



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

MARJORIE LANDA  
DEPUTY COMPTROLLER FOR  
AUDIT

BUREAU OF AUDIT

May 30, 2017

**By Electronic Mail**

Commissioner Bill Chong  
New York City Department of Youth & Community Development  
156 William Street, 6<sup>th</sup> Floor  
New York, NY 10038

**Re: Final Letter Report on the New York City Department of Youth and  
Community Development's Compliance with Local Law 25 Regarding  
Translation of Agency Websites (Audit Number SZ17-130AL)**

Dear Commissioner Chong:

This Final Letter Report concerns the New York City Comptroller's audit of the New York City Department of Youth and Community Development's (DYCD's) compliance with Local Law 25, which governs the translation of websites of New York City agencies. The objective of this audit was to determine whether DYCD is in compliance with Local Law 25, which 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. Our audit found that DYCD generally complies with Local Law 25. This audit is one in a series of audits we are conducting of City agencies' compliance with Local Law 25.

**Background**

New York City, with a population of more than 8.5 million people, is home to one of the most diverse populations in the world, with more than 3.2 million foreign-born residents from more than 200 countries.<sup>1</sup> 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 age five and over, or 1.8 million persons, are not proficient in English.<sup>2</sup> For residents with limited English proficiency, interacting with City government and receiving access to City services can be a challenge.

---

<sup>1</sup> NYC Department of City Planning (DCP), *New York City Population*, <http://www1.nyc.gov/site/planning/data-maps/nyc-population/population-facts.page>, downloaded April 19, 2017; DCP, *NYC's Foreign-born, 2000 to 2015*, March 2017, <https://www1.nyc.gov/assets/planning/download/pdf/about/dcp-priorities/data-expertise/nyc-foreign-born-info-brief.pdf?r=2>, downloaded April 12, 2017; DCP, *Limited English Proficient Population*, <https://www1.nyc.gov/site/planning/about/language-access.page>, downloaded April 12, 2017.

<sup>2</sup> DCP, *Limited English Proficient Population*, *op. cit.*

Most City agencies have a significant presence on the internet and they rely on agency websites to provide information and interact with the public. Accordingly, in 2016, Mayor de Blasio signed Local Law 25, amending the City's Administrative Code in relation to citizens' ability to access translation of City websites. Local Law 25 requires that every website maintained by or on behalf of a City agency include a translation service enabling users to view the text of that website, wherever practicable, in languages other than English. It also requires that the translation service be identifiable in a manner that is comprehensible to speakers of the seven most commonly spoken languages in the city. As determined by the Department of City Planning, the seven most commonly spoken languages in New York City amongst residents with limited English proficiency are:

- 1) Spanish
- 2) Chinese (includes Cantonese, Mandarin, and Formosan)
- 3) Russian
- 4) Bengali
- 5) French Créole (also called Haitian Créole)
- 6) Korean
- 7) Arabic<sup>3</sup>

## **Findings and Recommendations**

Our audit found that DYCD generally complies with Local Law 25. DYCD's website, found at <http://www1.nyc.gov/site/dycd/index.page>, includes a translation feature for viewing text and essential information in various languages, including the top seven languages spoken by residents with limited English proficiency.

DYCD's website also provides information on its efforts in youth and community development including the agency's Youth Connect, which is a web-based platform that serves as a resource and referral service. Youth Connect's mission is to increase access to and visibility of opportunities for young people by serving as a one-stop shop for all youth-related resources in New York City. In addition, DYCD's website provides information on how residents can participate in community efforts through Community Action Boards or Neighborhood Advisory Boards. All information can be translated and viewed in the top seven noted languages.

DYCD defines its essential public documents as agency brochures, standardized program applications distributed by DYCD, enrollment forms and consent forms.<sup>4</sup> Two forms were provided on the website: the "Transportation Application" and the "Helping Hand" brochure. Both of these forms could be translated into the top seven noted languages.

---

<sup>3</sup> According to the DCP report, issued in February 2017, entitled *Top Languages Spoken at Home by Limited English Proficiency (LEP) Universe: Population 5 Years and Over*.

<sup>4</sup> The City agency determines which documents are key, essential, frequently used and translated on its website.

Our findings are outlined in the table entitled Compliance Summary below.

<b>COMPLIANCE SUMMARY</b>		
<b>Local Law 25 Criteria</b>	<b>Compliance</b>	<b>Notes</b>
Translation feature for viewing text in the top seven most commonly spoken languages of residents with limited English proficiency  (As required by Local Law 25)	Yes	DYCD's website enables translation into various languages including all seven required languages. DYCD's website provides an extensive range of information on its development efforts and programs. All information can be translated and accessed in the seven required languages.
Key documents translate into the top seven most commonly spoken languages of residents with limited English proficiency  (As prescribed by DYCD standards)	Yes	We successfully translated DYCD's "Transportation Application" and "Helping Hand" brochures into all seven required languages.

We recommend that DYCD continue to maintain its compliance with Local Law 25 to ensure it effectively meets the needs of residents with limited English proficiency when accessing city 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 November 14, 2016 to May 12, 2017, the last day of our fieldwork. Our methodology for this audit consisted of the following steps:

- We reviewed applicable laws, rules, policies and procedures to determine our criteria in accordance with Local Law 25.
- We researched and determined the seven most commonly spoken languages in the City among residents with limited English proficiency, as determined by the Department of City Planning.

- We reviewed and analyzed DYCD’s website and tested its ability to translate into the top seven most commonly spoken languages for residents with limited English proficiency.
- We reviewed and analyzed DYCD’s August 2015 Language Access Plan to determine what steps DYCD took to comply with Local Law 25.<sup>5</sup>
- We reviewed the Language Access Plan to determine which documents DYCD deemed essential for the agency to provide direct public services and that needed to be translated.
- We reviewed and analyzed whether DYCD’s essential documents and forms could be downloaded on the website, and tested whether they translate to the seven most commonly spoken languages for residents with limited English proficiency.
- We conducted interviews with DYCD’s staff members to discuss the agency’s website efforts and verify its compliance with Local Law 25.

Based on our understanding of the Local Law 25 requirements, we outlined all the criteria necessary for agencies to be in compliance. The table below outlines agencies’ core criteria required to achieve compliance under Local Law 25. A summary of these core criteria forms the basis for the compliance summary reported for each audited agency.

<b>CORE CRITERIA</b>	
<b>Compliance</b>	<b>Detailed Criteria</b>
<b>Spanish</b>	Agency’s website includes a translation feature for viewing text, essential information and key documents in Spanish
<b>Chinese</b>	Agency’s website includes a translation feature for viewing text, essential information and key documents in Chinese
<b>Russian</b>	Agency’s website includes a translation feature for viewing text, essential information and key documents in Russian
<b>Bengali</b>	Agency’s website includes a translation feature for viewing text, essential information and key documents in Bengali
<b>French Créole (Haitian Créole)</b>	Agency’s website includes a translation feature for viewing text, essential information and key documents in French Créole/Haitian Créole
<b>Korean</b>	Agency’s website includes a translation feature for viewing text, essential information and key documents in Korean
<b>Arabic</b>	Agency’s website includes a translation feature for viewing text, essential information and key documents in Arabic

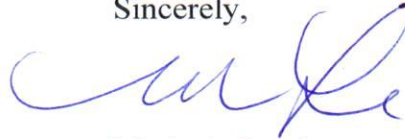
<sup>5</sup> DYCD’s August 2015 Language Access Plan is the most current plan available from the agency or the website. Each agency is required to develop a Language Access Plan, using a four-factor analysis based on guidance issued by the U.S. Department of Justice. These issues include: the number or proportion of LEP persons in the eligible service population; the frequency with which LEP individuals come in contact with the agency; the importance of the benefit, service, information, or encounter to the LEP person; and the resources available to the agency and the costs of providing various types of language services.

The issues covered in this report were discussed with DYCD officials during and at the conclusion of this audit and DYCD officials agreed no exit conference was necessary. On May 18, 2017, we submitted a draft report and provided DYCD with the opportunity to formally respond in writing. DYCD's written response was received on May 24, 2017. In it, DYCD agreed with the report's findings and stated,

[t]he Department of Youth and Community Development (DYCD) is pleased to acknowledge the conclusions of the Draft Letter Report that 'DYCD generally complies with Local Law 25' by maintaining a website, which 'includes a translation feature for viewing text and essential information in various languages, including the top seven languages spoken by residents with limited English proficiency' and . . . DYCD agrees with the sole Recommendation that it should continue to maintain its compliance with Local Law 25 to ensure that it effectively meets the needs of residents with limited English proficiency when accessing city services online.

The full text of DYCD's comments is included as an addendum to this report .

Sincerely,



Marjorie Landa

- c: William M. Kamen, Senior Director of Internal Review, Assistant General Counsel
- John Cirolia, Deputy Commissioner for Administration
- Alan Cheng, Associate Commissioner, Bureau of Budget & Finance
- Mindy Tarlow, Director, Mayor's Office of Operations
- George Davis, III, Deputy Director, Mayor's Office of Operations

2 Lafayette Street  
19<sup>th</sup> Floor  
New York, NY 10007

May 24, 2017

646 343 6710 tel  
646 343 6973 fax

[www.nyc.gov/dycd](http://www.nyc.gov/dycd)

Ms. Marjorie Landa  
Deputy Comptroller for Audit  
Office of the Comptroller  
One Centre Street, Room 1100 North  
New York, New York 10007

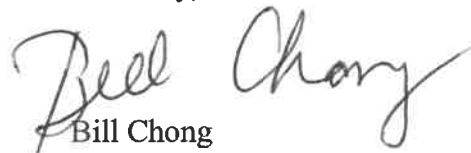
**Re: Draft Letter Report on the Department of Youth and Community Development's Compliance with Local Law 25 Regarding Translation of Agency Websites SZ17-130AL (Draft Report)**

Dear Ms. Landa:

The Department of Youth and Community Development (DYCD) appreciates this opportunity to review and provide the attached response to the Draft Report. It is respectfully requested that the response be attached as part of the Final Report.

If you have questions regarding the response, please do not hesitate to contact me.

Sincerely,

  
Bill Chong

c: Mindy Tarlow, Director, Mayor's Office of Operations  
George Davis, III, Deputy Director, Mayor's Office of Operations  
John Cirolia, Deputy Commissioner, DYCD  
Alan Cheng, Associate Commissioner, DYCD  
William M. Kamen, Senior Director of Internal Review, DYCD

**RESPONSE TO THE DRAFT LETTER REPORT  
ON THE  
DEPARTMENT OF YOUTH AND COMMUNITY DEVELOPMENT'S  
COMPLIANCE WITH LOCAL LAW 25  
GOVERNING TRANSLATION OF AGENCY WEBSITES  
AUDIT NUMBER SZ17-130AL (DRAFT LETTER REPORT)**

The Department of Youth and Community Development (DYCD) is pleased to acknowledge the conclusions of the Draft Letter Report that “DYCD generally complies with Local Law 25” by maintaining a website, which “includes a translation feature for viewing text and essential information in various languages, including the top seven languages spoken by residents with limited English proficiency” and:

- DYCD’s website provides an extensive range of information on its development efforts and programs
- information can be translated in Spanish, Chinese, Russian, Bengali, French Creole (Haitian Creole), Korean and Arabic
- DYCD meets each of the Local Law 25 Criteria for translation including key documents such as DYCD’s “Transportation Application” and “Helping Hand” brochures.

DYCD agrees with the sole Recommendation that it should continue to maintain its compliance with Local Law 25 to ensure that it effectively meets the needs of residents with limited English proficiency when accessing city services online.