



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
SCOTT M. STRINGER

February 11, 2020

The Honorable Bill de Blasio
Mayor
City of New York
City Hall
New York, NY 10007

The Honorable Corey Johnson
Speaker
New York City Council
City Hall
New York, NY 10007

Re: Legal Interpreter Bank and Language Services Cooperatives

Dear Mayor de Blasio and Speaker Johnson:

I write today to call your attention to the serious need for interpretation services to expand language access for immigrant communities, particularly for New Yorkers who speak languages of limited diffusion (LLDs), and to memorialize my support for two proposals in the Fiscal Year 2021 budget: a Community Legal Interpreter Bank and language services worker-owned cooperatives for LLDs.

As you know, over the last three years, the Trump Administration has been singularly focused on attacking and disrupting the lives of our immigrant communities. Consequently, policies such as the Muslim ban, the separation of families at our country's southern border, and the increase of federal immigration enforcement efforts deprives immigrants of basic benefits and services. Immigrants who speak LLDs are among those most vulnerable to these abhorrent policies yet are more likely to be underserved or disconnected from existing services – including immigration legal assistance – in part because of a lack of high-quality frontline interpreters.

Language impacts every aspect of immigrant life in New York City. Nearly half of New Yorkers speak a language other than English at home, and nearly one in four have limited English proficiency.¹ According to the Comptroller's Office's analysis of U.S. Census Bureau data, more than 1.2 million people living in New York City speak a language at home that is spoken by fewer than 100,000 people or about 1 percent of the city's population.² Nearly one in five of them, or an

¹ Mayor's Office of Immigrant Affairs, *Language Access Implementation Plan* (2019), https://www1.nyc.gov/assets/immigrants/downloads/pdf/moia_laip_2019_final.pdf.

² Comptroller's Office's analysis of 2013-2017 American Community Survey data. For the purpose of this analysis, LLDs are defined as languages spoken at home by fewer than 100,000 people in New York City, roughly 1 percent of the city's population. This includes more than 100 language categories, some of which include many sublanguages. However, Census data may not capture all LLDs, especially those spoken by a relatively small number of New Yorkers.

estimated 220,000 people, report that they either do not speak English at all or do not speak English well. While the population of LLD speakers is clearly sizeable, the number of individuals who speak any one of these languages can be relatively small. For instance, Census data further indicate that dozens of languages are spoken by fewer than 5,000 people across the boroughs. This makes it a challenge for many non-profit legal services providers to offer the frontline, in-person interpretation that is so advantageous in handling complex cases such as immigration proceedings. Meaningful language interpretation services can make the difference between immigrant families maintaining and accessing housing or facing eviction or foreclosure. Simply put, language access expands access to justice in our courtrooms.

While linguistic barriers are particularly pressing in the legal services context, they cut across City-funded services. Expanding language access opens the door for more immigrant parents to actively engage in their children's school lives through teacher parent conferences and effectively participate in civic life by voting. Language justice requires assistance for LLDs to minimize a Census undercount that will impact political representation and funding for the next decade. If there is truly inclusive language services, thousands of immigrant New Yorkers will receive meaningful job assistance and information on housing subsidies as current rent costs skyrocket. Without it, New York City will fail to live up to our promise as a sanctuary and affordable city for all, not some.

I commend you for increasing funding to support free legal representation for immigrant New Yorkers, including allocating \$16.6 million in Fiscal Year (FY) 2020 for the New York Immigrant Family Unity Project (NYIFUP). As you know, these funds allow NYIFUP providers to represent more detained immigrants in deportation proceedings, which ultimately serves to shorten lengths of stay in federal immigration detention and, in the best circumstances, keep families together. However, the immigration court backlog is extensive, and these and other immigration legal service providers face enormous demand for their services, leaving scarce resources to support high-quality interpretation. Meanwhile, telephonic interpretation services tend to be less desirable than in-person interpretation and also costly. All too often, the important work of interpretation falls on clients' family members and friends or untrained volunteers.

To address this need and increase the supply of interpreters in the city, African Communities Together, Mexican American Students' Alliance, Asian American Federation, and New York Immigration Coalition have put forward a proposal for the City to invest in a Community Legal Interpreter Bank (CLIB). This is modeled on a similar program in the District of Columbia, which would recruit, train, and dispatch legal interpreters to legal services organizations across the city. In order to build the pipeline of language services professionals for the CLIB, and to meet the demand for quality language services in the city more broadly, I am also calling on the City to earmark funding to launch three language services worker-owned cooperatives, one each for African, Asian, and indigenous Latin American LLDs. Hiring locally from these communities will ensure that language services are high-quality while also affirming and culturally responsive. An added benefit is that they would provide a source of income and employment for immigrant New

Yorkers, so many of whom are currently filling language access gaps in their communities without the compensation or security they deserve.

As a down payment on community-driven language access solutions, I urge you to ensure funds are included in the FY 2021 budget for the development of a legal interpreter bank and language services worker-owned cooperatives. African Communities Together, MASA, Asian American Federation, and New York Immigration Coalition have called for an investment of \$3 million: \$2.25 million for the CLIB and \$750,000 to launch the three cooperatives, which would support an estimated 25,000 hours' worth of interpretation services for immigrants who speak LLDs. Funds dedicated to scaling interpretation services would have an outsized impact, meeting critical needs for immigrant New Yorkers across the city and the non-profit community-based organizations on the frontlines of the fight for immigrant justice.

Thank you for your attention to this issue, and I look forward to working together to keep our great city accessible to all, regardless of the language one may speak. Should you have any questions, please contact me or Dylan Hewitt, Director of Intergovernmental Relations, at 212-669-8056 or dhewitt@comptroller.nyc.gov.

Sincerely,



Scott M. Stringer
New York City Comptroller