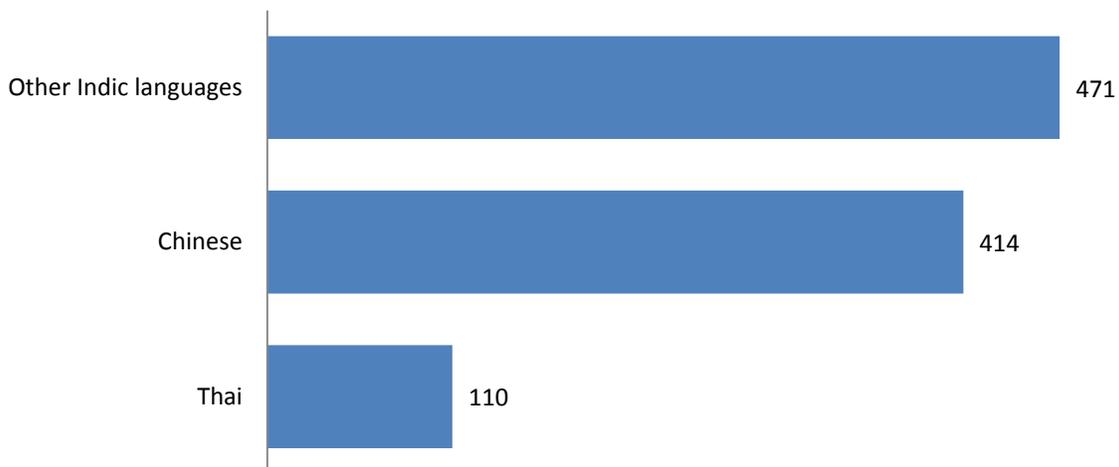
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

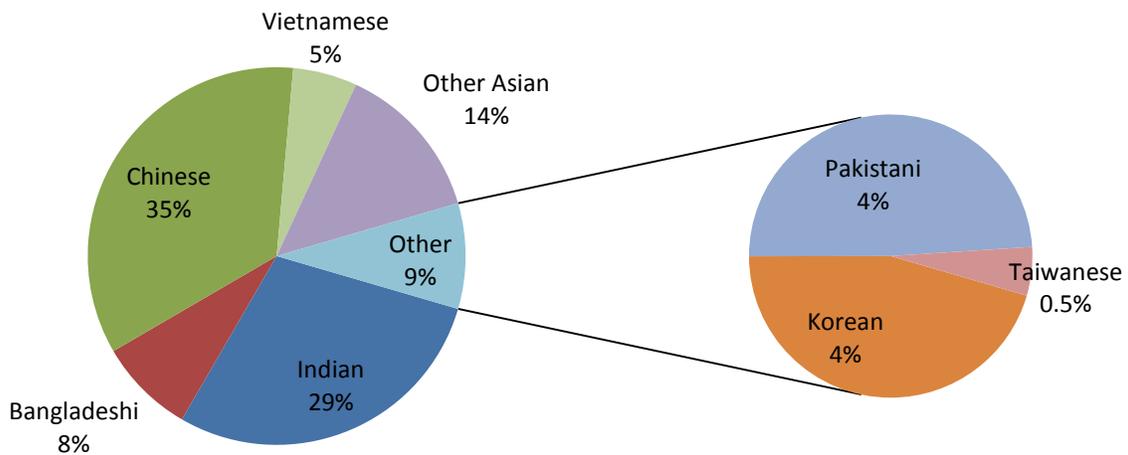


City Council District 42

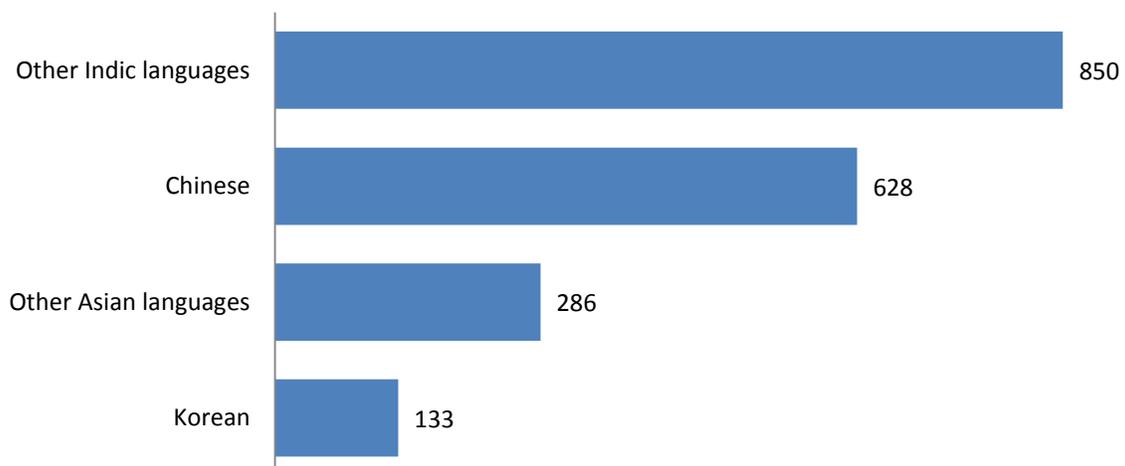
Asians as a Percent of District



Ethnic Composition of Asian Population

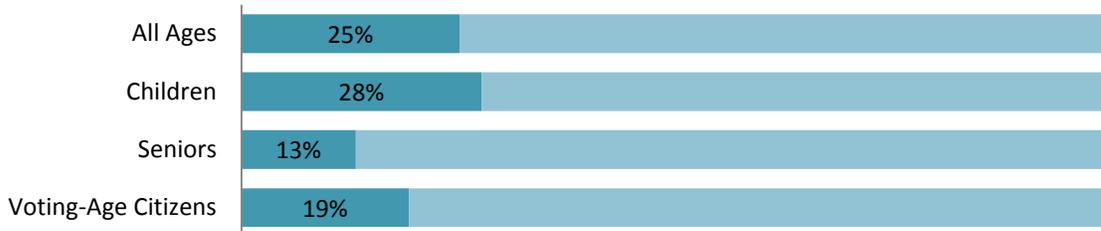


Asian Languages Spoken

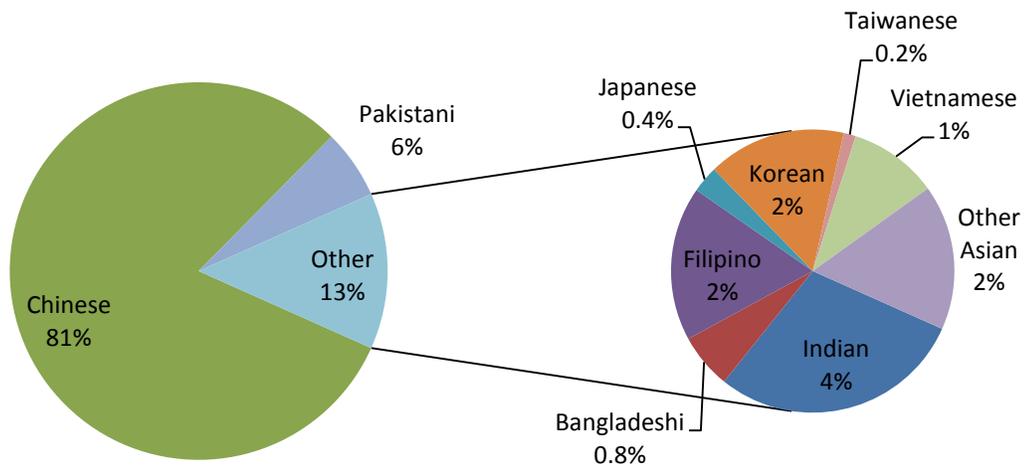


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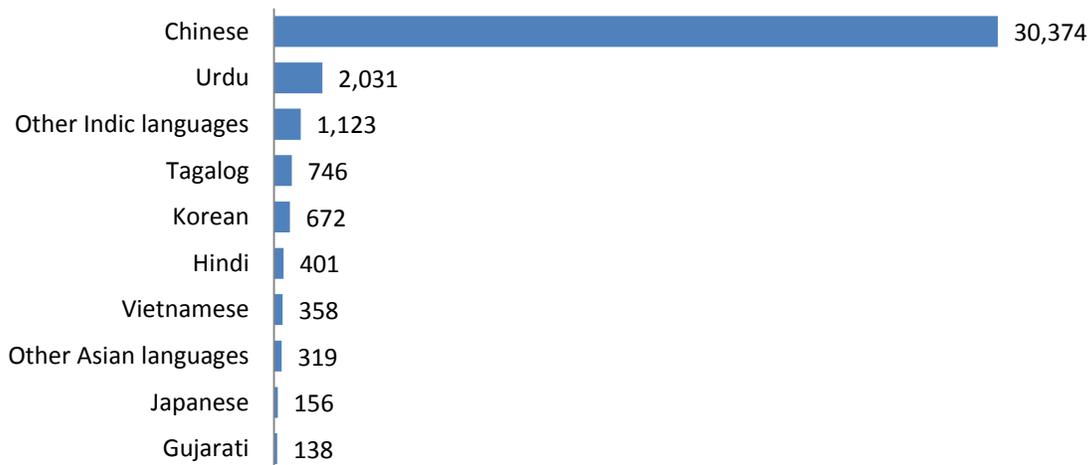
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

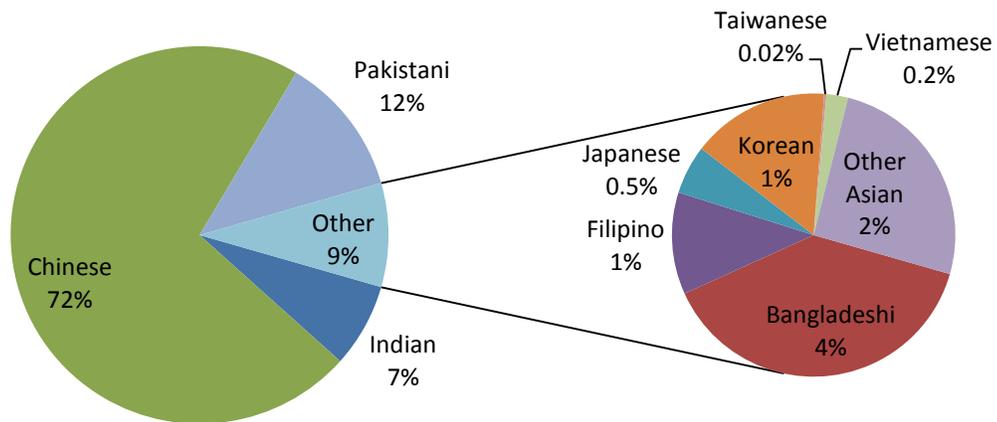


City Council District 44

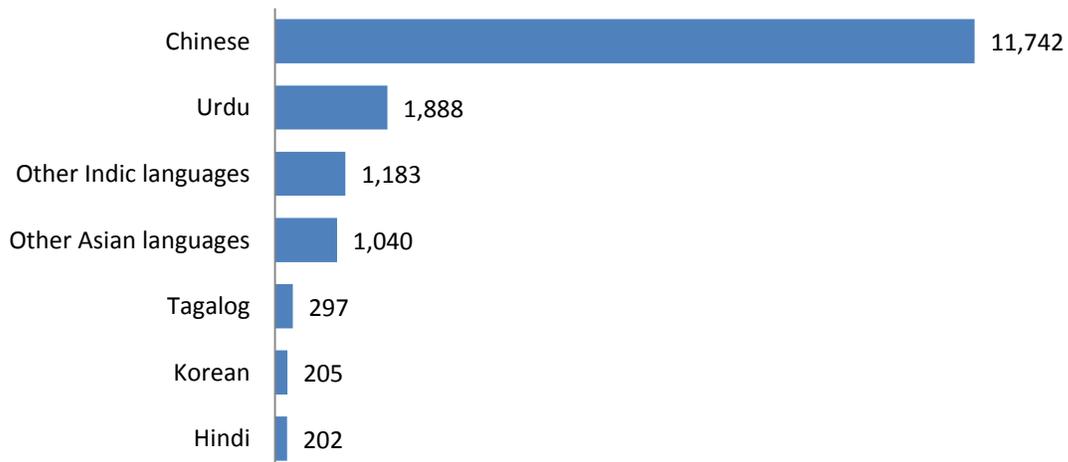
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

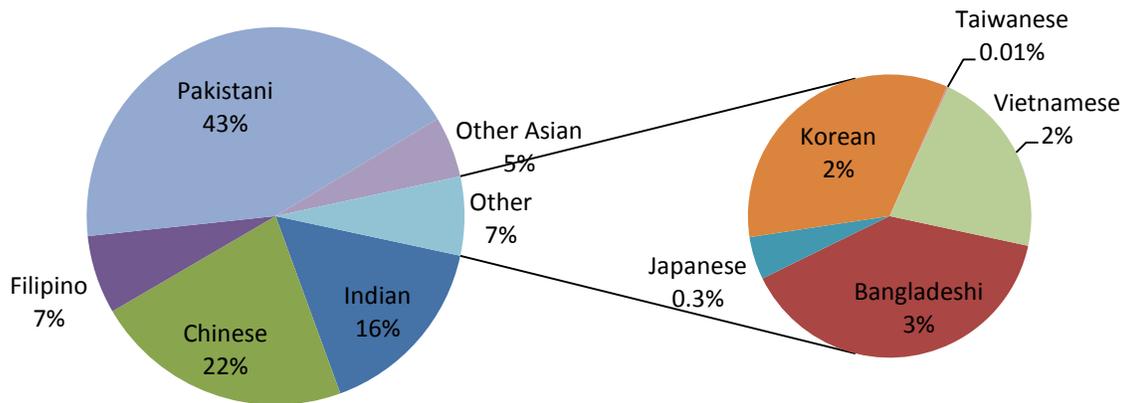


City Council District 45

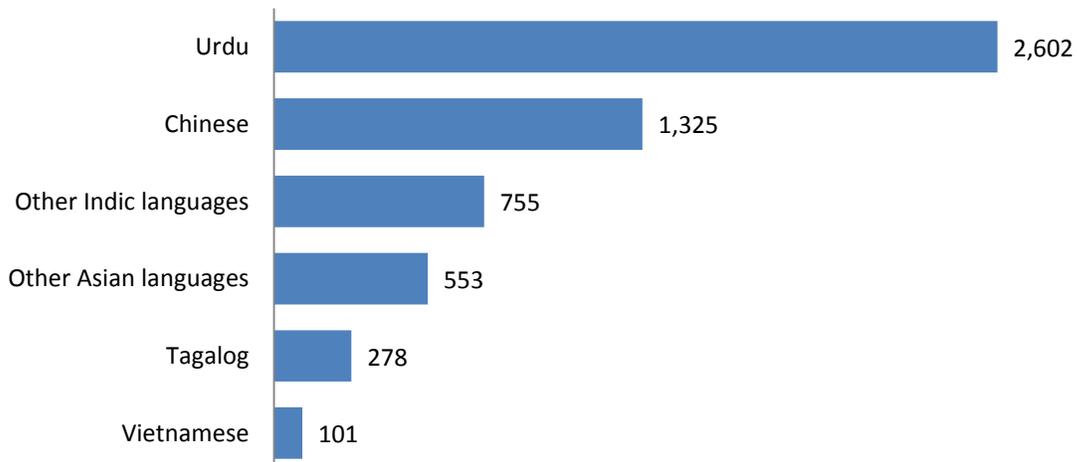
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

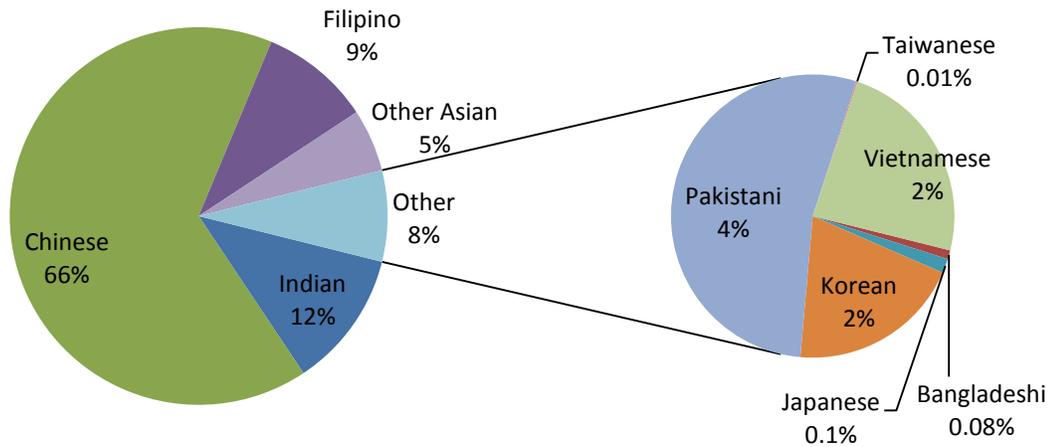


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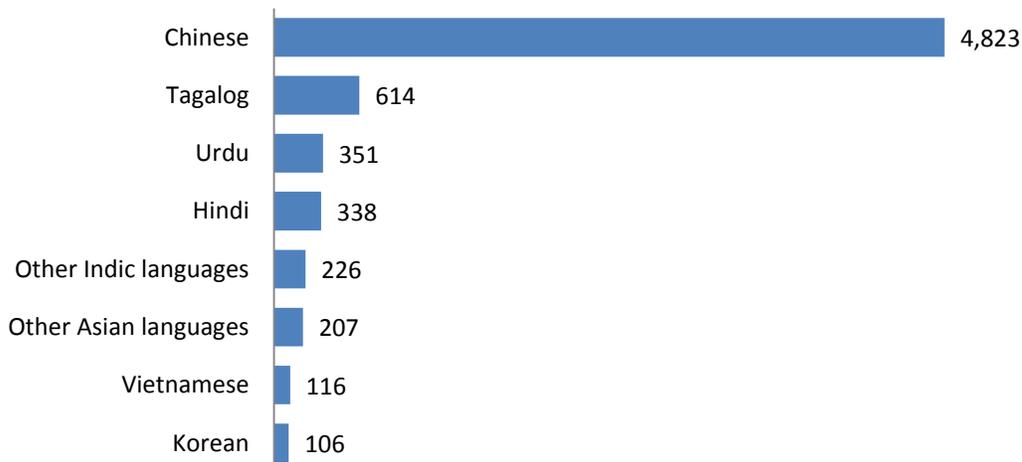
Asians as a Percent of District



Ethnic Composition of Asian Population

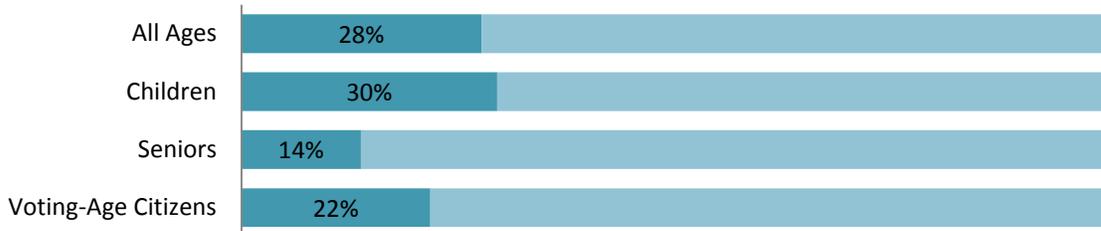


Asian Languages Spoken

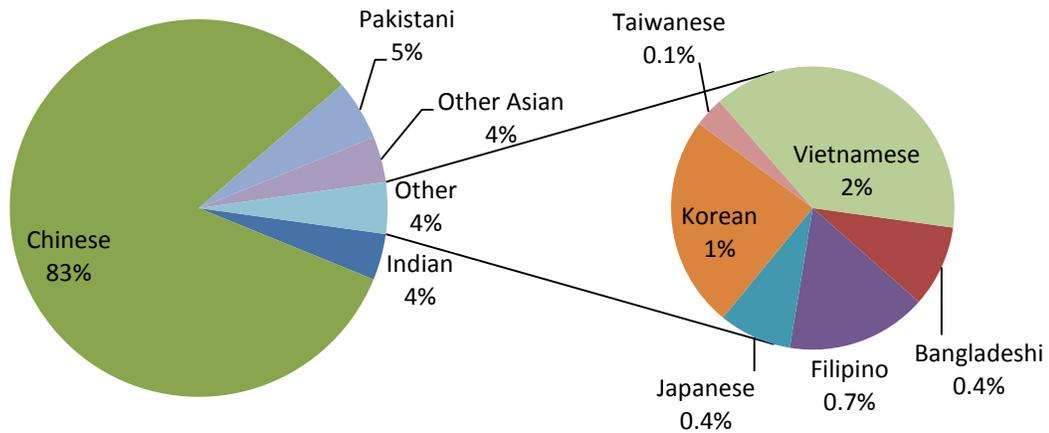


City Council District 47

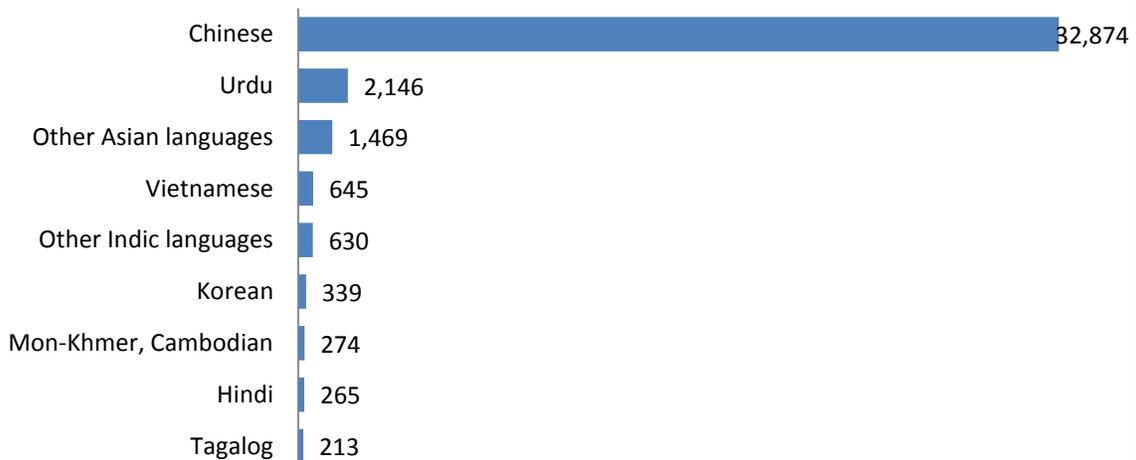
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

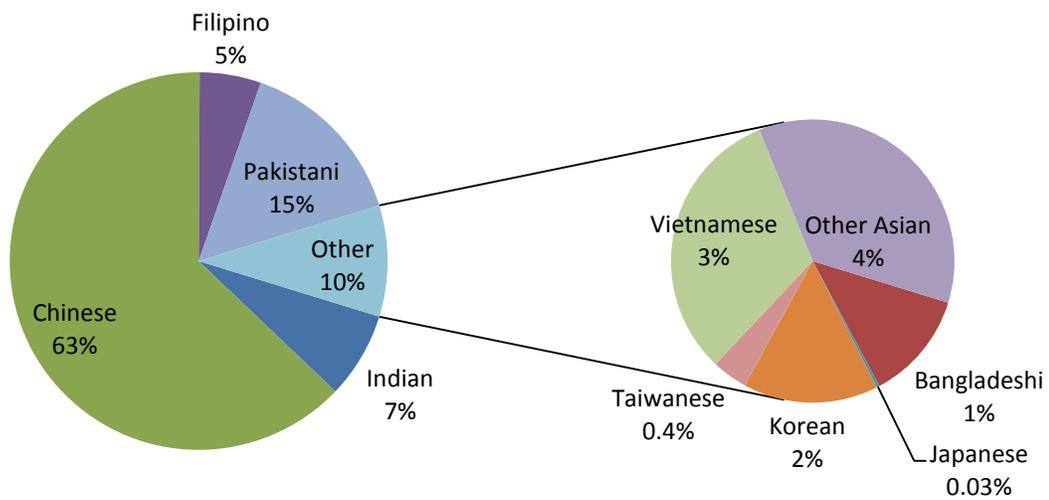


City Council District 48

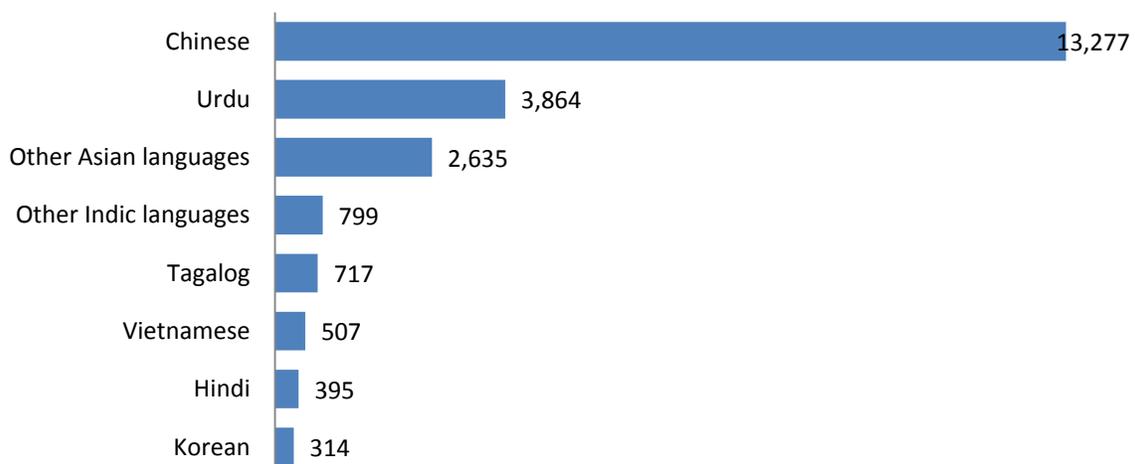
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

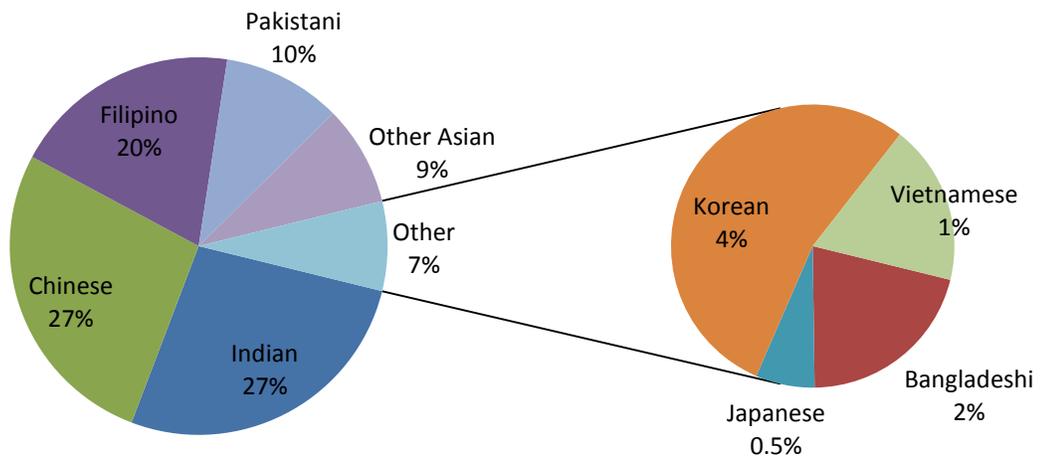


City Council District 49

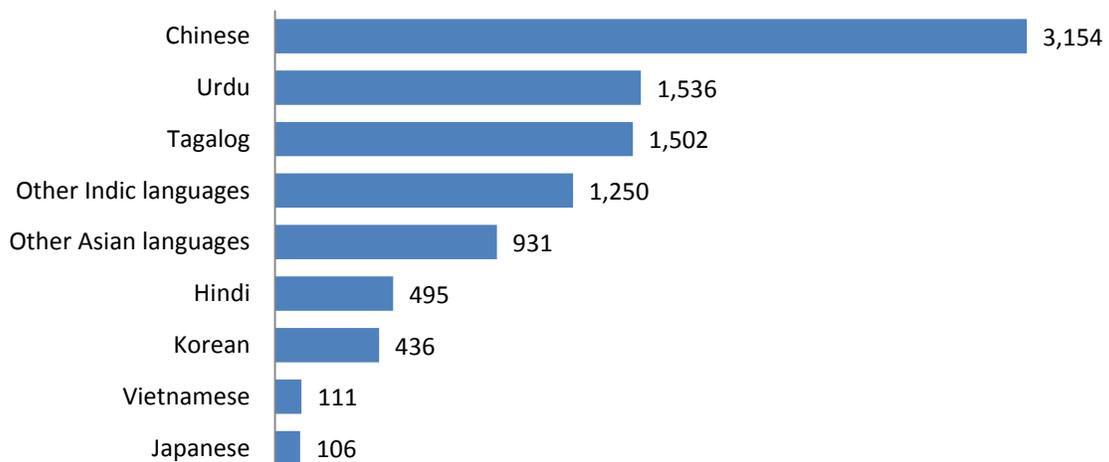
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

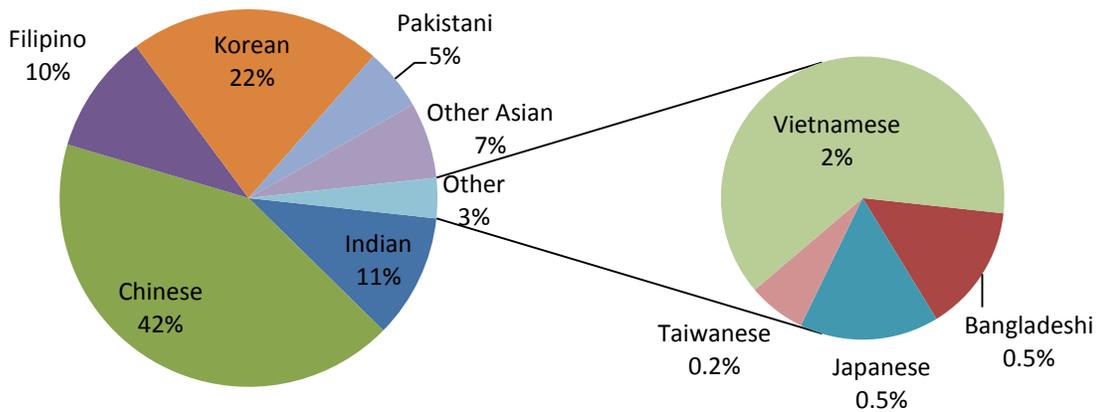


City Council District 50

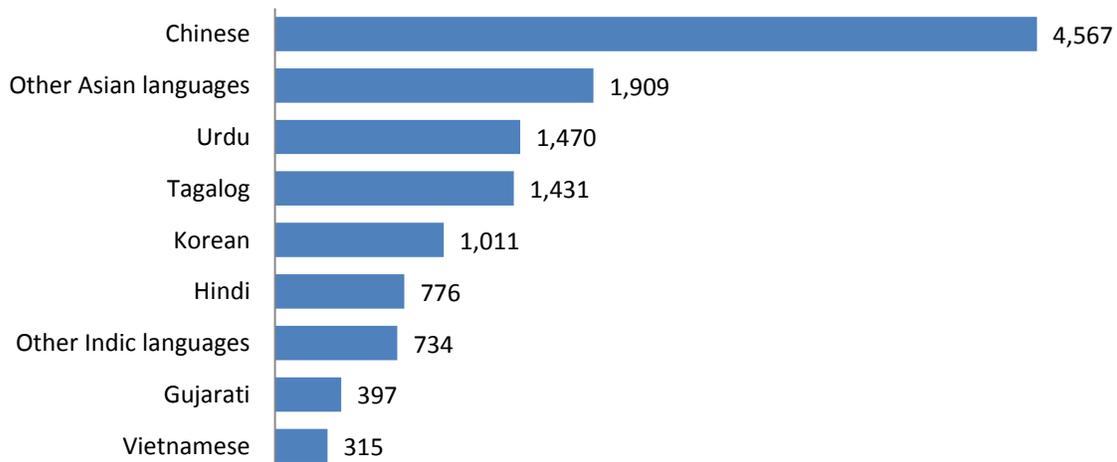
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken

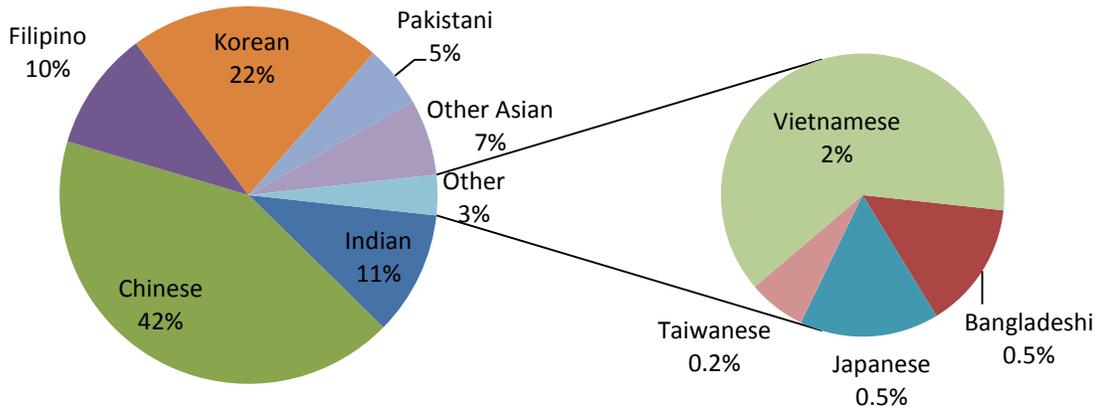


City Council District 51

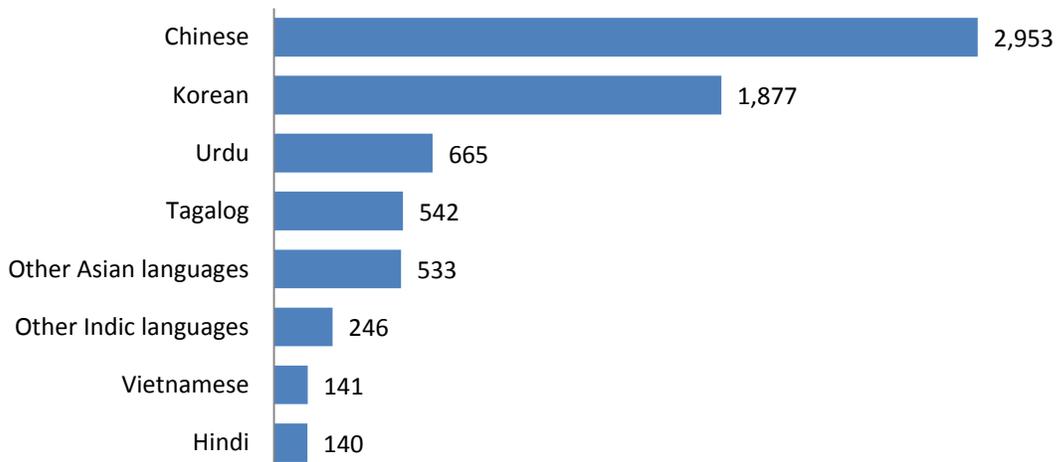
Asians as a Percent of District



Ethnic Composition of Asian Population



Asian Languages Spoken



1. **We request that the City increase language access services from 6 languages to 10 languages.**
2. **Once a language is included in language access laws, the City must continue to support that language even if the language later does not meet the top six language requirements.** When Local Law 73 was passed in 2003, the six covered languages were Arabic, Chinese, Haitian Creole, Korean, Russian, and Spanish. Today, going by the number of limited English proficient speakers, the top six languages now include Bengali and no longer include Arabic. However, the number of Arabic LEP speakers continues to rise, with an estimated 22,000 in 2000 and 27,000 in 2014. The law should be phrased so that new languages are covered when they reach a threshold. For example, Bengali should be included now that it is a top six language. Existing languages, like Arabic, can only be removed if there is no longer a demand for translations (i.e., if an agency's internal data shows minimal requests for services in a particular language).
3. As for specific languages, the pan-Asian community would benefit greatly from the addition of **Hindi, Urdu, and Bengali**, which reflects the increase in population in the pan-Asian community. Moreover, we ask for the inclusion of a mechanism that supports the majority languages spoken in neighborhoods that demonstrate the need for language access support, especially as they are too small to rise to the top 10 languages.
4. Some agencies already do an effective job of tracking the language needs of their clients through their intake data systems. **These agencies should rely on these real-time numbers rather than a biennial sample survey of their service population.** Agencies that do collect data on language needs of their service population should be required to report out the data on a more frequent basis, perhaps annually.
5. We also suggest that **all language access surveys include an evaluation component on the quality of the language access services being provided.** We need a mechanism to evaluate the quality of the translations and the delivery of language access, whether in-person, by phone, by computer, or via translated forms. These surveys should be used to help improve service delivery and ensure that clients receive language access in methods best suited for their needs.



**Testimony of Amaha Kassa, Esq.
Executive Director, African Communities Together
Regarding New York's Language Access Services
November 17, 2016**

Mister Chairman, Honorable Councilmembers, ladies and gentlemen: thank you for giving me the opportunity to testify about New York's Language Access Policy.

I am the Executive Director of African Communities Together, an organization of immigrants from Africa and their families. Our members come from 54 countries and speak hundreds of languages. ACT has worked on a range of language access issues for the past four years, including advocating for NY to translate the IDNYC application into French, working with Small Business Services to adopt French as a priority language, and reviewing the draft French translation of voter registration forms for the Mayor's office. Currently, ACT is incubating an African language interpreter cooperative to meet the need for high-quality African language services.

Our community, New York's African immigrants, is large and growing: official City sources estimate 130,000 African-born New Yorkers. Compare that to some of New York's other well-known immigrant communities: about 76,000 Russians, 73,000 Koreans, 73,000 Indians, and 94,000 Haitians.

But while Executive Order 120, New York's current Language Access policy, includes among its "top six Limited English Proficient languages" Russian, Korean, Bengali, and Haitian Creole, it does not include French, the most widely shared language of African New Yorkers after English; it does not include Arabic; and it does not include any of the indigenous languages of Africa. In effect, the entire continent of Africa as well as the entire Middle East region has been left out of the City's Language Access Policy.



We commend the City Council for moving to codify the Language Access Policy in legislation. As the recent election demonstrates, executive orders are only as good as the next executive to hold the job.

But we urge the Council to improve on the Executive Order as well, by increasing the number of top LEP languages from six to at least eight, and ensuring that French and Arabic are included among the top LEP languages.

The City estimates that there are 26,000 LEP Arabic speakers, 24,000 LEP speakers of African languages, and 22,000 LEP French speakers. However, those numbers are likely an underestimation. To estimate LEP populations, the City relies on Census Bureau questions that ask respondents which language they “speak at home.” These questions do not account for African immigrants, many of whom speak local languages like Wolof, Fulani, or Kru at home, but use French and Arabic for official business, higher education, and inter-group communication. We have included in your packets maps created by City Planning which show how the number of likely French speakers is significantly larger than official estimates.

A number of City agencies have recognized their growing service populations of French and Arabic speakers and adopted French, Arabic, or both as priority languages for their agencies, including Administration for Children’s Services, Department of Education, Health and Hospitals, Department of Homeless Services (French only), Human Resources Administration (Arabic only), and Department of Youth and Community Development (Arabic only).

In addition to large populations and fairness, there are other strong policy reasons to prioritize French and Arabic. Unlike other LEP languages, the population that speaks French and Arabic is rapidly growing vs. rapidly shrinking. French and



Arabic speaking communities are younger, and more recently arrived, and thus more likely to use City services more intensively.

To ensure that the Language Access Policy achieves its intended purpose, we urge the Council to change the draft provision which states that the City's top LEP languages will be solely determined "by the department of city planning, based on United States census data" (§2(c)(1)(ii), Draft Local Law).

Instead, we urge the City to apply the "five-factor" test, which the draft Language Access Policy instructs City agencies to use to determine their top LEP languages, to determining the City's top LEP languages. The five-factor test takes into account 1) the number or proportion of LEP speakers, 2) frequency of contact between the population and City agencies, 3) importance of City services to the population, 4) agency resources, and 5) data from language usage surveys. (§2(c)(1)(ii), Draft Local Law). If the five-factor test is good policy for City agencies and departments, why isn't it good policy for the City as a whole?

We also strongly support increased use of indigenous African languages, if not as top LEP languages for the City, then at the level of specific neighborhoods and facilities which serve large concentrations of Africans. Examples include the Bronx District 9 schools, Harlem Hospital, community policing in Park Hill on Staten Island, and Small Business Services working with African merchants in Bed-Stuy and Crown Heights. We think that targeted African language expansion can be accomplished through the language usage surveys and language access plans proposed by the draft legislation, provided that the City partners with immigrant community organizations to ensure that surveys reach populations who need City services, not just those who are already using them.



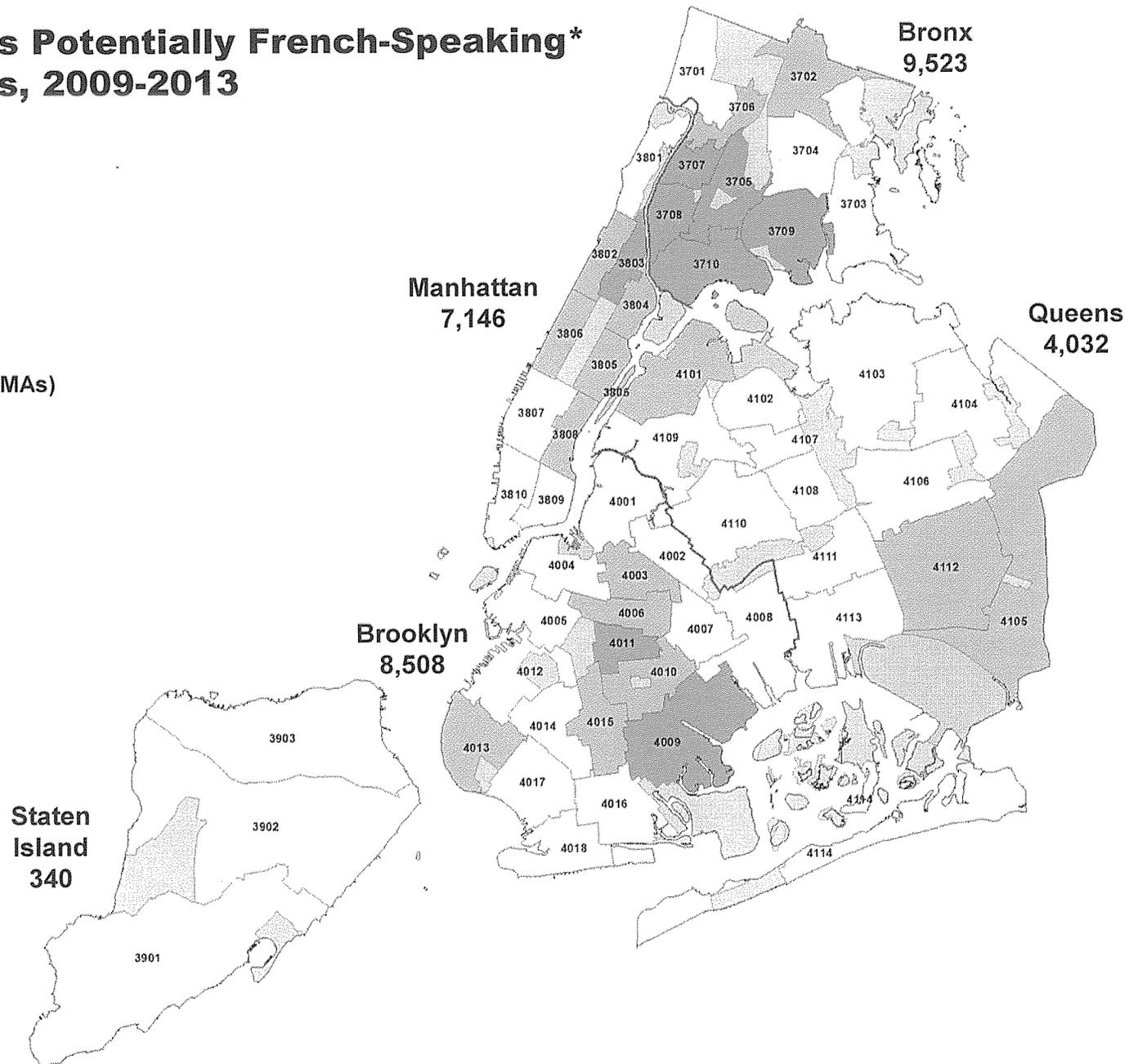
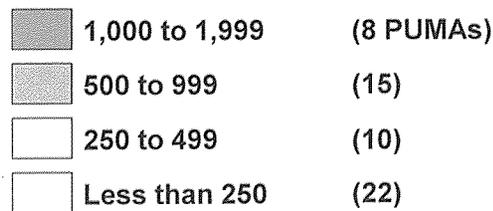
To sum up, we urge the Council to increase the number of top LEP languages from six to at least eight, to ensure that French and Arabic are included among the top LEP languages, to use the five-factor test to determine the City's top LEP languages, and to support increased use of indigenous African languages at the neighborhood level by partnering with immigrant community organizations on language usage surveys and language access plans.

Thank you, Merci, Shukran, and I Ni Che.

LEP Population that is Potentially French-Speaking* New York City PUMAs, 2009-2013

New York City = 29,549

Total

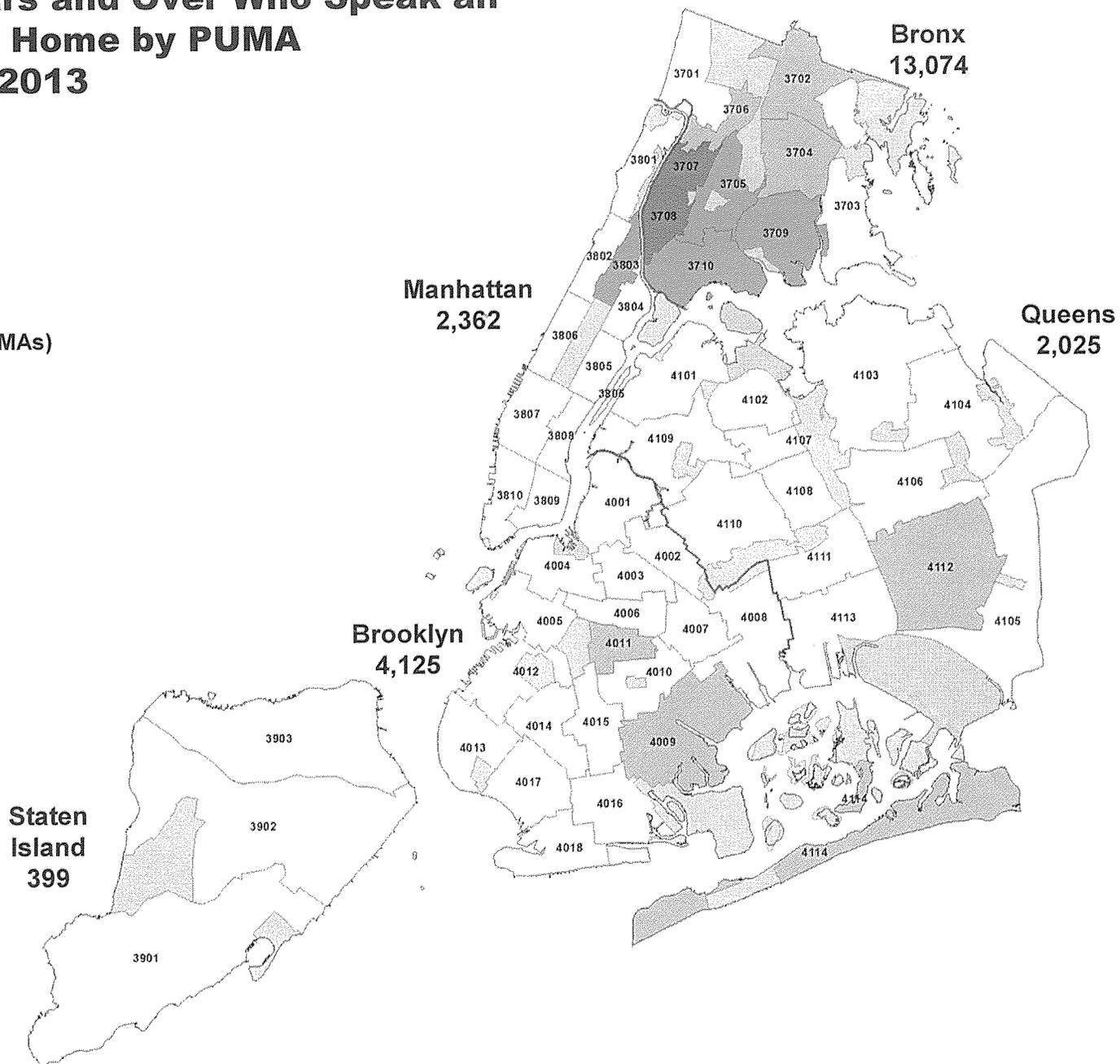
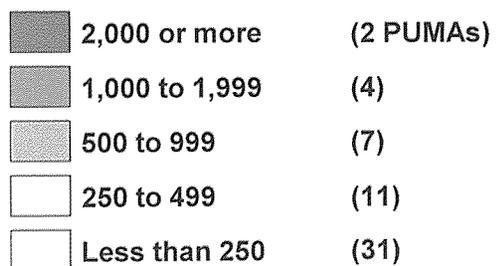


*The LEP population that is potentially French-speaking (29,549) includes those who speak French at home (22,148), as well as those who were born in African Francophone countries who do not speak French at home (7,401), but potentially speak it as a second language.

LEP Population 5 Years and Over Who Speak an African* Language at Home by PUMA New York City, 2009-2013

New York City = 21,985

Total



*Includes African, Afrikaans, Amharic, Bantu, Cushite, Fulani, Krio, Kru, Ibo, Yoruba, Mande, Swahili, and other specified African languages



150 Court Street, 3rd Fl
Brooklyn NY 11201
T: 718 643 8000
F: 718 797 0410

37-10 30th Street, 2nd Fl
Queens NY 11101
T: 718 937 8000
F: 347 808 8778

Family Justice Center
350 Jay Street, 15th Fl
Brooklyn, NY 11201
T: 718 250 5035

Family Justice Center
126-02 82nd Avenue
Queens, NY 11415
T: 718 575 4500

Family Justice Center
126 Stuyvesant Place
Staten Island, NY 10301
T: 718 697 4330

Arab-American Family Support Center's Testimony in Support of Int. 1181-2016

Established in 1994, AAFSC is the first and largest Arabic-speaking, trauma-informed social service agency in New York City. As a settlement house and member of United Neighborhood Houses (UNH), AAFSC has taken the initiative to provide culturally and linguistically competent services to the Arab, Middle-Eastern, Muslim, and South Asian immigrant communities throughout the five boroughs. We offer six main programs: the Preventive Services Program, Adult Education and Literacy Program, Health Program, Youth Program, Anti-Violence Program and Legal Services Program. Last year, our Adult Education and Literacy Program registered over 500 students.

AAFSC is headquartered in Brooklyn, home to the third largest Arab-American community in the country. Arabic is the 4th most widely spoken language among English Language Learners in New York City. Furthermore, according to the Asian American Federation, 60% of Bangladeshis, 40% of Pakistanis and 25% of Indians in the City are not proficient in English.

At AAFSC, we know how significant an impediment language barriers can be in everyday life, let alone when dealing with the complexities of New York City bureaucracy. As members of our communities navigate the neighborhoods, cultures, and political system of their new home, they should be able to depend upon the services of governmental institutions that are meant to act as a public resource to all. On behalf of all immigrant communities of New York City, we resolutely support Intro 1181, and the development of language access policies and plans throughout the city's governmental agencies.

There has been very little data collected about Arab Americans across the United States. In fact, in the US Census, Arab Americans are classified as Caucasian, making collecting data and demographic information, as well as conducting large-scale needs assessments extremely difficult. This has rendered the Arab-American population, and their needs, largely invisible. We further hope that Intro 1181 will advance New York City agencies' capacity to deliver services based on disaggregated racial and socio-economic data, so as to mitigate this significant issue, at least on a local level.

Our communities should always have the right to fully utilize city services. However, in this climate of pervasive and dangerous anti-Muslim bigotry, the AMEMSA communities of New York City are vulnerable, exposed, and alienated. This is only exacerbated by linguistic isolation. More than ever, these communities need the support of the city, and this is why we commend Intro 1181, which gives all New Yorkers equal access to governmental services. Increasing language access would not only enable our communities to be able to rely the health care system if needed, have a greater understanding of crucial information regarding their rights, and be more engaged in their children's educations; it would also show them that they are valued as fellow New Yorkers, and are as much of an integral part of this vast and diverse city as everyone else.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: AMAH A KISS (PLEASE PRINT)

Address: _____

I represent: ACT

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: Sami Disu (PLEASE PRINT)

Address: _____

I represent: Black Alliance for Just Immigration

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: CATHERINE BARNETT (PLEASE PRINT)

Address: _____

I represent: RESTAURANT OPPORTUNITIES

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Catherine Barnett

Address: 69 Montauk Ave #2 SI NY 10314

I represent: Restaurant Opportunities Center of NY

Address: 275 Seventh Avenue NY NY 10001

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/17/16

(PLEASE PRINT)

Name: JoAnn Yoo

Address: _____

I represent: Asian American Federation

Address: 120 Wall Street

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1181 Res. No. _____

in favor in opposition

Date: 11/17/2016

(PLEASE PRINT)

Name: Aber Kawa

Address: 8801 Bay Parkway

I represent: The Arab American Association

Address: 7111 5th Ave

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. 1181 Res. No. 2016

in favor in opposition

Date: 11/17/2016

Name: Peter Gee (PLEASE PRINT)

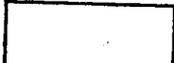
Address: 555 Broome Street

I represent: The Door

Address: 555 Broome Street

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: IBRAHIMA BARRY (PLEASE PRINT)

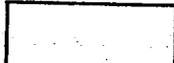
Address: 127 W. 127TH ST

I represent: ACT

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/17/2016

Name: Tsering DhoKa Lama (PLEASE PRINT)

Address: 138 Ositor St

I represent: Adhikar

Address: 71-01 Woodside Av.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)
Name: LAWRENCE BUREH

Address: 127 W 127TH

I represent: ACT

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)
Name: TIFFANY Wheatland

Address: _____

I represent: New York Immigration Coalition

Address: 131 W. 33rd St. NY, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 11/17th/2016

(PLEASE PRINT)
Name: MARIA ROCA

Address: 521 41st St. 11232

I represent: FRIENDS OF SUNSET PARK

Address: SAME

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/17/16

(PLEASE PRINT)

Name: LAWRENCE B. Burch

Address: 331 E 146th St

I represent: AFRICAN Community together

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: AODU KADIRI

Address: 127 W 127th St

I represent: ACT

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: MALADO BARRO

Address: 127 W 127th St

I represent: ACT

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Massange Kamara

Address: 2353 Washington Ave

I represent: Southern TV

Address: 2417 3rd Ave

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Angela Camara

Address: _____

I represent: Southern, Smiling Coast Women

Address: _____
Empowerment Network (SEWN)

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/17/16

(PLEASE PRINT)

Name: Naved Husain

Address: 55 Hester St

I represent: CAADV

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Omar Kodar

Address: 1188 Vyse Avenue

I represent: African Community Together

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: LAMISSE ABDEL RAHMAN

Address: 127 W. 127TH ST

I represent: ACT

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: PAPA MBAUR

Address: 127 W. 127TH ST

I represent: ACT

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Abdou Thiouye

Address: 235 E 117th St #4

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 11/17/16

(PLEASE PRINT)

Name: Roxanne Chang

Address: 23 Stuyvesant Ave #3, Brooklyn, NY 11229

I represent: CAAAV

Address: 55 Hester St, New York, NY 10002

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 11/17/16

(PLEASE PRINT)

Name: Director Mindy Tarlow

Address: 253 Broadway

I represent: Mayor's Office of Operations

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1181 Res. No. 950

in favor in opposition

Date: 11/17/16

(PLEASE PRINT)

Name: Christine Clarke, LS NYC

Address: 403 Worth St, Suite 606 NY NY

I represent: Legal Services NYC

Address: 40 Worth St

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1181 Res. No. _____

in favor in opposition

Date: 11/17/16

(PLEASE PRINT)

Name: Donna Chin, Asian Americans for Equality

Address: 711 Division Street 606 NY NY

I represent: AAFE Services NYC

Address: 711 Division Street

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/17/2016

(PLEASE PRINT)

Name: Commissaire Nisha Agarwal

Address: 253 Broadway

I represent: Mayori office of Immigrant Affairs

Address: 253 Broadway

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/17/2016

(PLEASE PRINT)

Name: Cecilia Gordon

Address: 1831 Madison Ave NY 10035

I represent: Violence Intervention Program

Address: PO Box 1161 Triborough St. 10035

Please complete this card and return to the Sergeant-at-Arms