



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 Veterans'
Services with Local Law 30 Regarding
Access to City Services for Residents
with Limited English Proficiency

SZ20-063A

January 30, 2020

<http://comptroller.nyc.gov>



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

January 30, 2020

To the Residents of the City of New York:

My office has audited the New York City Department of Veterans' Services (DVS) to determine whether DVS 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 DVS to help ensure that they are complying with applicable laws and regulations and that they are providing residents with access to important City services.

The audit found that DVS generally complied with Local Law 30. Our review of DVS' Language Access Plan dated 2018 found that DVS has made continuous progress to provide meaningful language access to the agency's services for Limited English Proficient (LEP) customers. DVS' Language Access Plan describes the steps that DVS has taken to provide its services to the LEP population. Specifically, the audit found that DVS provides direct public services in the top 10 New York City LEP languages as required by Local Law 30. Further, the audit found that, through the City's contracts with language-services vendors (Language Line Services LLC and Geneva Worldwide, Inc.) and the City's 311 service, DVS has the ability to provide documentation, translation and phone interpretation services in 175 languages.

The report recommends that DVS continue to adhere to Local Law 30 to ensure that it adequately meets the language needs of the communities it serves.

The results of the audit have been discussed with DVS 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,

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 Veterans' Services with Local Law 30 Regarding Access to City Services for Residents with Limited English Proficiency

SZ20-063A

EXECUTIVE SUMMARY

In 2017, the New York City Council enacted Local Law 30, effective July 1, 2017, which requires New York City (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, consisting of 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 based on U.S. census data.

This audit focuses on whether the Department of Veterans' Services (DVS) complied with Local Law 30. DVS, created in April 2016,¹ works with City, New York State (State), and federal agencies, as well as regional private and not-for-profit partners, to improve the lives of all New York City veterans and their families. DVS seeks to ensure that homeless veterans have permanent housing and access to the support services they need to find and maintain their homes. In addition, DVS seeks to expand education and career opportunities for veterans and to provide information to them and their families about the availability of benefits, resources, and care Citywide. DVS states that it is committed to supporting veterans' mental health overall and to specifically addressing the full impact of war and their military service. DVS serves service members, veterans, or family members regardless of era of service, branch of service, or discharge status.

¹ Prior to 2016, New York City's veterans were served by the Mayor's Office of Veterans Affairs (MOVA).

Audit Findings and Conclusion

We found that DVS generally complied with Local Law 30. Our review of DVS' Language Access Plan dated 2018 found that DVS has made continuous progress to provide meaningful language access to the agency's services for Limited English Proficient (LEP) customers. Its Language Access Plan describes the steps that DVS has taken to provide its services to the LEP population.

Specifically, we found that DVS provides direct public services in the top 10 New York City LEP languages as required by Local Law 30. Further, we found that through Citywide contracts with language vendors, (Language Line Services LLC and Geneva Worldwide, Inc.) DVS has the ability to provide documentation, translation and phone interpretation services in 175 languages through the above contracts as well as the City's 311 service. Appendices I and II contain details of the specific items we tested and the results of our tests. Appendix III illustrates DVS' efforts to ensure Local Law 30 compliance.

Agency Response

In its response, DVS agreed with the audit's finding and recommendation. DVS stated, "DVS will maintain its compliance with Local Law 30 to ensure that residents with limited English proficiency can effectively navigate the NYC Department of Veterans' Services."

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.²

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 top 10 designated City-wide languages, consisting of (1) the top six 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 four 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.

² 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 six languages, and (2) data collected by the Department of Education, as to four 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.³
- 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 Appendices I, II, and III.

This audit focuses on whether DVS complied with Local Law 30. DVS, created in April 2016, works with City, State, and federal agencies, as well as regional private and not-for-profit partners, to improve the lives of all New York City veterans and their families. DVS seeks to ensure that homeless veterans have permanent housing and access to the support services they need to find and maintain their homes. In addition, DVS seeks to expand education and career opportunities for veterans; and to provide information to them and their families about the availability of benefits, resources, and care Citywide. DVS states that it is committed to supporting veterans' mental health overall and to specifically addressing the full impact of

³ 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.

war and their military service. DVS serves service members, veterans, or family members regardless of era of service, branch of service, or discharge status.

Objective

The objective of the audit was to determine whether DVS 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 DVS' Language Access Plan dated 2018 and other pertinent documents, interviewed key DVS personnel, and conducted site visits at DVS' offices throughout the five boroughs of New York City, where direct public services are located. Our scope period was from June 26, 2019 through November 15, 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 DVS officials during and at the conclusion of this audit. DVS officials were notified of our findings during the course of the audit and agreed that an exit conference was not necessary. On December 19, 2019, we submitted a draft report to DVS officials with a request for comments. We received a written response from DVS officials on January 2, 2020. In their response, DVS officials agreed with the audit's finding and recommendation, stating, "DVS will maintain its compliance with Local Law 30 to ensure that residents with limited English proficiency can effectively navigate the NYC Department of Veterans' Services."

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

FINDING AND RECOMMENDATION

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

Specifically, we found that DVS offered free interpretation services online, by mail, by telephone, and in person for engagement and client services, housing and support services. In addition free interpretations services are also offered for VetsThriveNYC, which is a program adapted from the City's broader ThriveNYC mental health initiative, and for the Veterans Success Network, which is a network of services that provide mentorship or guidance to veterans and their families to assist them in pursuing higher education and transitioning from military to civilian life through mentorships with corporate professionals, veteran career councils, veterans, and veterans in City government.

We also found that essential documents posted on DVS' website and those posted in locations with high consumer traffic have been translated to the top 10 languages other than English. These essential documents relate to several of DVS' responsibilities, including: building a community based approach for enduring mental, physical, and spiritual health for veterans; connecting with student veterans to ensure successful transitions to civilian life; creating connections to veteran and civilian mentors for all stages of life; empowering veterans to find success in the public and private sector workforce; and connecting veterans to legal resources through the City Bar Justice Center's Veteran Assistance Project.

In addition, we found that in the top 10 LEP languages, DVS provides LEP veterans with the ability to identify housing opportunities and coordinate the rent process for owners and property managers; for homeless veterans, it provides information to help to enable them to find and obtain safe, affordable housing; and for formerly homeless veterans and those at risk of becoming homeless, DVS provides support to help them achieve housing stability.

DVS provides direct services at its main office located at 1 Centre Street, 22nd floor, Suite 2208 in Manhattan on Monday through Friday from 9:00 a.m. to 5:00 p.m. In addition, it provides services at five satellite offices located at 9 Bond Street, 5th floor in Brooklyn, on Monday and Wednesday; 851 Grand Concourse, Room 209 in the Bronx on Wednesday and Thursday; 120-55 Queens Boulevard, Room 222 in Queens on Monday, Tuesday, and Thursday; 431 W 125th Street, Main floor in Manhattan on Monday and Thursday; and 10 Richmond Terrace Room G-15 on Tuesday and Wednesday in Staten Island.⁴ The hours of operation for the satellite offices are from 10:00 a.m. to 12:00 p.m. and then 1:00 p.m. to 4:00 p.m. We found that the DVS staff who work in waiting rooms and other high traffic areas were trained on the use of the telephonic services through Language Line Services, LLC., and were able to communicate in languages other than English with the LEP clients who called and visited the offices. In addition, DVS staff were able to use Geneva Worldwide, Inc. to prepare translations of written documentation.

Overall, we found that DVS 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.), DVS has the

⁴ Satellite offices enable veterans and their families to meet one-on-one with VA-credentialed outreach specialists in each of the five boroughs.

ability to provide documentation, translation, and phone interpretation services in 175 languages through the various contracts as well as the City's 311 service. Further, we found that through its contract with Accurate Communications, DVS can provide American Sign Language interpretation. Appendices I and II contain details of the specific items we tested and the results of our tests. Appendix III illustrates DVS' efforts to ensure Local Law 30 compliance.

Recommendation

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

DVS Response: "DVS will maintain its compliance with Local Law 30 to ensure that residents with limited English proficiency can effectively navigate the NYC Department of Veterans' Services."

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 Appendices I, II, and III for details.

We reviewed the DVS Language Access Policy and Implementation Plan issued in 2018, reviewed other pertinent documents, and interviewed key DVS personnel.

To achieve our objectives, we performed the following:

- Reviewed EO 120 and Local Law 30;
- Created compliance checklists to assess DVS' compliance with Local Law 30;⁵
- Conducted interviews with DVS' designated Language Access Coordinator and other staff members;
- Reviewed and assessed whether DVS' language assistance plan was developed in accordance with Local Law 30, using the required four-factor analysis;
- Tested whether DVS provided direct public services in at least the top 10 LEP languages spoken by the New York City population;⁶
- Obtained and reviewed documentation and assessed whether DVS 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 DVS' 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 DVS signage kits to determine whether they contained multilingual posters;
- Assessed whether DVS established an appropriate monitoring and measurement system regarding the provision of agency language services;
- Assessed whether DVS created appropriate public awareness strategies for the agency's serviced LEP population;
- Reviewed whether DVS' Language Access Plan is posted to its website; and

⁵ See Appendix I for the completed checklist created in connection with this audit.

⁶ See Appendix II for further descriptions of the tests we conducted.

- Accessed DVS' 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 DVS provide direct public services or emergency services?	Yes	DVS provides direct public services Citywide.
2. Does DVS have a Language Access Policy and Implementation Plan, and when was it instituted?	Yes	DVS' current Language Access Plan 2018 was developed by DVS and approved by the Mayor's Office of Immigrant Affairs in June 2018. This plan is currently posted on DVS' website.
3. Does DVS have a Language Access Coordinator?	Yes	DVS' Deputy Press Secretary 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 2017 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 DVS will revise and update the plan when necessary. The Language Access Plan is current as of July 2018.
5. Did the Language Access Coordinator oversee the execution of the Language Access Policy and Implementation Plan?	Yes	DVS' 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	DVS' language coordinator monitors the progress of the Language Access Plan.
7. Did DVS develop the plan using the four-factor analysis?	Yes	DVS' 2018 Language Access Plan was developed using the four-factor analysis and the language needs most often used by affected population. DVS utilizes historical data, for Factors 1 through 3. DVS considers the 210,808 New York City veterans as its core constituency. DVS' mission is to serve veterans and their families. Furthermore, all U.S military service branches require applicants to speak, read, and write English fluently. Therefore, an overwhelming majority of DVS' service population is proficient in English. According to DVS there is not enough data to distinguish LEP individuals in the eligible service population because the frequency that LEP individuals meet DVS is still low. However, DVS continues to meet and/or exceed its language access

		goals while interacting with the eligible service population. For the fourth factor, DVS contracted for language access services. DVS has access to internal and external language resources. Internally, assessments are conducted to leverage any in-house language proficiencies. However, bilingual staff in the top 10 languages are used primarily to communicate one-on-one with LEP clients and review already translated materials for quality and accuracy. Externally, DVS uses DCAS' contracted services to meet its language access requirements. Pursuant to their contract, Language Line provides telephone interpretations, and Geneva Worldwide Inc. provides translations of written documentation. In addition, DVS 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.
8. Does DVS provide services in languages based on at least the top 10 NYC LEP languages?	Yes	Pursuant to DVS' Language Access Plan, DVS provides services in the top 10 NYC languages, as required by Local Law 30. DVS has access to various 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 at least 100 languages as required by Local Law 30. Through its contracts, DVS has the capability of providing services in 175 languages. Moreover, DVS also uses the services of 311, which has telephonic capability for 175 languages. ⁷
9. Does DVS identify and translate their "most commonly distributed public documents?"	Yes	DVS' Language Access Plan identifies its most commonly distributed documents for translation into the top New York City 10 languages as documents that contain or elicit important and necessary information regarding the provision of basic city services, support key agency functions, and focus on what constituents must know. An example of documents that are translated is the Veterans Resource Guide.
10. Does DVS provide interpretation services (including telephonic interpretation) for the top 10 LEP languages and others as appropriate?	Yes	Through the Citywide contract with the Language Line Services, LLC., DVS is able to provide interpretation services in at least 100 languages, including the top 10 LEP Languages. DVS also contracts with Geneva Worldwide, Inc. to provide written transcription services. In addition, DVS uses translators from 311 which enables the agency to provide translation into 175 languages.

⁷ Source: NYC 311 Language Access Plan 2018. See Appendix II, Test 1, for the results of our test of 311 relating to DVS,

11. Does DVS train its frontline workers and managers on language access policies and procedures?	Yes	DVS updated its training manual and procedures in June 2018 and employees received the training as required by Local Law 30. The training manual and procedures are available via the Agency's intranet. This training material describes DVS' 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 DVS as of that time.
12. Are there any signs or postings in DVS regarding free available language assistance?	Yes	DVS has wall posters and desktop signage indicating free interpretation assistance is available in the designated areas deemed to be high traffic areas where DVS services the public. During site testing, we observed "Free Interpretation Services Available" signs translated into multiple languages posted in the agency's public/common areas and office areas. ⁸
13. Did DVS establish an appropriate monitoring and measurement system regarding the provision of agency language services?	Yes	DVS maintains a record-keeping system that tracks essential documents that have been translated and identifies requests for additional information and/or resources that are needed to address new needs resulting from changing and additional LEP communities. This enables DVS to create a translation schedule and budget necessary funds to address new demands.
14. Did DVS create public awareness strategies for language services?	Yes	DVS advertises the availability of language access services on public communications, via its website, through social media, outreach events, community events, flyers, event announcements and other posted activities.

⁸ Language translation posters can be found in areas that are solely occupied by DVS.

LEP TESTS CONDUCTED

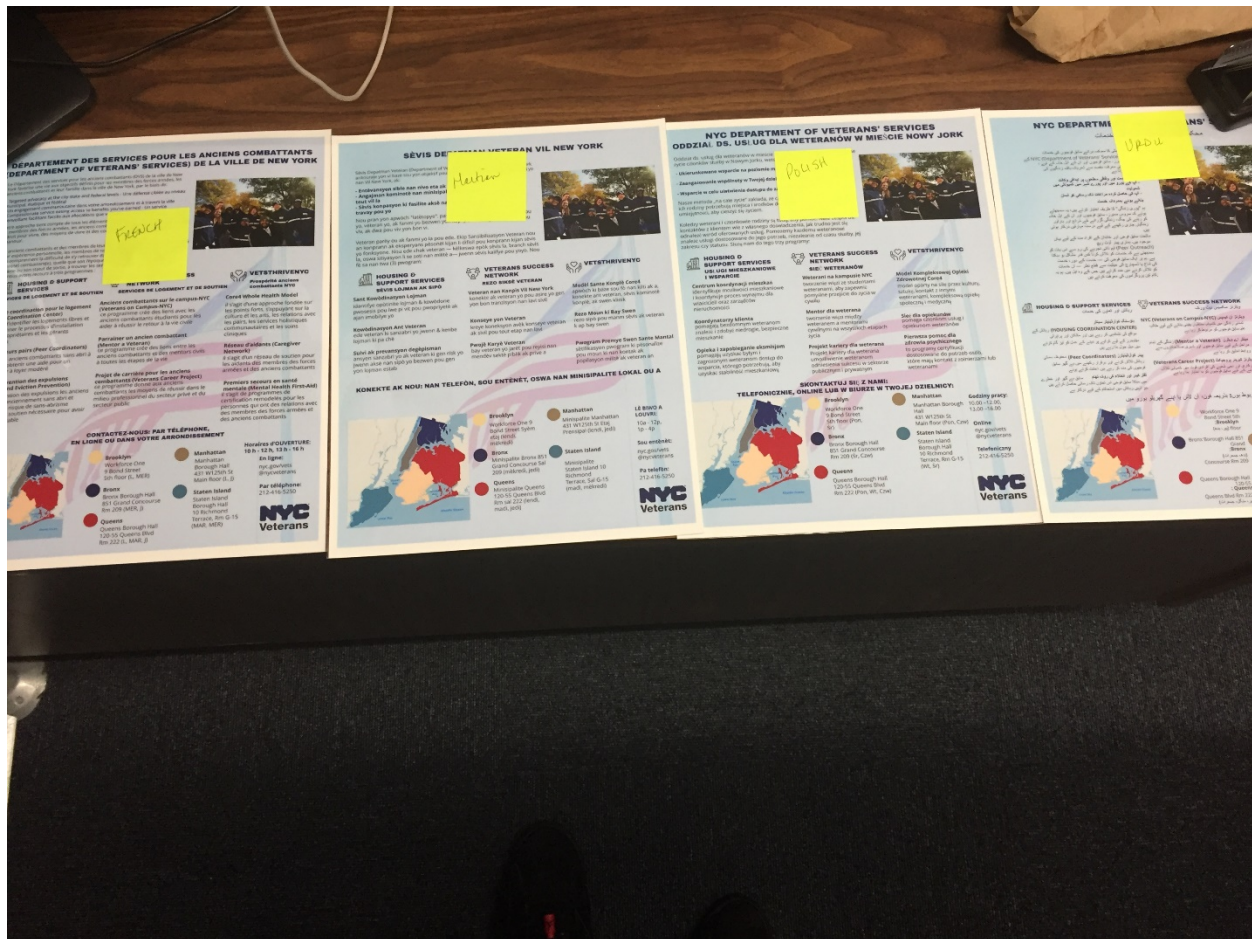
Test	Criteria For Evaluation	Auditors' Assessment
1. Anonymous phone calls to 311 to determine whether the 311 operator can inform the public where the DVS offices are located throughout the City in the 10 LEP required languages.	<ul style="list-style-type: none"> Was a staff person able to respond to the call in the language of need, or transfer the call to another staff person or a telephonic Interpreter service? 	<p>DVS' main public access line, which is 311, is able to provide telephonic interpreter services in the top 10 LEP languages and provide the locations of the DVS offices. When the 311 answered the call, the main menu recording prompted us to choose the language to be used. For the top six LEP languages, the appropriate LEP operator responded to us. For any additional languages, the call was transferred to an English speaking operator to determine the language of choice and then transferred the call to an additional translating service.</p> <p>DVS contracts with Citywide vendors to access to more than the 100 languages as required by Local Law 30. 311 provides access to 175 telephone languages.</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 DVS' 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>DVS' signage kit contain multilingual poster informing residents with LEP that they can request free interpretation.</p>

LOCAL LAW 30 COMPLIANCE --- OBSERVATION



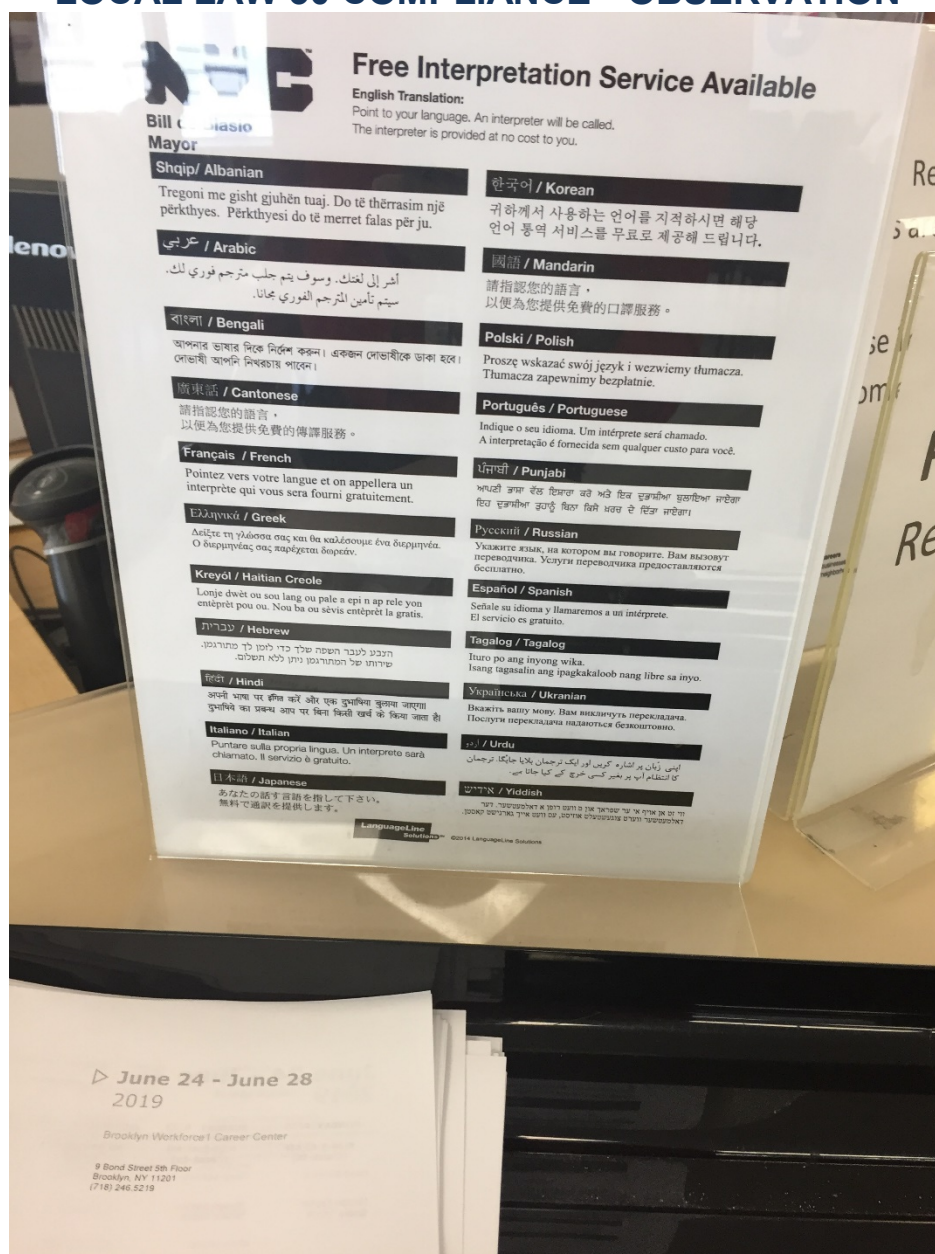
TELEPHONE HANDSET USED FOR FREE INTERPRETATION

LOCAL LAW 30 COMPLIANCE-- OBSERVATION



DVS' VETARANS RESOURCE GUIDE IN FRENCH, HAITIAN CREOLE, POLISH, AND URDU

LOCAL LAW 30 COMPLIANCE-- OBSERVATION



NOTIFICATION OF THE AVAILABILITY OF FREE INTERPRETATION SERVICES



James W. Hendon
COMMISSIONER

Jeffrey D. Roth
DEPUTY COMMISSIONER

January 2, 2020

Ms. Marjorie Landa
Deputy Comptroller for Audit
Office of the Comptroller, Bureau of Audit
Municipal Building
1 Centre Street, Room 100
New York, NY 10007

SUBJECT: Draft Letter Report on the New York City Department of Veterans' Services compliance with Local Law 30 regarding access to City services for residents with limited English Proficiency (Audit #SZ-603A)

Deputy Comptroller Landa:

The New York City Department of Veterans' Services (DVS) is in receipt of your Draft Letter Audit Report dated December 19, 2019 pertaining to the audit done on DVS' compliance with Local Law 30 regarding access to City services for residents with limited English proficiency (Audit #SZ20-603A).

DVS has received the report and the *Findings and Recommendations* and thanks the Office of the Comptroller for its finding that DVS generally complies with Local Law 30. DVS provides direct public services in the top 10 New York City LEP languages as required by Local Law 30. Further, through Citywide contracts with language vendors, (Language Line Services LLC and Geneva Worldwide, Inc.) DVS has the ability to provide documentation, translation and phone interpretation services in 175 languages through the above contracts as well as the City's 311 service.

DVS will maintain its compliance with Local Law 30 to ensure that residents with limited English proficiency can effectively navigate the NYC Department of Veterans' Services.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Hendon", is written over the word "Sincerely,".
James W. Hendon
Commissioner

cc: Ernestine M. Rivers, Audit Manager, Office of the New York City Comptroller
Jeffrey Roth, Deputy Commissioner, Department of Veterans Services
Jason Parker, Assistant Commissioner of Operations, NYC Department of Veterans' Services
Quamid Francis, Deputy Assistant Commissioner, NYC Department of Veterans' Services
George Davis, Director of Audit Services, Mayor's Office of Operations

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