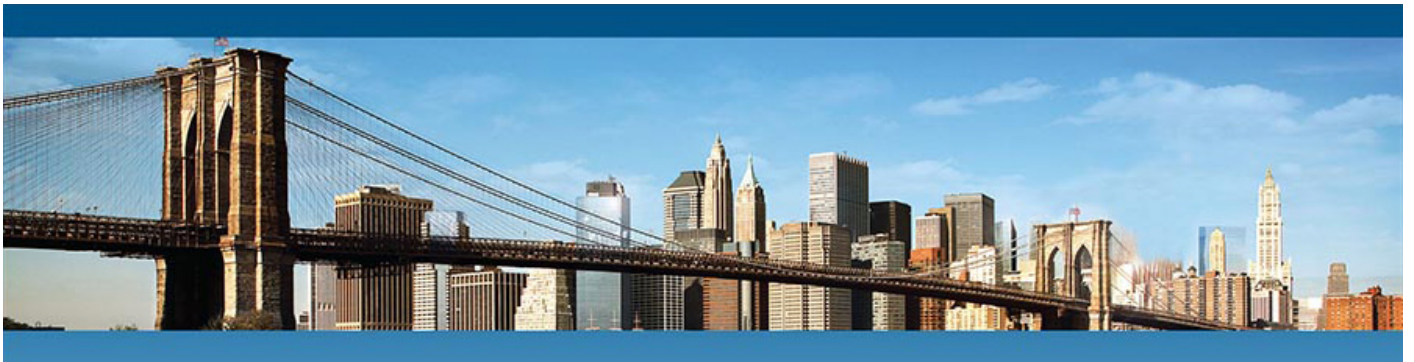


City of New York

OFFICE OF THE COMPTROLLER

Scott M. Stringer
COMPTROLLER



AUDITS & SPECIAL REPORTS

Marjorie Landa

Deputy Comptroller for Audit

Audit Report on the Compliance of the
New York City Department of Buildings
with Local Law 30 Regarding Access to
City Services for Residents with Limited
English Proficiency

SZ18-130A

May 21, 2019

<http://comptroller.nyc.gov>



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

May 21, 2019

To the Residents of the City of New York:

My office has audited the New York City Department of Buildings (DOB) to determine whether DOB is in compliance with Local Law 30, which requires that City agencies providing direct or emergency services to the public create a language access implementation plan and to ensure meaningful language access to their services. 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. For residents with limited English proficiency, interacting with City government can often be a challenge. We audit City agencies such as DOB to help ensure that they are complying with applicable laws and regulations and that they are providing residents access to important City services.

The audit found that DOB generally complied with Local Law 30. Our review of DOB's Language Access Plans dated 2009 and 2018 found that DOB has made continuous progress to provide meaningful language access to the agency's services for Limited English Proficient (LEP) customers. Its Language Access Plans describe the steps that DOB has taken to provide its services to the LEP population. Overall, we found that DOB provides direct public services in the top 10 New York City LEP languages as required by Local Law 30. Further, we found that through City-wide contracts with language vendors (Language Line Services, LLC, and Geneva Worldwide, Inc.), DOB has the ability to provide documentation, translation, and phone interpretation services in a minimum of 170 languages.

The report recommends that DOB should: (1) continue to adhere to Local Law 30 to ensure that it adequately meets the language needs of the communities it serves; and (2) ensure that all documents that it deems essential are translated in the top 10 LEP languages as required.

The results of the audit have been discussed with DOB officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report.

If you have any questions concerning this report, please e-mail my Audit Bureau at audit@comptroller.nyc.gov.

Sincerely,

A handwritten signature in blue ink that reads "Scott M. Stringer".

Scott M. Stringer

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THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER AUDITS & SPECIAL REPORTS

Audit Report on the Compliance of the New York City Department of Buildings with Local Law 30 Regarding Access to City Services for Residents with Limited English Proficiency

SZ18-130A

EXECUTIVE SUMMARY

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 includes the top 6 limited English proficiency languages spoken by the population of New York City as determined by the Department of City Planning and the Mayor's Office of Language Services Coordinator, based on U.S. census data, and the top 4 limited English proficiency languages spoken by the population served or likely to be served by the agencies of the City of New York, excluding the languages designated for translation based on U.S. census data.

This audit focuses on whether New York City Department of Buildings (DOB) complied with Local Law 30. DOB's mission is to ensure the safe and lawful use of more than 900,000 buildings and properties by enforcing the Building Code, Zoning Resolution, and other applicable laws. Annually, DOB reviews over 60,000 construction plans, issues over 110,000 new and renewed permits, performs over 300,000 inspections, and issues 12 types of licenses, registrations, and certificates. DOB architects and engineers evaluate construction plans, verifying that they meet Building Code and zoning requirements. Inspectors monitor job sites to enforce Building Code and zoning regulations and issue violations when appropriate. DOB issues a Certificate of Occupancy (C of O), which documents the legal use or occupancy of a building when the required sign-offs are obtained.

Audit Findings and Conclusion

We found that DOB generally complied with Local Law 30. Our review of DOB's Language Access Plans dated 2009 and 2018 found that DOB has made continuous progress to provide meaningful language access to the agency's services for Limited English Proficient (LEP) customers. Its

Language Access Plans describe the steps that DOB has taken to provide its services to the LEP population.

Overall, we found that DOB provides direct public services in the top 10 New York City LEP languages as required by Local Law 30. Further, we found that through City-wide contracts with language vendors (Language Line Services LLC., and Geneva Worldwide Inc.), DOB has the ability to provide documentation, translation, and phone interpretation services in a minimum of 170 languages. Appendices I and II contain details of the specific items we tested and the results of our tests. Appendix III illustrates DOB's efforts to ensure Local Law 30 compliance.

Agency Response

In its response, DOB agreed with the audit's findings and recommendations.

AUDIT REPORT

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. 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. For residents with limited English proficiency, interacting with City government can often be a challenge.¹

Local Law 73 was enacted in 2003 to enhance the ability of City LEP residents to interact with City government and, more specifically, to obtain needed social services. The law applies to four social service agencies: the Human Resources Administration; the Department of Homeless Services; the Administration for Children's Services; and the Department of Health and Mental Hygiene. It requires that free language assistance services be provided for clients when they seek to obtain services at any of these agencies, as well as job centers and food stamp offices. In July 2008, Mayor Michael Bloomberg signed Executive Order 120 (EO 120), which requires all City agencies to provide opportunities for limited English speakers to communicate with City agencies and receive public services.

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 10 top designated City-wide languages, consisting of (1) the top 6 LEP languages spoken by the population of New York City as determined by the Department of City Planning and the Mayor's Office of the Language Services Coordinator, based on U.S. census data; and (2) the top 4 LEP languages spoken by the population served or likely to be served by the agencies of the City of New York as determined by the Mayor's Office of the Language Services Coordinator, based on language access data collected by the City Department of Education, excluding the languages designated based on U.S. census data.

Specifically, Local Law 30 requires each agency to:

- Designate a Language Access Coordinator to oversee the creation and execution of an agency-specific internal language access policy and implementation plan.
- Develop such a plan using a four-factor analysis based on guidance issued by the U.S. Department of Justice including: the number or proportion of LEP persons in the eligible service population; the frequency with which LEP individuals come into 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.

¹ Mayor's Office of Immigrant Affairs, "State of Our Immigrant City" annual report, March 2018; New York City Department of City Planning <https://www1.nyc.gov/site/planning/about/language-access.page>

- Provide services in languages based on the top 10 LEP languages spoken by the population of New York City. These languages are determined by the Department of City Planning and the Mayor's Office of the Language Services Coordinator, based on (1) United States Census data, as to 6 languages, and (2) data collected by the Department of Education, as to 4 languages, as those languages are relevant to the services offered by each agency. The designated top 10 LEP languages spoken by the population in New York City are Spanish, Chinese (Mandarin, Cantonese, Taiwanese and Formosan), Russian, Haitian/French Creole, Bengali, Korean, Arabic, Urdu, French, and Polish.²
- Ensure that the language access policy and implementation plan includes: identification and translation of the most commonly distributed public documents; interpretive services, including telephone interpretation for the top six languages and others as appropriate; 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.
- Incorporate consideration of language access in agency communications such as emergency notifications, public hearings and events; and incorporate plain language principles for documents most commonly distributed to the public that contain important or necessary information.
- Update the Language Access Plan based on changes in the agency's service population or services at least every three years and publish the plan on the agency website.

Local Law 30 references the New York City Charter's requirement that the Mayor's Office of Operations (Operations) coordinate the provision of language services to the public and provide technical assistance to City agencies providing such services. In addition, the Mayor's Office of Immigrant Affairs is responsible for promoting immigrants' access to City services, by developing appropriate policies and outreach programs to educate immigrants and foreign language speakers about such services.

We are conducting a series of audits of City agencies' compliance with Local Law 30. We have created a compliance checklist and designed audit tests to be performed to facilitate uniformity in our reporting to the extent reasonably possible. The checklist and testing criteria, with results for this audit, are presented in Appendix I and II.

This audit focuses on whether DOB complied with Local Law 30. DOB's mission is to ensure the safe and lawful use of more than 900,000 buildings and properties by enforcing the Building Code, Zoning Resolution, and other applicable laws. Annually, DOB reviews over 60,000 construction plans, issues over 110,000 new and renew permits, performs over 300,000 inspections, and issues 12 types of licenses and registrations and certificates. DOB architects and engineers evaluate construction plans, verifying that they meet Building Code and zoning requirements. Inspectors monitor job sites to enforce Building Code and zoning

² The New York City Department of City Planning designated these as the top 10 languages, https://www1.nyc.gov/assets/planning/download/pdf/about/language-access/lap_dcp.pdf?r=0818. As defined by the Mayor's Office of Immigrant Affairs, MOIA Annual Report-March 2018 page 25, Guidance on City Legislation.

regulations and issue violations when appropriate. DOB issues a C of O, which documents the legal use or occupancy of a building when the required sign-offs are obtained.

Objective

The objective of the audit was to determine whether DOB is in compliance with Local Law 30, which requires that City agencies providing direct or emergency services to the public create a language access implementation plan and to ensure meaningful language access to their services.

Scope and Methodology Statement

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.

To achieve our audit objective, we reviewed DOB Language Access Plans dated 2009 and 2018 and other pertinent documents, interviewed key DOB personnel, and conducted site visits at DOB's five borough offices where direct public services are located. Our scope period is from May 1, 2018 through April 12, 2019. Please refer to the detailed scope and methodology at the end of this report for the specific procedures and tests that were conducted.

Discussion of Audit Results

The matters covered in this report were discussed with DOB officials during and at the conclusion of this audit. DOB officials were notified of our findings during the course of the audit and agreed that an exit conference was not necessary. On May 1, 2019, we submitted a draft report to DOB with a request for comments. We received a written response from DOB on May 14, 2019. In its response, DOB agreed with the audit and stated:

Thank you for giving us the opportunity to respond to the recommendation in the above referenced audit report. We view your input as assistance in furthering our commitment to provide all of our customers with meaningful access to our services.

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

FINDING AND RECOMMENDATION

We found that DOB generally complied with Local Law 30. Our review of DOB's Language Access Plans dated 2009 and 2018 found that DOB has made continuous progress to provide meaningful language access to the agency's services for LEP customers. Its Language Access Plans describe the steps that DOB has taken to provide its services to the LEP population.

DOB provides direct public services at its five borough offices during the hours of operation of 8:30 a.m. to 4:00 p.m. We found that at its borough offices, DOB offered free interpretation services online, by telephone, or in person for communications concerning public and worker safety. In addition, tenant and worker rights brochures were translated into the top 10 languages. DOB's major customer population that obtains permits and provides designs, consists primarily of architects and engineers. Based on DOB's reported level of utilization of the language vendors, DOB has determined that its LEP customer service population for such permits and design-submissions encompasses less than one percent of the individuals who require DOB services.

DOB has conducted several campaigns in the top 10 New York City LEP languages directed at LEP construction workers to emphasize the importance of using proper protection including harnesses and scaffold tips. We found that clerks working in the five borough offices' waiting rooms and high traffic areas are available to respond to questions from the public in person or by phone and that the staff were trained on the use of the telephonic services, Language Line Services, LLC, to communicate with the LEP population that called or visited the offices. In addition, DOB staff were able to use Geneva Worldwide Inc., to prepare translations of written documentation. We found that DOB also has an interactive voice response telephone system that provides information to the public in 20 different languages.

In addition, we found that DOB has focused on activities that directly impact public safety and has deemed several documents to be essential such as: *AEU-2 Certificate of Correction*, *LS-4 No Access Notice*, *Stop Work Order*, *Vacate Order* and *Notice of Violation*. According to DOB officials, these documents are in the process of being translated into the top 10 LEP languages. DOB is redesigning documents to a format that is compatible with the translation tools on its website for licensees and registrants. It faces a July 1, 2020 deadline for completing this process under Local Law 30.

Overall, we found that DOB provides direct public services in the top 10 New York City LEP languages as required by Local Law 30. Further, we found that through City-wide contracts with language vendors (Language Line Services LLC., and Geneva Worldwide Inc.), DOB has the ability to provide documentation, translation, and phone interpretation services in a minimum of 170 languages. Appendices I and II contain details of the specific items we tested and the results of our tests. Appendix III illustrates DOB's efforts to ensure Local Law 30 compliance.

Recommendations

1. DOB should continue to adhere to Local Law 30 to ensure that it adequately meets the language needs of the communities it serves.

Agency response: "The Department of Buildings agrees with your recommendation, and we are pleased that your audit determined that we are in compliance with Local Law 30, and will continue to maintain its compliance."

2. DOB should ensure that all documents that it deems essential are translated in the top 10 LEP languages as required.

Agency response: “The Department of Buildings agrees with your recommendation, and will continue to maintain its compliance, and as noted in the audit, we have identified essential documents that are in the process of being translated.”

DETAILED 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.

We are conducting a series of audits of City agencies' compliance with Local Law 30. To ensure uniformity in reporting on these audits, we have created a format that lists the specific tests conducted as it relates to the methodology. Please see Appendix I and II for details.

We reviewed the two DOB Language Access Policy and Implementation Plans issued in 2009 and 2018, reviewed other pertinent documents, and interviewed key DOB personnel.

To achieve our objectives, we performed the following:

- Reviewed EO 120 and Local Law 30;
- Created compliance checklists to assess DOB's compliance with Local Law 30;³
- Conducted interviews with DOB's designated Language Access Coordinator and other staff members;
- Reviewed and assessed whether DOB's language assistance plan was developed in accordance with Local Law 30, using the required four-factor analysis;
- Tested whether DOB provided direct public services in at least the top 10 LEP languages spoken by the New York City population;⁴
- Obtained and reviewed documentation and assessed whether DOB identified and translated most commonly distributed public documents provided to or completed by the public;
- Tested whether interpretation services, including the use of telephonic interpretation services, are available. We made anonymous phone calls to DOB's main public access line to determine whether it could provide telephonic interpreter services in the top 10 LEP languages;
- Obtained and reviewed the employee manual for language access training and/or written policies and procedures;
- Observed DOB signage kits to determine whether they contained multilingual posters;
- Assessed whether DOB established an appropriate monitoring and measurement system regarding the provision of agency language services;
- Assessed whether DOB created appropriate public awareness strategies for the agency's customer service LEP population;
- Reviewed whether DOB's Language Access Plan is posted to its website; and

³ See Appendix I for the completed check list created in connection with this audit.

⁴ See Appendix II for further descriptions of the tests we conducted.

- Accessed DOB's website and translated the information into the top 10 languages spoken in New York City.

LEP COMPLIANCE CHECKLIST

Question	Auditor's Assessment	Auditor's Comments
1. Does DOB provide direct public services or emergency services?	Yes	DOB provides direct public services Citywide.
2. Does DOB have a Language Access Policy and Implementation Plan, and when was it instituted?	Yes	DOB's original Language Access Plan (2009) was based upon EO 120, the predecessor to Local Law 30. DOB's current Language Access Plan 2018 was developed by DOB and approved by the Mayor's Office of Immigrant Affairs in June 2018. This plan is currently posted on DOB's website.
3. Does DOB have a Language Access Coordinator?	Yes	DOB's Director of Customer Service is the designated Language Access Coordinator.
4. Did the Language Access Coordinator oversee the creation of the Language Access Policy and Implementation Plan?	Yes	The Language Access Plan was revised and updated by the current coordinator. Local Law 30 of 2018 requires that each agency update its Language Access Plan, based upon the changes in the agency's service population or services at least every three years. The Language Access Coordinator stated that DOB will revise and update the plan when necessary. DOB will create an annual report in 2019. The Language Access Plan is current as of September 2018.
5. Did the Language Access Coordinator oversee the execution of the Language Access Policy and Implementation Plan?	Yes	DOB's language coordinator oversees the execution of the Language Access Plan.
6. Does the Language Access Coordinator monitor the Language Access Policy and Implementation Plan?	Yes	DOB's language coordinator monitors the progress of the Language Access Plan.
7. Did DOB develop the plan using the four-factor analysis?	Yes	DOB's 2018 Language Access Plan was developed using the four-factor analysis and the language needs most often used by affected population. For Factors 1 through 3, DOB determined the number of LEP customers identified based upon data obtained from 311 and the internal survey of its customers. DOB's assessment was that less than one percent (1 percent) of the customers who had visited or contacted the DOB were LEP. In addition, DOB used information from City Planning. Based on the cost benefit of providing services to its limited LEP population, DOB determined that only

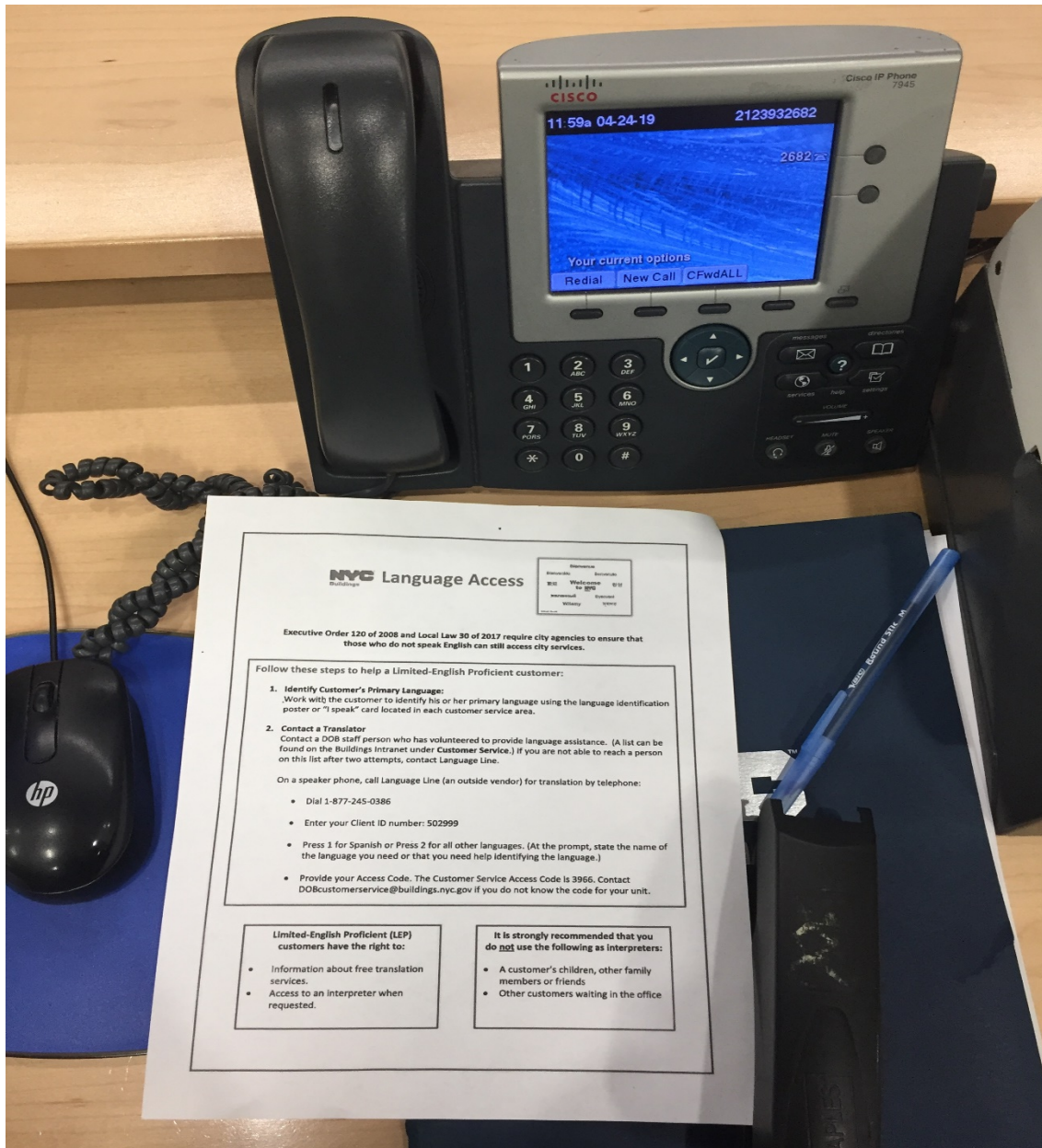
		<p>essential documents that directly impacted public safety would be translated into the required languages. For Factor 4, DOB contracted with the current Citywide vendor Language Line Services, LLC for telephone interpretations, and Geneva Worldwide, Inc. for written documentation. In addition, DOB uses data from the New York City Department of City Planning and the Mayor’s Office of Immigrant Affairs to ensure that the four-factor analysis is properly utilized.</p>
<p>8. Does DOB provide services in languages based on at least the top 10 NYC LEP languages?</p>	<p>Yes</p>	<p>Pursuant to DOB’s Language Access Plan, DOB provides services in 10 LEP languages, which includes the top 10 NYC languages, as required by Local Law 30. DOB maintains contracts with several language-services vendors (including Language Line Services, LLC and Geneva Worldwide, Inc.) and has the ability to provide document translation and phone interpretation services in more than 170 languages as required by Local Law 30. Moreover, DOB also uses the services of 311, which has telephonic capability for 175 languages.⁵</p>
<p>9. Does DOB identify and translate their “most commonly distributed public documents?”</p>	<p>Yes</p>	<p>DOB’s Language Access Plan identifies its essential documents for public safety that DOB has determined should be translated into the top 10 LEP languages as required. The following are examples of DOB’s essential documents that DOB will translate: <i>AEU-2 Certificate of Correction, LS-4 No Access Notice, Stop Work Order, Vacate Order and Notice of Violation</i>. Other documents that we found to be translated in the top 10 LEP were related to public and worker safety such as: <i>Certificate of Occupancy, Site Safety Training, and Tenant Resources</i>. We translated those documents into the top 10 LEP languages.</p>
<p>10. Does DOB provide interpretation services (including telephonic interpretation) for the top 10 LEP languages and others as appropriate?</p>	<p>Yes</p>	<p>Through the Citywide contract with Language Line Services, LLC, DOB is able to provide interpretation services in over 170 languages, including the top 10 LEP Languages. DOB also contracts with Geneva Worldwide, Inc. to provide written transcription services. In addition, DOB uses translators from 311 which enables them to provide translation into 175 languages.</p>

11. Does DOB train its frontline workers and managers on language access policies and procedures?	Yes	DOB updated its training manual and procedures in June 2018, and employees received the training as required by Local Law 30. Training material and the agency's policies and procedures are available via the Agency's intranet. This training material describes DOB's language access policies and procedures and the Citywide Interagency Language Access Protocol. We reviewed a copy of the employee-training material and training sign in sheet. We verified that the employees were employed by DOB as of that time.
12. Are there any signs or postings DOB regarding free available language assistance?	Yes	DOB has wall posters and desktop signage indicating free interpretation assistance is available in the designated areas deemed to be high traffic areas where DOB provides services to the public. During site testing, we observed "Free Interpretation Services Available" signs posted in the agency's public/common areas and office areas. In addition, there is a continuous PowerPoint presentation in the waiting area that displayed the availability of free language translation services. Furthermore, Language Line telephones have 20 LEP language posted on the headset.
13. Did DOB establish an appropriate monitoring and measurement system regarding the provision of agency language services?	Yes	DOB maintains a record keeping system that tracks the request for services in LEP languages and determines its capacity to service those LEP customers. The language access coordinator in each borough office and central unit provides a monthly report to the Director of Customer Service. This report documents DOB's interaction with the LEP customer during in-person visits at the customer service windows and inspections, telephone calls and public outreach.
14. Did DOB create public awareness strategies for language services?	Yes	DOB provides direct language assistance services. DOB advertises the availability of language access services on public communications, via website, media broadcast and outreach presentation through community boards, civic associations, homeowner groups, borough presidents, press releases, event flyers, and other appropriate communications.

LEP TESTS CONDUCTED

Test	Criteria For Evaluation	Auditors' Assessment
1. Anonymous phone calls.	<ul style="list-style-type: none"> Was a staff person able to respond to the call in the language of need, or transfer the call to another staff person or a telephonic Interpreter service? 	<p>DOB's main public access line, which is 311, is able to provide telephonic interpreter services in the top 10 LEP languages.</p> <p>DOB's main access line during normal business is in English. However, when customer service operators answer the calls, questions can be answered in the top 10 LEP languages, as required by Local Law 30.</p>
2. Is the website accessible in languages other than English?	<ul style="list-style-type: none"> Was public information available in languages other than English? 	<p>Of the 103 languages listed on DOB's website, we sampled and successfully translated the top 10 languages spoken in New York City.</p>
3. Translate "You Have a Right to Free Interpretation" posters.	<ul style="list-style-type: none"> Did the poster state that free translation and interpretation services were available? 	<p>DOB's signage kit contain multilingual poster informing residents with LEP that they can request free interpretation.</p>

LOCAL LAW 30 COMPLIANCE --- OBSERVATION



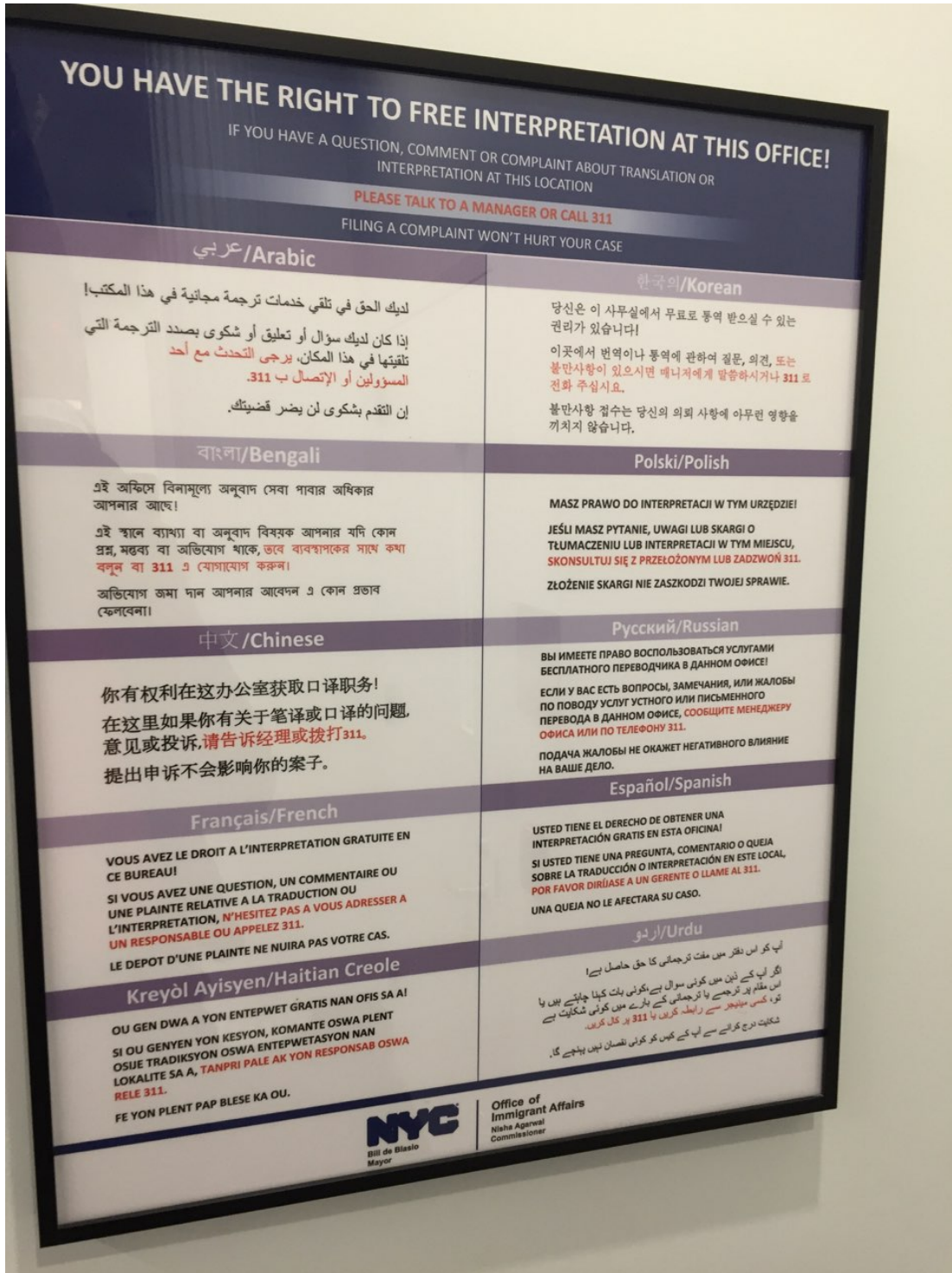
INSTRUCTIONS FOR LANGUAGE LINE TELEPHONE HANDSET FOR FREE INTERPRETATION SERVICES

LOCAL LAW 30 COMPLIANCE-- OBSERVATION



POWER POINT TELLING CONSUMERS THAT THEY CAN RECEIVE FREE INTERPRETATION

LOCAL LAW 30 COMPLIANCE-- OBSERVATION



NOTIFICATION OF THE AVAILABILITY OF FREE INTERPRETATION SERVICES



Thomas Fariello, R.A.
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May 14, 2019

Ms. Marjorie Landa
Deputy Comptroller for Audits
New York City Office of the Comptroller
1 Centre Street, Room 1100
New York, NY 10007-2341

Re: Draft Letter Report on the Department of Buildings' Compliance with Local Law 30 Regarding Access to City Services for Residents with Limited English Proficiency; Audit Number SZ18-130A

Dear Ms. Landa:

Thank you for giving us the opportunity to respond to the recommendation in the above referenced audit report. We view your input as assistance in furthering our commitment to provide all of our customers with meaningful access to our services.

As your report indicates, the objective of the audit was to determine whether the New York City Department of Buildings (DOB) is complying with Local Law 30, which is intended to make City agencies more accessible for Limited English Proficient (LEP) customers.

Response to Recommendations:

Recommendation 1:

"DOB should continue to adhere to Local Law 30 to ensure that it adequately meets the language needs of the communities it serves."

DOB's Response:

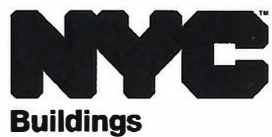
The Department of Buildings agrees with your recommendation, and we are pleased that your audit determined that we are in compliance with Local Law 30, and will continue to maintain its compliance.

Recommendation 2:

"DOB should ensure that all documents that it deems essential are translated in the top 10 LEP languages as required."

DOB's Response:

The Department of Buildings agrees with your recommendation, and will continue to maintain its compliance, and as noted in the audit, we have identified essential documents that are in the process of being translated



into the top ten LEP languages. We will complete this process before the July 1, 2020 deadline.

We appreciate the time and effort that you and your staff dedicated to performing this audit.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas Fariello", written over a large, stylized blue scribble.

Thomas Fariello, RA
Acting Commissioner

cc: George Davis III
Archana Jayaram
Jody Kaplan
Germain Difo
Frank Torres
Kerry Castro