



NEW YORK CITY COMPTROLLER  
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**Audit Report on the Bronx  
County District Attorney's  
Office's Provision of Language  
Access Services**

**SZ23-092A | October 4, 2023**





THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
BRAD LANDER

October 4, 2023

To the Residents of the City of New York,

My office has conducted an audit of the Bronx County District Attorney's Office's (BXDA's) compliance with relevant laws, standards, and guidelines regarding the provision of language access services to the non-English Language Preference (NELP) population. The audit also assessed whether the NELP population was fairly served by BXDA. We conducted this audit to ensure residents with NELP have adequate and effective access to City services and ensure equity and inclusion.

The audit found that BXDA generally complies with the translation standards prescribed by relevant laws, standards, and guidelines, with some exceptions. The language access services provided generally meet the needs of the NELP population as intended, and the NELP population generally has the same access to government services as the English-speaking population. However, BXDA was not fully compliant with certain aspects of Local Law 30 related to Language Access Plans (LAP) and the translation of commonly distributed documents as well as certain information posted to the BXDA website.

The audit makes five recommendations, including, that BXDA ensure that all documents commonly distributed to the public are translated into the top ten designated citywide languages; its website is amended to ensure all vital information on the Immigrant Affairs Unit page can be translated; the LAP is updated to include select policies required by Local Law 30 that are missing; and the revised LAP is implemented with all due expediency and posted to its website.

I am pleased to report that BXDA agreed with the audit findings and recommendations and has already begun implementing the recommendations.

The results of this audit have been discussed with BXDA officials and their comments have been considered in preparing this report. BXDA's complete written response is attached to this report.

If you have any questions concerning this report, please email my Audit Bureau at [audit@comptroller.nyc.gov](mailto:audit@comptroller.nyc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "B. Lander".

Brad Lander  
New York City Comptroller

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# AUDIT IMPACT

## Summary of Findings

The audit found that the Bronx County District Attorney's Office (BXDA) generally complies with the translation standards prescribed by relevant laws, standards, and guidelines, with some exceptions. The language access services provided generally meet the needs of the non-English Language Preference (NELP) population as intended, and the NELP population generally has the same access to government services as the English-speaking population.

However, BXDA was not fully compliant with certain aspects of Local Law 30 related to Language Access Plans (LAP) and Language Access Coordinators (LAC).

## Intended Benefits

The audit assessed BXDA's compliance with relevant laws, standards, and guidelines to ensure residents with NELP have adequate and effective access to City services, assessed whether the NELP population was fairly served by BXDA. The audit identified areas regarding the translation of its most commonly distributed documents, LAP and website where BXDA could improve access to its services.



# INTRODUCTION

## Background

New York City is home to one of the most diverse populations in the world, with more than 3 million foreign-born residents hailing 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% of City residents aged five and over are not proficient in English. For residents with a non-English Language Preference (NELP), interacting with City government and receiving access to City services can be a challenge.<sup>1</sup>

Since 2003, the City government has striven to enhance language access for NELP residents through a series of legislative actions including:

- **Executive Order No.120 (EO 120):** EO120, New York’s “Citywide Policy on Language Access to Ensure Effective Delivery of City Services,” was established in 2008, and required all City agencies providing direct customer services to provide language access services.
- **Local Law 25 of 2016 (LL25):** LL25 required all City agency websites to include a translation feature for the most widely used languages in the city, other than English.
- **Local Law 30 of 2017 (LL30):** LL 30 : Requires all City agencies that provide direct public or emergency services, to designate a Language Access Coordinator (LAC) and to develop Language Access Plans (LAP).<sup>2 3</sup> LAPs consist of the following components: identification and translation of the most commonly distributed public documents; interpretive services, including telephonic interpretation in at least 100 languages; training of frontline workers on language access policies; posting of signage in conspicuous locations about the availability of free interpretation services; and the establishment of an appropriate monitoring and measurement system regarding the provision of agency language services. Agencies were also expected to incorporate consideration of language access in public communications (including emergency notifications, public hearings, and

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<sup>1</sup> NYC Administrative Code, Title 8, Chapter 10, Equal Access to Human Services, § 8-1002, Local Law 73 of 2003 (LL73), LL30, and EO120 use the term “limited English proficient” or “LEP”; however, for the purposes of this report, the term “non-English language preference” (or “NELP”) is used.

<sup>2</sup> City agencies that receive Federal funding, including BXDA, must apply a four-factor analysis when developing their LAPs. This is based on guidance issued by the U.S. Department of Justice, (U.S. Department of Justice (DOJ) effective June 12, 2002 (67 FR 41455). These factors include: the number or proportion of NELP persons in the eligible service population; the frequency with which NELP individuals come into contact with the agency; the importance of the benefit, service, information, or encounter to the NELP person; and the resources available to the agency and the costs of providing various types of language services.

<sup>3</sup> US Executive Order 13166 of August 11, 2000 (EO13166), Improving Access to Services for Persons With Limited English Proficiency, requires agencies to prepare a plan to improve access to their programs and activities. The American Bar Association also recommends the development and use of Language Access Plans. New York State Executive Chapter 18, Article 10, § 202-a requires agencies to develop a Language Access Plan.

events), and craft widely distributed documents using plain language principles. The law also required agencies to update their LAPs every three years.

Federal, state, and local laws and regulations require that district attorney offices provide language support that allows NELP people to meaningfully participate in their programs and activities. The federal government and New York State have also enacted laws and issued guidance that enhance language access, both within the justice system (which the district attorney offices are a part of) and state government. These actions include:

- **Federal Executive Order 13166 (EO13166):** Signed by the President of the United States in 2000, requires federal agencies to develop and implement a system to provide services for the NELP population. It also requires that recipients of Federal financial assistance provide meaningful access to their NELP applicants and beneficiaries. EO13166 also requires federal agencies to comply with United States Department of Justice Guidance that recommends a written plan to address the needs of the NELP population.
- **Consolidated Laws of New York, Chapter 18, Article 10, § 202-a (Section 202-a):** Section 202-a requires each state agency that provides direct public service to translate all vital documents into the 12 most common non-English languages spoken by NELP individuals in the state, based on data in the most recent American Community Survey published by United States Census Bureau. It requires agencies to provide interpretation services, designate a language access coordinator, and develop an LAP. The LAP shall include the means by which the agency will provide language assistance services, the titles of all available translated documents and the languages into which they have been translated, a training plan for agency employees, plan for annual internal monitoring of the agency's compliance, and a description of how the agency intends to notify the public of the language services provided.
- **New York State Unified Court System Regulations, Part 217:** Part 217 of the Uniform Rules for NYS Trial Courts states that the court will provide interpreting services free of charge, in criminal, civil matters, and family court, for all participants in the process, including defendants, parties, witnesses, victims and those who use non-courtroom services provided by the court.

BXDA investigates and prosecutes criminal conduct in Bronx County. BXDA works in partnership with law enforcement and the people of the Bronx to pursue justice for victims of crime, prevent crime in all its forms, and promote the safety and well-being of all citizens of the borough. BXDA has various units and bureaus that interact directly with the public, including the Immigrant Affairs Unit. The Immigrant Affairs Unit is charged with investigating and prosecuting financial fraud complaints targeting immigrants. It is also committed to aiding and encouraging both documented and undocumented immigrant victims, who may fear cooperating with law enforcement, through enhanced community outreach and proactive education efforts.

One of the missions of the NYS Unified Court System is to deliver equal justice under the law. To achieve that goal, all New Yorkers must have equal access to the courts and the justice system. The court will provide an interpreter to any party with an interest in a court proceeding, such as a litigant, criminal defendant, or witness, to ensure that they can meaningfully participate in that proceeding. Without interpreters, NELP individuals do not have equal access, and the outcomes of court proceedings could be negatively affected if the information provided by a NELP individual is misunderstood or not properly addressed. The interpreters are provided at no cost to ensure

that NELP individuals of any economic means can access the services provided by the courts and its affiliates. The court will also ensure that interpreters are providing fair and impartial interpretation in a professional manner to those who need it.

## Objective

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

## Discussion of Audit Results with BXDA

The matters covered in this report were discussed with BXDA officials during and at the conclusion of this audit. An Exit Conference Summary was sent to BXDA on May 24, 2023, and discussed with BXDA officials at an exit conference held on May 31, 2023. On June 9, 2023, we submitted a Draft Report to BXDA with a request for written comments. We received a written response from BXDA on June 26, 2023. In its response, BXDA generally agreed with the report's findings and recommendations, stating: "I am pleased to provide the following summary of the steps we have taken to address the recommendations in the report."

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



# DETAILED FINDINGS

The audit found that BXDA generally complies with the translation standards prescribed by relevant laws, standards, and guidelines, with some exceptions. The language access services provided generally meet the needs of the NELP population as intended, and the NELP population generally has the same access to government services as the English-speaking population.

However, BXDA was not fully compliant with certain aspects of LL30. Specifically, BXDA did not ensure translation of its most commonly distributed documents in the top 10 NELP languages; create a policy to address complaints; include policies for providing language access in public communications. Furthermore, BXDA did not name a Language Access Coordinator in the LAP or post the name and title on its website. These are discussed below.

## BXDA Generally Provides Language Access Services to NELP Clients as Required

The auditors found that BXDA:

- **Provides language access services to NELP clients.** BXDA is contracted with Language Line Services, Inc., an interpretation and translation service provider. The contract states that Language Line will provide on-site interpretation in over 130 languages, telephonic or video interpretation in over 240 languages, and translation in over 380 languages, including the top 10 NYC NELP languages. BXDA also has in-house staff that can provide Spanish interpretation.
- **Notifies the public of the right to free interpretation services.** BXDA informs the public of the availability of interpretation services by posting signs in conspicuous, publicly accessible locations within its offices, and by posting a notice on its website. The signs inform the public of the availability of free interpretation services and are translated into 88 languages, including English and the top 10 NYC NELP languages. However, the signs may be difficult to read due to the size of the sign and the size of the text on the sign. BXDA should update its signage to correct this.
- **Provides access to pertinent information on its website in over 100 languages.** The BXDA website has a translation feature which, when selected, produces a dropdown menu allowing the user to select from 132 languages, including the top 10 NYC NELP Languages. The translation feature allows a NELP user to access information that may be relevant to them, such as information regarding BXDA's Special Victims Unit, Immigrant Affairs Unit, Office of Diversity, Equity and Inclusion, and the Civilian Complaint Unit, whose page allows a user to report incidents of alleged police misconduct. The Immigrant Affairs page provides advice about fraud protection. This advice does not translate along with the rest of the Immigrant Affairs page. BXDA should update its website to correct this.

BXDA trains its staff in the availability of language access services. BXDA submitted two training class videos that illustrated that training had been given to staff November 2021 and October 2022 that detailed their procedures for requesting interpreter and translation services. BXDA staff

are trained to make requests by completing forms found on BXDA's intranet. Staff can also make requests for American Sign Language interpreters by submitting those forms to the Interpretation Services Unit. The training video also states that BXDA has Spanish interpreters on staff and displays the page on the agency intranet that contains the Spanish interpreters' contact information. Requests for translation of documents (other than Spanish) to be used in court (certified) must be submitted 48 hours prior to the date needed. Spanish certified translation documents can be provided on short notice.

## **BXDA Was Not in Compliance with Several Key Aspects of LL 30**

### **Most Commonly Distributed Documents Not Translated into All Top 10 NYC NELP Languages**

LL30 requires agencies to identify and translate documents that are most commonly distributed to the public. BXDA submitted digital copies of several documents they identified as its most commonly distributed. Those documents are a Title VI/Limited English Proficiency Plan Notification, a Subpoena, a Witness Letter, an Authorization for the Release of Medical Information, a Victim Contact letter, and Waiver of the Right to Appeal.

The Title VI/Limited English Proficiency Plan Notification has not been translated into 6 of the top 10 NYC NELP languages (Russian, Bengali, Haitian Creole, Korean, Urdu, and Polish).<sup>4</sup> The subpoena has not been translated into 6 of the top 10 NYC NELP languages (Spanish, Russian, Haitian Creole, Korean, Urdu, and Polish).<sup>5</sup> The Witness Letter has not been translated into 6 of the top 10 NYC NELP languages (Spanish, Russian, Haitian Creole, Korean, Urdu, and Polish).<sup>6</sup>

The Authorization for the Release of Medical Information, Victim Contact letter, and Waiver of the Right to Appeal were only translated into Spanish.

BXDA should provide its most commonly distributed documents in all required languages, as well as any additional languages that reflect the local NELP community, and should use its contracted language service providers to translate documents as needed.

### **BXDA's Language Access Plan Not Fully Compliant with LL 30**

Language access plans (LAP) used for the provision of interpretation and translation services ensure both equal access to government services for English speaking and NELP individuals and agency compliance with applicable laws and regulations. BXDA has created and implemented a

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<sup>4</sup> The Title VI/Limited English Proficiency Plan Notification was translated into 4 of the top 10 NYC NELP languages (Arabic, French, Chinese [Simplified and Traditional], and Spanish), as well as Albanian, Hindi, Punjabi, Wolof, and Fula.

<sup>5</sup> The Subpoena was translated into 4 of the top 10 NYC NELP languages (Arabic, Bengali, Chinese [Simplified and Traditional], and French), as well as Fula, Hindi, and Mandingo.

<sup>6</sup> The Witness Letter was translated into 4 of the top 10 NYC NELP languages (Arabic, Bengali, Chinese [Simplified and Traditional], and French), as well as Fula and Albanian.

language access plan. However, BXDA did not include certain key aspects as required by Local Law 30, nor has BXDA named a member of staff specifically as the Language Access Coordinator (LAC).

BXDA's LAP is posted on its website in the "Reports & Policies" section within the tab titled "Language & Web Accessibility." The name and title of the LAC is not posted on BXDA's website, nor is an LAC named in the LAP. The LAP mentions the Director of Interpreting Services and Equal Employment Opportunity (EEO) Officer but does not designate either as the LAC.

The LAP includes plans for training of frontline workers and public awareness strategies and determines the agency's capacity to provide language access services through staff and by contracting with language service providers. The LAP also accounts for the collection of data related to the provision of language access services and considers how complaints about language access can be filed.

BXDA's LAP does address several key aspects required by the law, including descriptions of how BXDA will provide language access services, how it considered the four factors in creating the LAP, and how the needs of the local NELP population likely to be served were incorporated.

However, the LAP does not state, as required by LL Law 30, that BXDA will:

- Ensure that its most commonly distributed documents are translated into the top 10 NYC NELP languages (the LAP only specified that vital documents would be translated into six non-English languages most commonly spoken in Bronx County).
- Create policies for addressing complaints in a timely manner (the LAP accounts only for how complaints are to be filed).
- Ensure the policy is updated at least once every three years (the LAP accounts for substantial changes being made and distributing the most current version to employees but does not include a timeframe for doing so).
- Plan for addressing language access in their emergency preparedness response.
- Include policies for providing language access in public communications, such as emergency notifications, public hearings and events, and press releases.

BXDA is required to comply with LL30, and moreover, an LAP that incorporates all requirements of the Local Law 30 would more effectively support the agency in ensuring fair, equitable, and meaningful access to services that are fundamental to justice and civil liberties.

When BXDA was informed that the LAP was incomplete, officials responded that the agency will update the plan to include the necessary information. At the exit conference, BXDA provided documentation that the language access signage had been enlarged and that they are currently working on implementing our recommendations.

# RECOMMENDATIONS

To address the findings, the auditors propose that BXDA:

1. Update its language access signs to ensure they can be easily read.

**BXDA Response:** The agency agreed with this recommendation.

2. Update its website to ensure all vital information on the Immigrant Affairs Unit page can be translated.

**BXDA Response:** The agency agreed with this recommendation.

3. Ensure that all documents commonly distributed to the public are translated into the top 10 NYC NELP languages while continuing to ensure that it translates those documents into languages that are likely to serve the local NELP community.

**BXDA Response:** The agency agreed with this recommendation.

4. Amend the language access plan to include policies (1) to state that vital documents should be translated into the top 10 NYC NELP languages; (2) for timely response to complaints; (3) providing language access in all public communications and emergency preparedness responses; and (4) for updating the Language Access Plan at least every three years in accordance with Local Law 30.

**BXDA Response:** The agency agreed with this recommendation.

5. Implement the revised language access plan with all due expediency and post it to its website along with the name and title of the LAC.

**BXDA Response:** The agency agreed with this recommendation.

## Recommendation Follow-up

Follow-up will be conducted periodically to determine the implementation status of each recommendation contained in this report. Status updates are reported in the Audit Recommendations Tracker available here: <https://comptroller.nyc.gov/services/for-the-public/audit/audit-recommendations-tracker/>

# SCOPE AND METHODOLOGY

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

The scope period was from January 1, 2018, through May 23, 2023.

To achieve the audit objectives, auditors performed the following:

- Reviewed relevant criteria including:
  - NYC Administrative Code, Title 8, Chapter 10, Equal Access to Human Services §8-1002 (LL73);
  - NYC Executive Order No. 120 July 22, 2008 (EO120): “Citywide Policy on Language Access to Ensure Effective Delivery of City Services;
  - NYC Administrative Code, Title 23, Chapter 8, City Website, § 23-801 (LL 25)).
  - NYC Administrative Code, Title 23, Chapter 11, Language Access § 23-1101 (LL 30)
  - US Executive Order 13166 of August 11, 2000 (EO13166), Improving Access to Services for Persons with Limited English Proficiency;
  - New York State Unified Court System Regulations, Part 217 (Part 217) Administrative Rules of the Unified Court System & Uniform Rules of the Trial Courts;
  - U.S. Department of Justice (DOJ) effective June 12, 2002 (67 FR 41455). 67 FR 41455;
  - American Bar Association Standards for Language Access in Courts; and
  - Consolidated Laws of New York, Chapter 18, Article 10, § 202-a (Section 202-a) Section § 202-a.
- Created compliance checklists to assess BXDA’s compliance with LL 30.
- Conducted interviews and walkthroughs with key BXDA personnel involved with the provision of language access service.
- Requested BXDA language access plan for the period 2018 through 2023.
- Reviewed and assessed whether the current BXDA’s language access plan was developed in accordance with Local Law 30, using the required four-factor analysis.

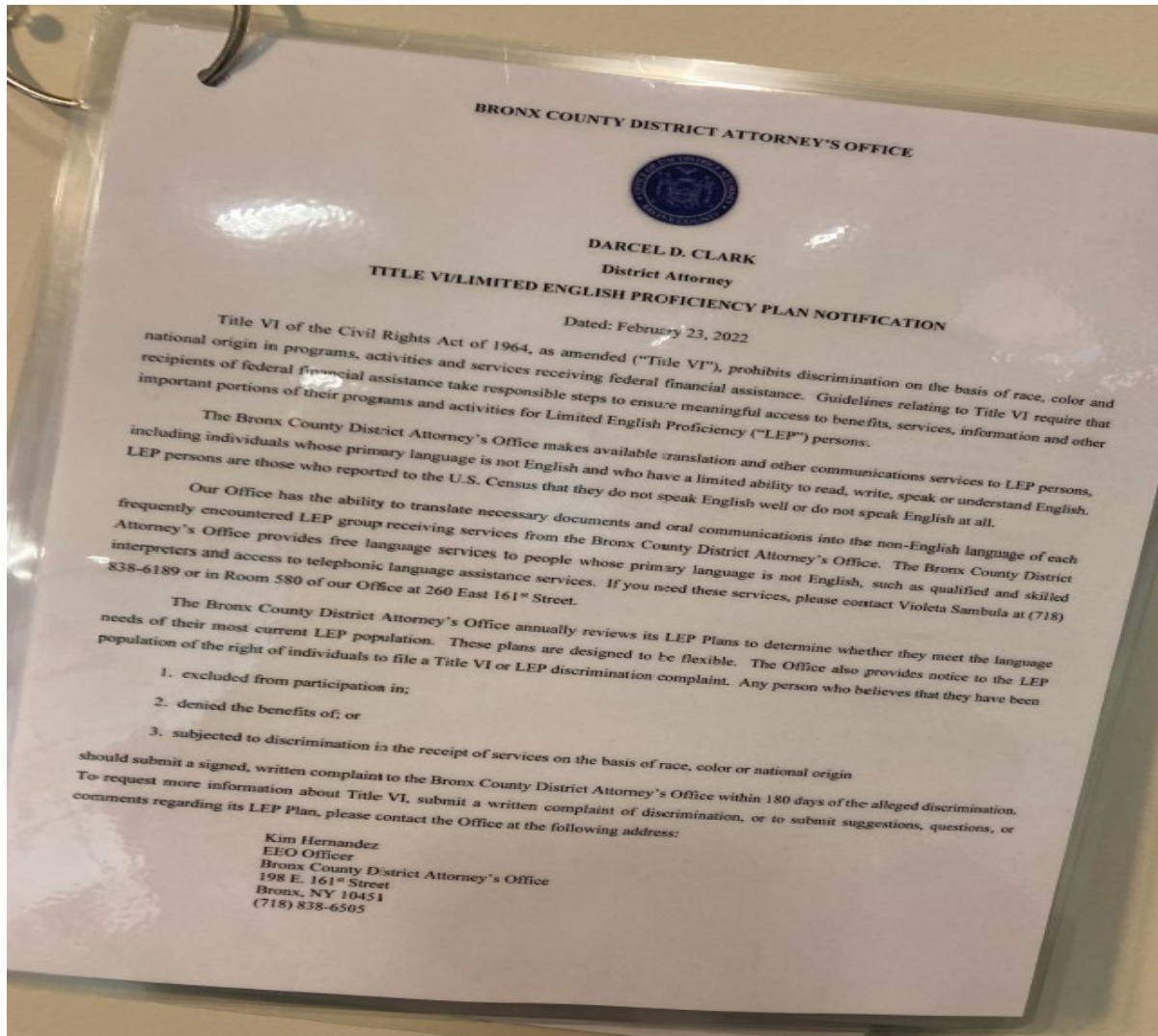
- Tested whether BXDA provided direct public services in at least the top 10 NELP languages spoken by the New York City population by (1) reviewing BXDCA Language Access Plan; (2) conducting visits at BXDA's locations; and (3) conducting interviews with pertinent personnel regarding the provision of language access services.
- Obtained and reviewed documentation and assessed whether BXDA identified and translated the agency's most commonly distributed public documents provided to or completed by the public.
- Conducted site visits to BXDA's locations in the Bronx to observe BXDA's translation services and ensure equity and inclusion for BXDA's NELP clients. To accomplish this, auditors (1) checked for the required signage and multilingual documents; (2) interviewed pertinent personnel regarding the provision of language access services on the process of providing language access; and (3) obtained and reviewed the employee manual for language access training and/or written policies and procedures.
- Reviewed BXDA signage kits to determine whether it contained multilingual posters.
- Reviewed and assessed whether BXDA established an appropriate monitoring and measurement system regarding the provision of agency language services.
- Reviewed and assessed whether BXDA created appropriate public awareness strategies for the agency's serviced NELP population by visiting BXDA's locations to determine whether the required notification of the right of free interpretation services is posted in conspicuous locations. Auditors observed various BXDA documents notifying the public of the right to interpretation such as the posters on the wall.
- Reviewed whether current BXDA's Language Access Plan and name and title of the designated Language Access Coordinator are posted to its website as of May 23, 2023.
- Accessed BXDA's website and translated the information into the top 10 languages spoken in New York City as of May 23, 2023.
- Determined whether it was appropriate to conduct a Client Survey to ascertain whether BXDA NELP clients were able to receive services in their preferred NELP language. Auditors discussed the potential for a survey with BXDA at the Entrance Conference and a Walkthrough site observation meeting. Auditors informed BXDA that the survey would not include identifying questions or any details about the reasons survey participants had sought services from BXDA. BXDA expressed concerns about a Client Survey, stating that any material discussed or answers to the survey questions would have to be disclosed to the defendants and their attorneys, which may have a negative impact on ongoing cases. BXDA also said that contacting victims or witnesses in closed cases may be impossible, or such contact might further traumatize them. Given these and other concerns, it was determined that including or conducting NELP surveys would be inappropriate for BXDA's language access audit.



# APPENDIX I

## BXDA LANGUAGE ACCESS COMPLIANCE OBSERVATIONS

### #1: BXDA SIGNAGE



BXDA signage is conspicuously placed and notifies the public of the availability of free interpretation in BXDA locations.

## #2: BXDA DOCUMENTS AVAILABLE IN MULTIPLE LANGUAGES



DARCEL D. CLARK  
District Attorney

215 East 161st Street  
Bronx New York 10451

(718) 590-2000

You are currently a witness in a pending criminal case. The case is being investigated and prosecuted by the Bronx District Attorney's Office.

It is possible that you might be contacted by someone concerning this case who does not work for the District Attorney's Office. You may call the District Attorney's Office and refer the person to us before you answer any questions. The defendant's Attorney's or his/her investigators may attempt to contact you to gather information on the case to help the defendant, who is their client. It is possible that the defendant's attorney or his/her investigators may say that they are "from the court" It is not the usual practice of the Court to send anyone to interview crime victims or witnesses. You have the right not to speak to these people. If anyone from the Bronx District Attorney's Office speaks to you, he or she will identify himself as a representative of the Office and, upon request, show you identification

Before you speak to anyone about this case, you should be sure that you know who you are speaking to. You have the right to request to see the identification of the person wishing to speak with you. If the person refuses to show identification or misrepresents who he/she works for, you should contact the assigned Assistant District Attorney or his/ her supervisor immediately.

আপনি বর্তমানে একটি বিচারাধীন ফৌজদারি মামলার একজন সাক্ষী। ব্রক্স ডিস্ট্রিক্ট অ্যাটর্নি অফিস (Bronx District Attorney's Office) মামলাটির তদন্ত ও বিচার করছে।

এটা সম্ভব যে এই মামলার বিষয়ে এমন কেউ আপনার সাথে যোগাযোগ করতে পারেন যিনি ডিস্ট্রিক্ট অ্যাটর্নি অফিসের জন্য কাজ করেন না। আপনি ডিস্ট্রিক্ট অ্যাটর্নির অফিসে (Bronx District Attorney's Office) কল করতে পারেন এবং কোনো প্রশ্নের উত্তর দেওয়ার আগে সেই ব্যক্তিকে আমাদের কাছে পাঠাতে পারেন। বিবাদীর অ্যাটর্নি বা তার তদন্তকারীরা বিবাদীকে সাহায্য করার জন্য যিনি তাদের মঞ্চে, মামলার তথ্য সংগ্রহ করতে আপনার সাথে যোগাযোগ করার চেষ্টা করতে পারেন। এটা হতে পারে যে বিবাদীর অ্যাটর্নি বা তার তদন্তকারীরা বলতে পারেন যে তারা "আদালত থেকে আসছেন"। অপরাধের শিকার বা সাক্ষীদের সাক্ষাৎকার নিতে কাউকে পাঠানো আদালতের স্বাভাবিক প্রথা নয়। এইসকল লোকের সাথে কথা না বলার অধিকার আপনার আছে। যদি ব্রক্স ডিস্ট্রিক্ট অ্যাটর্নি অফিস (Bronx District Attorney's Office) থেকে কেউ আপনার সাথে কথা বলেন, তাহলে তিনি নিজেকে অফিসের একজন প্রতিনিধি হিসেবে পরিচয় দেবেন এবং আপনি পরিচয়পত্র দেখাতে অনুরোধ করলে তিনি তা আপনাকে দেখাবেন।

আপনি এই মামলা সম্পর্কে কারো সাথে কথা বলার আগে, আপনাকে নিশ্চিতভাবে জানতে হবে যে আপনি কাাদের সাথে কথা বলছেন। আপনার সাথে কথা বলতে ইচ্ছুক ব্যক্তির পরিচয় দেখানোর অনুরোধ জানানোর অধিকার আপনার আছে। যদি ব্যক্তিটি পরিচয় দেখাতে অস্বীকার করেন বা তিনি কার জন্য কাজ করছেন তা ভুলভাবে উপস্থাপন করেন, তাহলে আপনাকে অবিলম্বে নির্ধারিত সহকারী ডিস্ট্রিক্ট অ্যাটর্নি (Assistant District Attorney) বা তার সুপারভাইজরের সাথে যোগাযোগ করতে হবে।



DARCEL D. CLARK  
District Attorney

215 East 161st Street  
Bronx New York 10451

(718) 590-2000

You are currently a witness in a pending criminal case. The case is being investigated and prosecuted by the Bronx District Attorney's Office.

It is possible that you might be contacted by someone concerning this case who does not work for the District Attorney's Office. You may call the District Attorney's Office and refer the person to us before you answer any questions. The defendant's Attorney's or his/her investigators may attempt to contact you to gather information on the case to help the defendant, who is their client. It is possible that the defendant's attorney or his/her investigators may say that they are "from the court" It is not the usual practice of the Court to send anyone to interview crime victims or witnesses. You have the right not to speak to these people. If anyone from the Bronx District Attorney's Office speaks to you, he or she will identify himself as a representative of the Office and, upon request, show you identification

Before you speak to anyone about this case, you should be sure that you know who you are speaking to. You have the right to request to see the identification of the person wishing to speak with you. If the person refuses to show identification or misrepresents who he/she works for, you should contact the assigned Assistant District Attorney or his/ her supervisor immediately.

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您目前是一起未决刑事案件的证人。布朗克斯区地方检察官办公室正对此案开展调查并提起公诉。

一些非地方检察官办公室工作人员可能会就此案与您联系。在回答任何问题之前，您可以致电地方检察官办公室，并让我们查询此人的身份。被告人律师或其调查人员可能会尝试联系您，以收集案件相关信息，从而帮助被告人（即他们的客户）。被告人律师或其调查人员有可能会说他们“受法院指派”，然而法院通常不会派人去询问犯罪受害者或证人。您有权不理睬这些人员。如果布朗克斯区地方检察官办公室的任何人员要与您交谈，他们会表明自己是该办公室的代表，并会根据要求向您出示身份证明。

在您与任何人谈论此案件前，您应当确定与您交谈之人的身份。您有权要求查看希望与您交谈之人的身份证明。如果此人拒绝出示身份证明或谎报其工作单位，您应当立即联系指定的地方助理检察官或其主管。

## IDENTIFICACIÓN DE LA TRATA: ALERTAS ROJAS

### VIOLENCIA EN LA PAREJA:

- Moretones, quemaduras, cicatrices
- Temor a la pareja

### FALTA DE CONTROL:

- No se permite a la víctima llamar o reunirse con familia/amigos
- Siempre está acompañada por su pareja
- Le da sus ingresos a su pareja

### ADOLESCENTES:

- Escapan de la casa
- Redes sociales con contenido sexual explícito
- Ropa sexualmente provocativa
- Salen con hombres mayores
- Abuso de sustancias

### PROSTITUCIÓN:

- Publicidad en línea
- Cosas nuevas/caras sin que se le conozca un trabajo
- Uso de jerga como "papi", "zona", "hotel" o "chulo"

## ***NOSOTROS PODEMOS AYUDAR***

La Unidad de Trata de Personas del Fiscal del Distrito del Bronx persigue a los tratantes y ayuda a las víctimas mediante:

- Ubicación de emergencia
- Consejería y terapia
- Capacitación y ubicación laboral
- Remisión a servicios sociales
- Enjuiciamiento de tratantes

### **Unidad de trata de personas**

Lunes a viernes de 9 a. m. a 5 p. m.  
718-838-6535

Defensa de la víctima: 917-280-4212

## ***¿QUÉ PUEDE HACER USTED PARA AYUDAR?***

SI USTED O ALGUIEN QUE CONOCE  
ESTÁ EN PELIGRO INMINENTE

**LLAME AL 911**

**Línea directa nacional para casos de  
trata de personas**

24 horas al día, los 7 días de la semana.  
1-888-373-7888



Darcel D. Clark  
Fiscal del distrito

## DETENGAMOS LA TRATA DE PERSONAS



OFICINA DEL FISCAL  
DEL DISTRITO DEL BRONX  
**DARCEL D. CLARK**  
DEL DISTRITO DEL  
BRONX

*"Buscamos la justicia con integridad"*



### #3: LANGUAGE IDENTIFICATION CARD



Language Identification Card used by BXDA staff used to help identify a client's preferred language for services.



**OFFICE OF THE DISTRICT ATTORNEY, Bronx County**

**DARCEL D. CLARK**  
*District Attorney*

198 East 161st Street  
Bronx, New York 10451

(718) 590-2000

June 26, 2023

Maura Hayes-Chaffe  
Deputy Comptroller for Audit  
New York City Comptroller's Office  
1 Centre Street, Room 1100  
New York, NY 10007

Dear Deputy Comptroller Hayes-Chaffe,

I am responding to your letter dated June 9, 2023, requesting comment on the draft letter report on language access services provided to Limited English Proficient (LEP) individuals by the Bronx County District Attorney's Office's (BXDA). I am pleased to provide the following summary of the steps we have taken to address the recommendations in the report.

The Comptroller's draft letter report included five recommendations. We address your recommendations below in the order in which they were addressed in the draft letter report.

**Recommendation #1**

In the draft letter report, you recommended that BXDA should "update its language access signs to ensure that they can be easily read."

Immediately following our walkthrough with your Office on April 5, 2023, we ordered large (18" x 24") "I speak" signs from Language Line Services. These signs explain an individual's right to interpreter services in English and other languages and allow an individual to request a qualified interpreter. BXDA has displayed these signs in our public-facing areas so that the public is aware of the language access services offered by our Office.

**Recommendation #2**

Your office recommended that BXDA "update its website to ensure all vital information on the Immigrant Affairs Unit page can be translated."

Our Public Information Bureau has updated the public-facing website to ensure that all information on the Immigrant Affairs Unit's page is accessible using a Google translation tool that translates the contents of the website into over 100 languages. This allows members of the public



Response to Comptroller's Report

June 26, 2023

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to access information on the services offered by Immigrant Affairs Unit in their spoken language. Further information will be added as necessary once BXDA can ensure that it is also accessible using the translation tool.

### **Recommendation #3**

Your office recommended that “all documents commonly distributed to the public are translated into the top NYC NELP languages.”

BXDA is working closely with Language Line Services to translate all documents that our Office commonly distributes to the public. We have been informed by Language Line Services that these translations will be completed by July 10, 2023. When we receive the translated documents from Language Line Services, we will promptly make them available to the public.

### **Recommendation #4**

In your draft letter report, you recommended that we amend our Language Access Plan “to include policies (1) to state that vital documents should be translated into the top NYC NELP languages; (2) for timely response to complaints; (3) providing language access in all public communications and emergency preparedness response; and (4) for updating the Language Access Plan at least every three years in accordance with Local Law 30.”

BXDA updated its Language Access Plan on June 1, 2023 in accordance with the recommendations set forth by your Office. The current ideation of the plan states that all vital documents will be translated into Spanish, Russian, Yiddish, French, Bengali, Arabic, Chinese, Mandarin, Korean, Haitian Creole, Italian, Polish, Urdu, Twi, and Fulani. These languages represent the top NYC NELP languages as well as the fifteen most commonly spoken languages in New York State.

Additionally, our current Language Access Plan includes a procedure to address complaints from the public concerning our language access services. We have created a Language Access Services complaint form that is attached to our Language Access Plan. This complaint form may be filled out by a member of the community and sent to our EEO Officer by mail or email. Once our EEO Officer receives the complaint, she will investigate the complaint and respond to the constituent within 14 days.

BXDA also updated its plan to ensure the continuation of language access services under emergency or crisis circumstances. Our Office will continue to use our certified interpreters as well as Language Line Services in emergency situations to ensure that LEP individuals continue to have access to necessary information and services.

Finally, BXDA will evaluate its Language Access Plan every three years to ensure compliance with federal, state, and local law. In addition, our Language Access Coordinator

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will periodically evaluate and update the content of the Language Access Plan to make sure that the needs of the community are being met.

**Recommendation #5**

Your office recommended that we implement the revised Language Access Plan “with all due expediency” and post the plan to our website with the name of our Language Access Coordinator.

BXDA has designated Violeta Sambula, Director of Interpreting Services, as our Language Access Coordinator. Our public website has been updated to include the revised Language Access Plan as well as Ms. Sambula’s contact information.

We appreciate the opportunity to work with your office on this matter. Please let me know if you have any questions or concerns.

Sincerely,

*Dahianna Castillo*

Dahianna Castillo  
Chief Financial Officer

c: Claudia Ricciardi, Deputy Chief Financial Officer  
Luisa Pages, Director of Audit and Accounting  
Violeta Sambula, Director of Interpreting Services  
Marques Johnson, Director of Operations  
Beverly Ma, Deputy Chief of Staff  
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Umarah Mills, Auditor in Charge, Office of the New York City Comptroller  
Jose Batista, Jr., Management Auditor, Office of the New York City Comptroller





NEW YORK CITY COMPTROLLER  
**BRAD LANDER**

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