



CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
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BUREAU OF AUDIT

November 12, 2025

By Electronic Mail

Asim Rehman
Commissioner, Chief Administrative Law Judge
New York City Office of Administrative Trials and Hearings
66 John Street, 10th floor
New York, NY 10038

Re: **Audit Report on the New York City Office of Administrative Trials and Hearings’
Provision of Language Access Services (SZ26-059AL)**

Dear Commissioner Rehman:

This Final Audit Letter Report concerns the New York City Comptroller’s audit of the Office of Administrative Trials and Hearings’ (OATH) provision of language access services and compliance with relevant laws, standards, and guidelines. Language Access laws are intended to make City agencies—and, ultimately, the City as a whole—more accessible to residents whose preferred language is one other than English.

Background

New York City is home to one of the most diverse populations in the world, with more than 3 million foreign-born residents. According to the New York City Department of City Planning, nearly one-half of all New Yorkers speak a language other than English at home, and almost 25% of City residents are not proficient in English. For non-English language preference (NELP) residents, interacting with City government and receiving access to City services can be a challenge.¹ Language services are necessary to ensure that all City residents have equal access to the information and services provided by OATH.

OATH is New York City’s central independent law court. OATH Trials Division adjudicates cases related to employee discipline and disability hearings for civil servants; Conflicts of Interest Board cases; proceedings related to the retention of seized vehicles by the police; City-issued license and regulatory enforcement; real estate, zoning, and loft law violations; City contract disputes; and human rights violations under the City Human Rights Law. OATH’s Hearing Division conducts hearings related to summonses issued by City agencies for alleged violations of law or City rules. The OATH Special Education Hearings Division (SEHD) adjudicates disputes about special education services provided to New York City children. OATH’s Center for Creative Conflict Resolution aims to resolve conflicts, and Hearing Officers at the Hearings Division aim to provide independent and unbiased conclusions in cases brought before them.

New York City Administrative Code, Title 23, Chapter 11, Language Access § 23-1101 (Local

¹ Local Law 30 of 2017 uses the term “limited English proficient” or “LEP”; however, for the purposes of this report, the term “Non-English Language Preference” (or “NELP”) will be used.

Law 30 of 2017) requires all City agencies that provide direct public or emergency services to provide language access services for all designated citywide languages. Currently, those languages are Arabic, Bengali, Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu.² LL30 also requires City agencies to designate a Language Access Coordinator and to develop Language Access Implementation Plans (LAIP). LAIPs consist of the following components: identification and translation of the most commonly distributed public documents; interpretive services, including telephonic interpretation in at least 100 languages; training of frontline workers on language access policies; posting of signage in conspicuous locations about the availability of free interpretation services; and the establishment of an appropriate monitoring and measurement system regarding the provision of agency language services. Agencies were also expected to incorporate consideration of language access into public communications (including emergency notifications, public hearings, and events), and craft widely distributed documents using plain language principles.

The law also requires agencies to develop their LAIPs using the four-factor analysis and to update their LAIPs every three years. In 2023, Local Law 30 was amended to update the requirements for an agency's emergency preparedness. NYC Administrative Code Title 23, Chapter 11, Language Access § 23-1105 (Local Law 13 of 2023) requires agencies to translate relevant documents and other materials and make interpretation services available to temporary languages identified by Office of the Language Services Coordinator. Currently, the temporary languages are Wolof and Pulaar/Fulani.

NYC Administrative Code, Title 23, Chapter 8, City Website § 23-801 (Local Law 25 of 2016) requires all City agencies to include a translation feature on their website enabling users to view text of that website in languages other than English. The website must be translatable into the designated citywide languages and the temporary languages identified per Local Law 13.

This audit also reviewed New York State Executive Law Section 202-A: Language Translation Services, New York State Education Department's (NYSED) LAIP, and New York City Department of Education (DOE) Chancellor's Regulation A-663 to ensure that parents of students with disabilities can receive SEHD services in the languages required by those laws, standards, and guidelines. Those languages are Albanian, Arabic, Bengali, Chinese, French, Haitian Creole, Italian, Korean, Polish, Russian, Spanish, Ukrainian, Urdu, Uzbek and Yiddish.

The objectives of this audit were to determine: (1) whether OATH is providing agency services to the Non-English Language Preference (NELP) population in the languages required by relevant laws, standards, and guidelines; (2) whether the agency's language access services meet the needs of the NELP population as intended; and (3) whether the NELP population has the same access to government services as English-speakers.

Findings

The audit found that OATH complies with the website translation, document translation, and in-person and telephonic interpretation standards prescribed by relevant laws, standards, and guidelines. The language access services provided by OATH generally meet the needs of the NELP population as intended, and the NELP population has the same access to government services as the English-speaking population.

² The New York State language access law refers to the language spoken in the Bengal region of South Asia as Bangala, whereas the New York City language access law refers to that language as Bengali. For consistency, this report will use the term Bengali.

OATH created and implemented an LAIP using the four-factor analysis.³ The LAIP contained all key aspects required by Local Law 30, such as designating a Language Access Coordinator, accounting for telephonic interpretation in over 100 languages, translation of commonly distributed documents into the designated citywide languages, requiring training for OATH staff, addressing language access needs in OATH's emergency preparedness, incorporating public awareness strategies, including a process to monitor and respond to public complaints regarding language access; and requiring that the LAIP be reviewed at least once per year.

To provide interpretation, OATH contracts with Language Line Solutions, a video and telephonic language services vendor.⁴ Language Line can provide interpretation in over 250 languages including the designated citywide languages, the two temporary languages, the 12 most commonly spoken non-English languages in New York State, and the 12 most common parent-preferred languages according to the DOE. Video or telephonic interpretation is available at all OATH trials and hearings, as well as at help centers located throughout the city. For American Sign Language (ASL) services and interpretation, OATH contracts with Accurate Communications, Inc.

For translation, OATH contracts with LM Language Services and Geneva Worldwide.⁵ LM Language Services and Geneva Worldwide both provide translation in over 160 languages including the designated citywide languages, the two temporary languages, the 12 most commonly spoken non-English languages in NY State, and the 12 most common parent-preferred languages in NYC according to the DOE. OATH posts copies of commonly distributed documents on its website in the designated citywide languages as well as other additional languages to meet the needs of the service population. OATH has translated documents available at all publicly accessible offices and OATH personnel at the help centers can print translated documents upon request. All OATH decisions are written in English, but translations are available upon request and OATH Hearing Division's decisions include a mailer informing respondents that the decision can be translated into their preferred language.

OATH informs the public of the availability of free language access services by posting signs in conspicuous locations in their publicly accessible offices throughout the City. OATH also posts notices on its website stating that free language access services are available and informs help line callers that language access services are available. Information provided in the prerecorded message when calling (844) OATH-NYC (628-4692) is available in English, Spanish, Mandarin, and Cantonese.

OATH's website contains a translation feature located in the top right corner of the page that translates the website into the designated citywide languages, the two temporary languages as determined by Mayor's Office of Immigrant Affairs (MOIA) per Local Law 13, the 12 most commonly spoken non-English languages in NY State, and the 12 most common parent preferred languages in NYC according to the DOE.

OATH trains staff in accessing and using OATH's contracted languages access service vendors.

³ The four-factor analysis, issued by the U.S. Department of Justice, is required for programs and activities that receive federal funding and is intended to assess the language access needs and resources needed. The four factors consist of the following: (1) number or proportion of NELP persons in the eligible service population; (2) the frequency with which NELP individuals come into contact with the agency; (3) the importance of the benefit, service, information, or encounter to the NELP person; and (4) the resources available to the agency and the costs of providing various types of language services.

⁴ Interpretation is the real-time conversion of spoken or signed communication from one language into another.

⁵ Translation is the process of converting written text from language into another.

Training included how to request and schedule interpretations and translations, best practices for interacting with an interpreter, posing questions to recognize language access needs, ensuring respondents are aware that they are entitled to interpretation during a hearing, and using plain language during hearings. OATH's language access plan accounts for providing training to personnel on OATH's LAIP, using conference phones for interpretation, and plain language decision writing.

Scope and Methodology

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). GAGAS requires that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions within the context of our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, § 93, of the New York City Charter.

The scope period was from January 1, 2018 through October 30, 2025.

To achieve the audit objectives, auditors performed the following:

- Reviewed relevant criteria including:
 - NYC Executive Order No.120 July 22, 2008 (EO120)
 - NYC Administrative Code, Title 23, Chapter 8, City Website § 23-801, Local Law 25 of 2016
 - NYC Administrative Code, Title 23, Chapter 11, Language Access § 23-1101, Local Law 30 of 2017
 - NYC Administrative Code Title 23, Chapter 11, Language Access § 23-1105, Local Law 13 of 2023
 - New York State Executive Law Section 202-A: Language Translation Services
 - New York City Department of Education Chancellor's Regulation A-663
- Created compliance checklists to assess OATH's compliance with Local Law 30.
- Conducted interviews and walkthroughs with key OATH personnel involved with the provision of language access services.
- Reviewed and assessed whether OATH's Language Access Procedures were developed in accordance with Local Law 30, using the required four-factor analysis (the number or proportion of NELP persons in the eligible service population; the frequency with which NELP individuals come into contact with the agency; the importance of the benefit, service, information, or encounter to the NELP person; and the resources available to the agency and the costs of providing various types of language services). Auditors reviewed OATH LAIPs implemented in 2017, 2018, 2021, and 2024.
- Reviewed and assessed whether OATH Language Access Procedures met the criteria as a Language Access Implementation Plan as defined by Local Law 30.
- Tested whether OATH provided direct public services in at least the 10 designated

citywide languages and the two temporary languages as determined by MOIA per Local Law 13 by (1) reviewing OATH's Language Access Implementation Plan; (2) conducting a visit to OATH's location; and (3) conducting interviews with pertinent personnel regarding the provision of language access services.

- Obtained and reviewed documentation and assessed whether OATH identified and translated the agency's most distributed public documents provided to or completed by the public.
- Conducted site visits to five OATH locations (Bronx, Brooklyn, Manhattan, Queens, and Staten Island) between September 25 and September 30, 2025, to observe OATH's interpretation services and ensure equity and inclusion for OATH's NELP clients. Auditors visited OATH Hearing offices and Help Centers in each of the five boroughs. To accomplish this, auditors (1) checked for the required signage and multilingual documents; (2) interviewed pertinent personnel regarding the provision of language access services; and (3) obtained and reviewed the employee manual for language access training and/or written policies and procedures.
- Reviewed OATH signage kits posted in OATH offices to determine whether they contain multilingual posters.
- Reviewed signage kits posted in OATH offices to ensure signs were posted in publicly accessible conspicuous locations.
- Reviewed and assessed whether OATH established an appropriate monitoring and measurement system regarding the provision of agency language services.
- Reviewed and assessed whether OATH created appropriate public awareness strategies for the agency's serviced NELP population by visiting five OATH locations (Bronx, Brooklyn, Manhattan, Queens, and Staten Island) to determine whether the required notification of the right of free interpretation services is posted in conspicuous locations. Auditors observed various OATH documents notifying the public of the right to interpretation such as the posters on the wall and information about the provision of language access services posted on OATH's website.
- Reviewed whether OATH's Language Access Implementation Plan and name and title of the designated Language Access Coordinator are posted to its website.
- Accessed OATH's website and translated the information into the top 10 NYC NELP languages as well as the two temporary languages as determined by MOIA, per Local Law 13.
- Reviewed Mayor's Office of Immigrant Affairs Local Law 13 guidelines explaining the current designation, agency requirements, and best practices for implementation.
- Placed calls to OATH's telephonic helplines at (212) 436-0845 and (844) OATH-NYC (628-4692) and sent a text message to (917) 451-8829 (OATH's text help number).

The objectives of the audit rely on a review of OATH's policies and procedures, its ability to provide interpretation and translation in the top 10 NELP languages spoken in NYC, its website,

its training materials, and its most commonly distributed documents to determine compliance with applicable laws and regulations. Auditors obtained copies of OATH's policies and procedures, contracts with vendors to provide interpretation and translation services, training material, required signage, commonly distributed documents, and records of complaints filed in constituents' preferred language. Auditors determined that they had obtained sufficient evidence on which to base a reasonable conclusion regarding OATH's compliance with relevant laws, standards, and guidelines.

Preliminary results of this audit were discussed with OATH officials on October 16, 2025. OATH agreed to waive the need for an Exit Conference Summary and an Exit Conference. On November 3, 2025, a Draft Audit Letter Report was submitted to OATH with a request for written comments. Our office received a written response from OATH dated November 6, 2025. In its response, OATH agreed with the audit's findings. The full response is attached to this report as an addendum.

Yours sincerely,



Maura Hayes-Chaffe

Enc.

C: Marisa L. Senigo, Deputy Commissioner: Public Affairs and Communications
Ray Kramer, Executive Director: Center for Creative Conflict Resolution, Director of the Administrative Judicial Institute
Maria Marchiano, Deputy Commissioner and Chief Clerk
Jean-Claude LeBec, Director, Mayor's Office of Risk Management and Compliance
Doug Giuliano, Deputy Director, Mayor's Office of Risk Management and Compliance



THE CITY OF NEW YORK
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Asim Rehman
COMMISSIONER &
CHIEF ADMINISTRATIVE LAW JUDGE

November 6, 2025

Maura Hayes-Chaffe
Deputy Comptroller for Audit
Office of the Comptroller
1 Centre Street, Room 1100 North
New York, NY 10007

Re: Audit Report on the New York City Office of Administrative Trials and Hearings'
Provision of Language Services (SZ26-059A)

Dear Ms. Hayes-Chaffe:

The Office of Administrative Trials and Hearings ("OATH") hereby submits its comments to the Draft Audit Letter Report dated November 3, 2025.

OATH accepts the Comptroller's draft report findings in full. OATH would like to thank the audit team for taking the time to audit our compliance with local laws and for meeting with us to understand our processes and procedures regarding the provision of language services. OATH takes seriously its commitment to provide due process to New Yorkers who are summoned to, or otherwise interact with, this court, and we are proud of the work we have done to institutionalize our language accessibility. OATH recognizes that true due process is only accomplished when everyone who appears at OATH, irrespective of their personal language needs or preferences, has full and equal access to the information and assistance needed to meaningfully participate in the administrative hearing process.

Sincerely,

A handwritten signature in blue ink, appearing to be "Asim Rehman".

Asim Rehman
Commissioner & Chief Administrative Law Judge

c: Maria L. Marchiano, Deputy Commissioner, Chief Clerk
Marisa L. Senigo, Deputy Commissioner, Public Affairs and Communications