



NEW YORK CITY COMPTROLLER
BRAD LANDER

Maura Hayes-Chaffe
Deputy Comptroller for Audit

Audit Report on the Richmond County District Attorney's Office's Provision of Language Access Services

SZ23-090A | July 12, 2023







THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
BRAD LANDER

July 12, 2023

To the Residents of the City of New York,

My office has conducted an audit of the Richmond County District Attorney's Office's (RCDA'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 RCDA. 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 RCDA 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, RCDA was not fully compliant with certain aspects of Local Law 30 related to Language Access Plans (LAP) and Language Access Coordinators (LAC).

The audit makes six recommendations, including, RCDA ensure that all documents commonly distributed to the public are translated into the top 10 NYC NELP languages; update its signs informing the public of the availability of interpretation services to specify that the interpretation services are free; ensure all frontline staff receive training regarding language access services ; amend the LAP to include select policies required by Local Law 30 that are missing; and implement the revised LAP with all due expediency and post it to its website.

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

The results of this audit have been discussed with RCDA officials and their comments have been considered in preparing this report. RCDA'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.

Sincerely,

Brad Lander
New York City Comptroller

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Audit Impact

Summary of Findings

The audit found that the Richmond County District Attorney's Office (RCDA) 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, RCDA was not fully compliant with certain aspects of Local Law 30 of 2017 (LL30), which relates to Language Access Plans (LAP) and Language Access Coordinators (LAC). LL30 appears in Title 23, Chapter 11 Language Access § 23-1101 of the NYC Administrative Code.

Intended Benefits

The audit assessed RCDA'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 RCDA. The audit identified areas regarding the translation of its most commonly distributed documents and LAP where RCDA 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.¹

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):** LL30 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).² ³ 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 events), and craft widely distributed

¹ 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.

² City agencies that receive Federal funding, including RCDA, 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.

³ 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.

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):** 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.

RCDA investigates and prosecutes criminal conduct on Staten Island. RCDA works in partnership with law enforcement and the people of Staten Island 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. RCDA has various units and bureaus that interact directly with the public, including the Victim Services Unit, which is comprised of victim advocates whose mission is to provide support services to individuals who have witnessed or been victimized by crime on Staten Island. Victim Advocates accompany victims to court appearances, discuss safety issues, provide referrals for counseling and other services, and connect victims with resources and benefits they are entitled to as victims of crime. In 2016, RCDA created a separate Domestic Violence Bureau that works solely on handling the borough's domestic violence cases. The Domestic Violence Bureau allows RCDA to provide additional legal support to victims of domestic violence.

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) RCDA 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 RCDA

The matters covered in this report were discussed with RCDA officials during and at the conclusion of this audit. An Exit Conference Summary was sent to RCDA on May 11, 2023, and discussed with RCDA officials at an exit conference held on May 22, 2023. On May 26, 2023, we submitted a Draft Report to RCDA with a request for written comments. We received a written response from RCDA on June 12, 2023. In its response, RCDA agreed with the report's findings and recommendations, stating: "Throughout the assigned compliance-monitoring period: January 2023 to June 2023 – we have updated the Compt[r]oller's automated compliance-monitoring system as we completed outstanding areas of non-compliance."

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

Detailed Findings

The audit found that RCDA 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, RCDA was not fully complaint with certain aspects of LL 30. Specifically, RCDA did not ensure translation of its most commonly distributed documents in the top 10 NELP languages and did not create certain required policies. These are discussed below.

RCDA Generally Provides Language Access Services to NELP Clients as Required

The auditors found that RCDA:

Provides language access services to NELP clients. RCDA contracts with several language access vendors for language access services, including Language Line, for telephonic interpretation and written translation, and Geneva Worldwide, Inc. for transcription. Both vendors can interpret and translate in the top 10 New York City NELP languages as designated by the Mayor's Office of Immigrant Affairs (MOIA).⁴ RCDA also contracts with independent interpreters and made use of both multilingual staff and court-provided interpreters to assist the NELP population receive access to RCDA provided services. RCDA also provided on-site and video sign language interpretation using SignTalk, a national sign language interpretation service vendor.

- **Notifies the public of the right to free interpretation services.** RCDA 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 sign notifies the public of the availability of interpretation services in English and the top 10 NELP languages.

However, while the website mentions that interpretation services are free, the signage in the office does not. Not knowing that the services are free could dissuade people from asking for them. RCDA should update its signage to reflect this important detail.

- **Provides access to pertinent information on its website in over 100 languages.** When functioning correctly, the translation feature provided by RCDA can translate

⁴ The top 10 NYC NELP languages are Spanish, Chinese (simplified, traditional), Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, and Polish.)

website text into 104 languages, including English and the top 10 NYC NELP languages. However, when auditors viewed RCDA's website in December 2022 and January 2023, the translation feature was not functioning as intended. Auditors informed RCDA that the translation feature was not functioning properly at the entrance conference held on January 23, 2023. The auditors found that RCDA corrected the malfunction, and the translation feature was operational by January 26, 2023.

- **Trains its staff in the availability of language access services.** RCDA provided auditors with documentation showing 30 employees recently hired between June 2021 to January 2023 had attended a training session for which auditors received a copy of the training presentation.⁵ Topics discussed included the use of Language Line and interpreter/translation services. RCDA also submitted a set of instructions for contacting Language Line for telephonic interpretation, as well as a database used to log instances where RCDA staff used either an interpreter or translation to provide services, indicating the training was given and translation services were used when requested.

RCDA Was Not in Compliance with Several Key Aspects of LL 30

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

Local Law 30 requires agencies to identify and translate documents that are most commonly distributed to the public. RCDA submitted digital copies of two pamphlets it identified as being its most commonly distributed documents: one that contains information on the services provided by the RCDA Immigrant Affairs Unit; one that informs the public about NYC human rights laws that protect against discrimination based on sexual orientation. The auditors found that the pamphlet informing the NELP population about the RCDA Immigrant Affairs Unit was not translated into 3 of the top 10 NELP languages (Bengali, French, and Haitian Creole). The NYC Human Rights Law pamphlet was not translated into 1 of the top 10 languages (Polish).⁶

⁵ RCDA was unable to provide auditors with documentation that employees hired prior to June 2021 attended the training.

⁶ RCDA's Immigrant Affairs Unit pamphlet was translated into 7 of the top 10 NYC NELP languages (Arabic, Chinese, Korean, Polish, Russian, Spanish, Urdu) as well as two other locally prominent languages (Tamil and Sinhala) to serve the Staten Island immigrant population. The NYC Human Rights Law's pamphlet was translated into 9 of the top 10 NELP languages (Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, and French).

RCDA should provide its most commonly distributed documents in all required languages, as well as any additional languages that reflect its community, and should use its contracted language service providers to translate documents as needed. RDCA stated that they will review its documents to ensure that they comply with Local Law 30.

RCDA's Language Access Plan Not Fully Compliant with LL 30

Language Access Plans used for the provision of interpretation and translation services ensure both equal access to government services for English-speaking and NELP individuals, as well as agency compliance with applicable laws and regulations. However, RCDA had not created or implemented an LAP or designated a Language Access Coordinator (LAC) prior to this audit.

Auditors requested a copy of RCDA's LAP on January 23, 2023, but did not receive one. At a meeting held on March 21, 2023, auditors informed RCDA that a LAP was necessary to comply with LL 30, and that several key aspects needed to be considered when designing it (detailed below). On April 14, 2023, RCDA delivered its LAP to auditors. As of May 8, 2023, RCDA has updated its website to include the name and title of the LAC and its LAP.

Auditors found that RCDA's LAP addresses several key aspects required by the law, including descriptions of how RCDA will provide language access services, how it considered the four factors in creating the LAP, and how the needs of the NELP population likely to be served were incorporated. It also 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. Finally, the LAP also notes that employees will be notified when substantial changes to the plan are made.

However, several key aspects required by Local Law 30 are not addressed in RCDA's LAP, including that RCDA 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 eight of the most commonly spoken non-English languages).
- Create policies for monitoring the effectiveness of RCDA's provision of language access services.
- 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.
- 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.

A LAP that incorporates all aspects required by LL 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 RCDA 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, RCDA provided documentation that it had updated its LAP and included the necessary language to comply with Local Law 30. In addition, the pamphlets had been translated into the top 10 NELP languages as well as the NELP languages that serve the RCDA community and RCDA updated its signage to indicate that language access services are free.

Recommendations

To address the abovementioned findings, the auditors propose that RCDA:

1. 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.

RCDA Response: The agency agreed with this recommendation.

2. Update its signs informing the public of the availability of interpretation services to specify that the interpretation services are free.

RCDA Response: The agency agreed with this recommendation.

3. Continuously monitor its website to ensure that any further malfunctions are corrected in a timely manner.

RCDA Response: The agency agreed with this recommendation.

4. Ensure all frontline staff receive training regarding language access services as required by LL30 and maintain documentation on all training attendance.

RCDA Response: The agency agreed with this recommendation.

5. Amend the LAP 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) for monitoring the effectiveness of the language access services RCDA provides; (4) providing language access in all public communications and emergency preparedness responses; and (5) for updating the LAP at least every three years in accordance with Local Law 30.

RCDA Response: The agency agreed with this recommendation.

6. Implement the revised LAP with all due expediency and post it to its website.

RCDA Response: The agency agreed with this recommendation.

Recommendations 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 of this audit was January 1, 2018, through April 17, 2023.

To achieve the audit objectives, auditors performed the following:

- Reviewed relevant criteria including:
 - LL73;
 - EO120, LL30, LL 25, EO13166;
 - Administrative Rules of the Unified Court System & Uniform Rules of the Trial Courts;
 - 67 FR 41455;
 - American Bar Association Standards for Language Access in Courts; and
 - Section § 202-a.
- Created compliance checklists to assess RCDA's compliance with LL 30.
- Conducted interviews and walkthroughs with key RCDA personnel involved with the provision of language access service.
- Requested RCDA's Language Access Plan (LAP) for the period 2018 through 2023.
- Reviewed and assessed whether RCDA's LAP as of April 17, 2023, was developed in accordance with Local Law 30, using the required four-factor analysis.
- Tested whether RCDA provided direct public services in at least the top 10 NELP languages spoken by the New York City population by (1) reviewing RCDA's LAP; (2) conducting visits at RCDA's locations; and (3) conducting interviews with pertinent personnel regarding the provision of language access services.
- Obtained and reviewed documentation and assessed whether RCDA identified and translated the agency's most commonly distributed public documents provided to or completed by the public.
- Conducted site visits to RCDA's locations on Staten Island to observe RCDA's translation services and ensure equity and inclusion for RCDA'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.

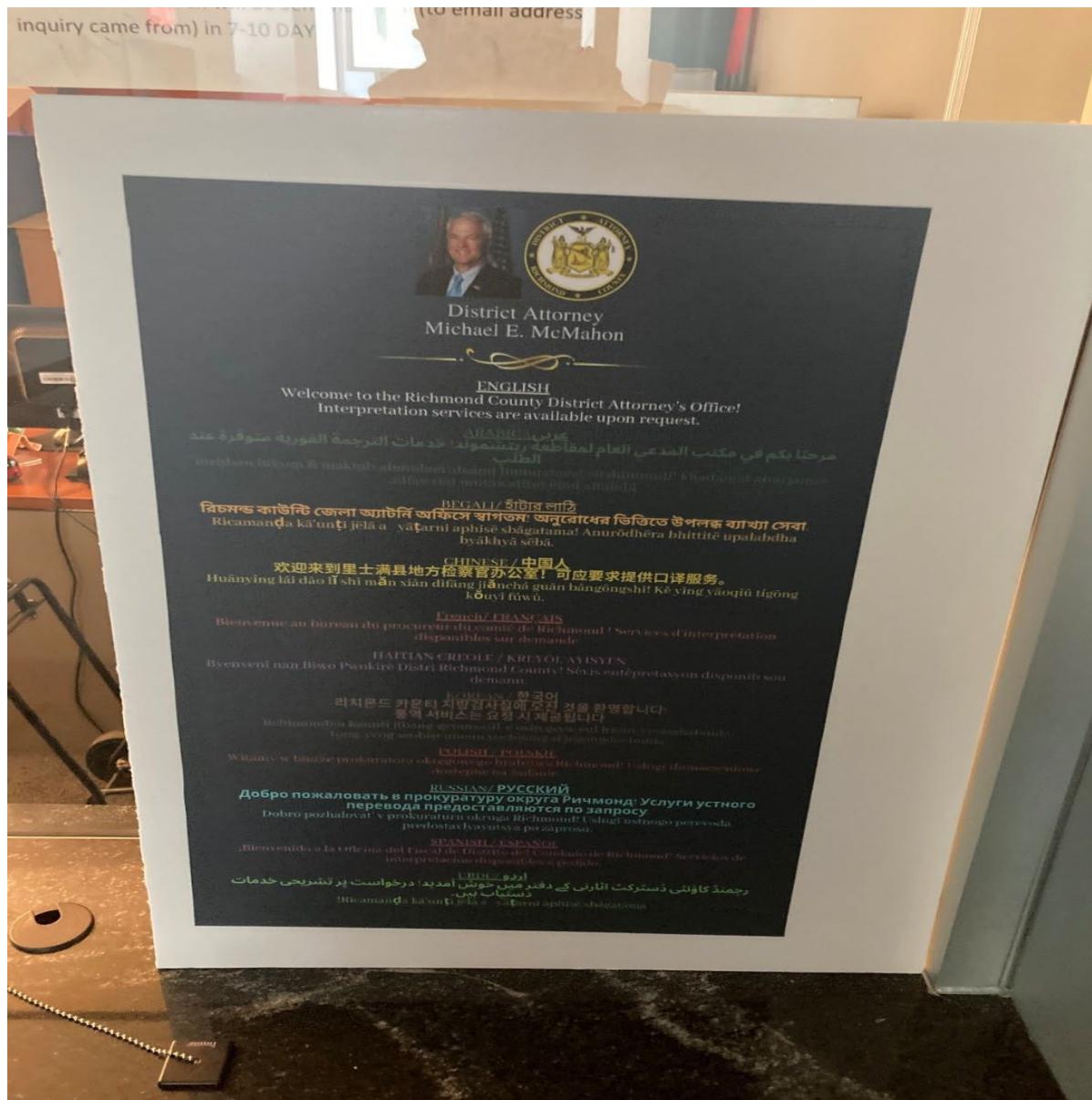
- Reviewed RCDA signage kits to determine whether they contained multilingual posters.
- Reviewed and assessed whether RCDA established an appropriate monitoring and measurement system regarding the provision of agency language services.
- Reviewed and assessed whether RCDA created appropriate public awareness strategies for the agency's serviced NELP population by visiting RCDA's locations to determine whether the required notification of the right of free interpretation services is posted in conspicuous locations. Auditors observed various RCDA documents notifying the public of the right to interpretation such as the posters on the wall.
- Reviewed whether RCDA's LAP and name and title of the designated Language Access Coordinator were posted to its website as of April 17, 2023.
- Accessed RCDA's website and translated the information into the top 10 languages spoken in New York City as of April 17, 2023.

Determined whether it was appropriate to conduct a Client Survey to ascertain whether RCDA NELP clients were able to receive services in their preferred NELP language. Auditors discussed the potential for a survey with RCDA at the Entrance Conference and a Walkthrough site observation meeting. Auditors informed RCDA that the survey would not include identifying questions or any details about the reasons survey participants had sought services from RCDA. RCDA 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. RCDA 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 RCDA's language access audit.

Appendix I

RCDA LANGUAGE ACCESS COMPLIANCE OBSERVATIONS

#1: RCDA SIGNAGE



RCDA signage is conspicuously placed and notifies the public of the availability of interpretation services in RCDA locations. However, the signage does not notify clients that the services are free.

#2: RCDA DOCUMENTS AVAILABLE IN MULTIPLE LANGUAGES

SPANISH

¿Qué es una Visa U?

Una Visa U se emite a víctimas de ciertos crímenes que han sufrido abuso mental o físico y que son titulares para la aplicación de la ley en la investigación o el enjuiciamiento de la actividad delictiva.

La Unidad de Asuntos Migratorios es una agencia que certifica el estatus de no-inmigrante I-918, Suplemento U, conocido como la Visa U. Nuestra personal certifica y habilita para la certificación de solicitudes de Visa U. Para calificarse para esa certificación, la víctima debe cooperar plenamente en el procesamiento de un caso manejado por la Oficina del Fiscal de Distrito del Condado de Richmond.

Para obtener más información sobre las Visas U, contacte a la Unidad de Asuntos Migratorios: (718) 697-8326.

Si ha sido víctima de un crimen o le gustaría denunciar información sobre un crimen, no tenga miedo de hacerlo.

Es nuestro trabajo ayudarlo,

**SIN IMPORTAR SU
ESTATUS MIGRATORIO,**

Contáctenos:
Condado de Richmond
Fiscal de Distrito
Unidad de Asuntos Migratorios

Llámenos al:
 (718) 697-8326

Haga una cita y visítenos en:
 130 Stuyvesant Place-8th Floor
 Staten Island, NY 10301

En línea en:
StatenIslandDA.org

Correo electrónico:
ImmigrantAffairs@nyc.gov

Redes sociales:
@StatenIslandDA

**Oficina del
Fiscal de Distrito
del Condado de
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**Unidad de Asuntos
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Aquí para servir y
proteger a todos los
habitantes de Staten
Island



Michael E. McMahon
Fiscal de Distrito

Addendum



OFFICE OF THE DISTRICT ATTORNEY RICHMOND COUNTY

MICHAEL E. McMAHON
DISTRICT ATTORNEY

June 12, 2023

Maura Hayes-Chaffe
Deputy Comptroller for Audit
New York City Comptroller
One Centre Street
New York, NY 10007

Re: RCDA Language Access Draft Report

Dear Deputy Comptroller Maura:

We have reviewed the Comptroller's audit for the RCDA language access report. Please find our written response on actions that have been taken or will be taken to the report's remaining recommendations.

Throughout the assigned compliance-monitoring period: January 2023 to June 2023 - we have updated the Comptroller's automated compliance-monitoring system as we completed outstanding areas of non-compliance.

Should you have any questions regarding our comments or need any further information, please do not hesitate to reach out to my Chief of Administration, Monique Jones Hardwick at (718) 556-7170; monique.jones@rcda.nyc.gov. Thank you.

Sincerely,

Michael E. McMahon
District Attorney

**Response of the Richmond County District Attorney's Office
to the Comptroller's Office's Provision of Language Access Services Audit Report
Determination: Final**

Below please find a response to the final determination of the audit report and each of the individual action taken or plan for the outstanding recommendations:

Monitoring Required During Assigned Period: January 2023 to June 2023

Recommendation #1: 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.

RCDA Response to Recommendation #1:

In RCDA's response to the Comptroller's recommendation, we submitted proof of our most commonly distributed documents in the top NYC NELP languages, as well as the top languages that are likely to serve the local NELP community on May 23, 2023.

Recommendation #2: Update its signs informing the public of the availability of interpretation services to specify that the interpretation services are free.

RCDA Response to Recommendation #2:

RCDA has replaced all the signage in areas where we serve the public to specify that all of our language access services are free. The updated language included on all signage was submitted to the comptroller's office on May 23, 2023.

Recommendation #3: Continuously monitor the website to ensure that any further malfunctions are corrected in a timely manner.

RCDA Response to Recommendation #3:

RCDA has included monitoring the websites to make sure language access policies are updated and language access links are properly functioning, to the Language Access Coordinator's duties.

Recommendation #4: Ensure all frontline staff receive training regarding language access services as required by Local Law 20 and maintain documentation on all training attendance.

RCDA response to Recommendation #4:

RCDA has included the documentation and storing of data for frontline staff's language access training to the Language Access Coordinator's duties.

Recommendation #5: Amend the LAP to include policies (1) to state that the vital documents should be translated into the top 10 NYC NELP languages; (2) for timely response to complaints; (3) for monitoring the effectiveness of the language access services RCDA provides; (4) providing language access in all public communications and emergency preparedness responses; (5) for updating the LAP at least every three years in accordance with Local Law 30.

RCDA Response to Recommendation #5:

During the Comptroller's exit conference meeting, RCDA illustrated all the suggested changes that were included in the revised plan. The final LAP was submitted on May 23, 2023.

Recommendation #6: Implement the revised LAP with all due expediency and post it to its website.

RCDA Response to Corrective Action #6:

An email was sent to the Comptroller's office on May 23, 2023, confirming the final LAP plan, which included all of the Comptroller's suggestions, was posted on our website.





**NEW YORK CITY COMPTROLLER
BRAD LANDER**

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