



CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
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MAURA HAYES-CHAFFE  
DEPUTY COMPTROLLER FOR  
AUDIT

BUREAU OF AUDIT

May 25, 2022

**By Electronic Mail**

Annabel Palma  
Chair and Commissioner  
New York City Commission on Human Rights  
22 Reade Street  
New York, NY 10007

**Re: Final Audit Letter Report on the Compliance of the New York City Commission on Human Rights with Local Law 25 of 2016 Regarding Website Translations (Audit #SZ22-066AL)**

Dear Commissioner Palma:

This Final Audit Letter Report concerns the New York City Comptroller's audit of the New York City Commission on Human Rights' (CCHR's) compliance with Local Law 25, which governs the translation of websites of New York City (City) agencies. Local Law 25 is intended to make City agencies, and ultimately the City as a whole, more accessible to foreign-born residents whose primary language is not English. This audit of CCHR is one in a series of audits the Comptroller's Office is conducting on the City's compliance with Local Law 25.

**Background**

New York City, with a population of more than 8 million people, is home to one of the most diverse populations in the world, with more than 3 million foreign-born residents from more than 200 countries. 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 percent of City residents aged five and over are not proficient in English. For residents with limited English proficiency (LEP), interacting with City government and receiving access to City services can be a challenge.

Most City agencies have a significant presence on the internet and rely on agency websites to both provide information to and interact with the public. In 2016, Local Law 25 was signed into law, requiring that every website maintained by or on behalf of a City agency includes a translation service enabling users to view the text of that website, wherever practicable, in languages other than English.<sup>1</sup>

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<sup>1</sup> Local Law 25 of 2016 also requires that the translation feature be identifiable in a manner that is comprehensible to

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In 2017, the New York City Council enacted Local Law 30, effective July 1, 2017, which requires City agencies that provide direct public services or emergency services to have a Language Access Plan that allows residents meaningful access to City services regardless of their proficiency in English. These translation services must be provided in the top 10 designated Citywide languages, which are: Spanish, Chinese (includes Cantonese and Mandarin), Russian, Haitian/French Créole, Bengali, Korean, Arabic, Urdu, French, and Polish.

CCHR is the agency responsible for enforcing the New York City Human Rights Law (City Human Rights Law), educating the public about their rights and responsibilities under the law, and encouraging positive community relations.<sup>2</sup> CCHR is divided into two major bureaus: Law Enforcement and Community Relations. The Law Enforcement Bureau is responsible for the intake, investigation, and prosecution of complaints alleging violations of the City Human Rights Law, while the Community Relations Bureau works to provide public education about the City Human Rights Law and to help cultivate understanding and respect among the City's many diverse communities through its borough-based Community Service Centers and numerous educational and outreach programs.

The objective of this audit was to determine whether CCHR is complying with Local Law 25, which is intended to make City agencies' services more accessible to immigrants and non-English speakers through translations of their websites.

### **Findings and Recommendation**

The auditors found that CCHR complied with Local Law 25. CCHR's website includes a translation feature at the top of the page for viewing text and essential information of the website in various languages, including the top 10 designated NYC LEP languages. Specifically, the translation feature provides users with LEP adequate access to the pertinent information provided on CCHR's website including CCHR's services/programs, the Community Relations Bureau and the Law Enforcement Bureau, its Community Service Center locations, contact information, getting help, workshops/events, scheduling appointments, the City Human Rights Law, reporting discrimination, and the discrimination complaint and mediation process.

The auditors recommend that CCHR continue to maintain its compliance with Local Law 25 to ensure that it effectively meets the needs of residents with limited English proficiency who access City services online.

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speakers of the seven most commonly spoken languages in the City. However, Local Law 30 of 2017 effectively increased the required number of languages to 10.

<sup>2</sup> The City Human Rights Law prohibits discrimination in employment, housing, and public accommodations based on race, color, religion/creed, age, national origin, immigration or citizenship status, gender (including sexual harassment), gender identity, sexual orientation, disability, pregnancy, marital status, and partnership status among other protections.

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**CCHR's Response:** "The Commission agrees with the audit's recommendation, and to continue to maintain its compliance with Local Law 25 to ensure that it effectively meets the needs of residents with limited English proficiency who access its services online."

## Scope and Methodology

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require 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 based on 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 for this audit was August 9, 2021 through March 4, 2022. The methodology for this audit consisted of the following steps; specifically, the auditors:

- Reviewed applicable laws, rules, policies, and procedures to determine their criteria in accordance with Local Law 25 of 2016.
- Researched and determined the 10 designated Citywide languages in the City among residents with limited English proficiency, as determined by the Department of City Planning, the Mayor's Office of Language Services Coordinator, and data collected by the Department of Education as required by Local Laws 25 and 30.
- Reviewed and analyzed CCHR's website and tested its ability to translate into the top 10 most commonly spoken languages for residents with limited English proficiency.
- Reviewed and analyzed CCHR's initial Language Access Plan issued pursuant to Executive Order 120 of 2008,<sup>3</sup> and Language Access Plans issued 2018 and 2021 to determine what steps CCHR took to comply with Local Law 25.
- Reviewed and analyzed CCHR's website to determine whether CCHR's essential documents could be downloaded on the website, and tested whether they translate to the 10 most commonly spoken languages for residents with limited English proficiency.

The matters covered in this letter report were discussed with CCHR officials during and at the conclusion of the audit, and they agreed that a preliminary draft letter report and an exit conference were not necessary. On April 8, 2022, we submitted a draft letter report to CCHR officials with a request for comments. We received a written response from CCHR on April

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<sup>3</sup> CCHR's initial Language Access Plan was designated under Executive Order 120 of 2008. Local Law 30 of 2017 expands the requirements of Executive Order 120, specifically the number of designated languages.

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20, 2022. In its response, CCHR agreed with the audit's findings and recommendation, stating, "We appreciate the acknowledgement of the Commission's efforts to provide meaningful language access to the agency's services for New Yorkers with limited English proficiency."

The full text of CCHR's response is included as an addendum to this report.

Sincerely,

DocuSigned by:



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Maura Hayes-Chaffe

cc: Damion Stodola, General Counsel, CCHR

David Rozen, Deputy General Counsel, CCHR

JoAnn Kamuf Ward, Deputy Commissioner for Policy and External Affairs, CCHR

Daniel Steinberg, Director, Mayor's Office of Operations

Doug Giuliano, Associate Director, Programs, Mayor's Office of Operations

April 20, 2022

Maura Hayes-Chaffe  
Deputy Comptroller for Audit  
Office of the Comptroller, Bureau of Audit  
David N. Dinkins Municipal Building  
One Centre Street  
New York, New York 10007

Re: Draft Audit Letter Report on the New York City Commission on Human Rights' Compliance with Local Law 25 of 2016 Regarding Translation of Agency Website (Audit #SZ22-066AL)

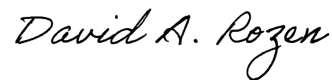
Dear Deputy Comptroller Hayes-Chaffe:

Thank you for the opportunity to respond to the draft audit letter report dated April 8, 2022, which confirmed the Commission's compliance with Local Law 25 of 2016.

We appreciate the acknowledgement of the Commission's efforts to provide meaningful language access to the agency's services for New Yorkers with limited English proficiency. The Commission agrees with the audit's recommendation, and to continue to maintain its compliance with Local Law 25 to ensure that it effectively meets the needs of residents with limited English proficiency who access its services online.

If you require further information, please contact me at (212) 416-0135.

Best,

A handwritten signature in black ink that reads "David A. Rozen".

David A. Rozen  
Deputy General Counsel